

# THE **NATURE** OF BUSINESS:

CORPORATE INFLUENCE OVER THE CONVENTION ON BIOLOGICAL DIVERSITY AND THE GLOBAL BIODIVERSITY FRAMEWORK

DECEMBER | 2022



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**FRIENDS OF THE EARTH INTERNATIONAL** IS THE WORLD'S LARGEST GRASSROOTS ENVIRONMENTAL FEDERATION WITH 73 NATIONAL MEMBER GROUPS AND MILLIONS OF MEMBERS AND SUPPORTERS AROUND THE WORLD. OUR VISION IS OF A PEACEFUL AND SUSTAINABLE WORLD BASED ON SOCIETIES LIVING IN HARMONY WITH NATURE. WE ENVISION A SOCIETY OF INTERDEPENDENT PEOPLE LIVING IN DIGNITY, WHOLENESS AND FULFILMENT IN WHICH EQUITY AND HUMAN AND PEOPLES' RIGHTS ARE REALISED. THIS WILL BE A SOCIETY BUILT UPON PEOPLES' SOVEREIGNTY AND PARTICIPATION. IT WILL BE FOUNDED ON SOCIAL, ECONOMIC, GENDER AND ENVIRONMENTAL JUSTICE AND BE FREE FROM ALL FORMS OF DOMINATION AND EXPLOITATION, SUCH AS NEOLIBERALISM, CORPORATE GLOBALISATION, NEO-COLONIALISM AND MILITARISM. WE BELIEVE THAT OUR CHILDREN'S FUTURE WILL BE BETTER BECAUSE OF WHAT WE DO.

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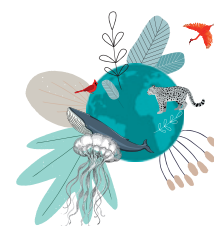
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## INTRODUCTION



## 1.1 ABOUT THIS REPORT

This report explores how business interests have tried to shape the recent course of the work of the Convention on Biological Diversity (CBD) and, in many cases, have succeeded in doing so. It focuses specifically on the development of the Post-2020 Global Biodiversity Framework (GBF). However, the context is the broader and longer span of business influence over the CBD, especially since the Rio Earth Summit in 1992 where the CBD was open for signature.

It is rarely possible to show a direct cause-and-effect relationship between a particular piece of corporate lobbying or activity and a specific outcome, such as a change in policy or wording in a draft agreement such as the Post-2020 GBF. All such texts are subject to multiple interests, influences and pressures. Nevertheless, there are indications of how specific interests following the GBF have been *pushing* text, and the methods by which this is being done are also fairly visible.

This report has primarily been undertaken through desk research, but numerous inside sources have been interviewed or have provided written information. These include civil society observers as well as representatives from groups representing business interests. A short questionnaire was also sent to both NGOs and corporate groups. Some of these individuals have been involved in the CBD<sup>i</sup> for decades. A special word of thanks is offered to all those who have taken the time to contribute information and views.

This report does *not* cover the way in which the private sector uses its various associations with the CBD to present an image of itself as progressive or environmentally concerned (i.e., to greenwash itself). The distinction between such greenwashing and the pursuit of actual influence over the CBD and the outcomes of the GBF formulation process can be quite blurred. For example, several key business groups have constantly stated that they call for an “ambitious” GBF.<sup>1</sup> This plays very well as a public message. However, the reality is that the specific measures being promoted do not add up to what is needed to protect biodiversity and properly implement the Biodiversity Convention.

Similarly blurred is the distinction between business interests and the interests of some of the larger international conservation organisations. A handful of the latter are members of the key corporate lobby groups that have been most active and visible around the CBD. They behave in many respects like any other large corporations and have the global financial turnover to match. There is a constant interplay between the staff and boards of large businesses and large conservation NGOs. Groups such as WWF, TNC, and Conservation International have multiple ‘partnerships’ with corporations, meaning that they receive a constant flow of private funding from them.<sup>ii</sup> For example, WWF-UK partners with Anheuser-Busch InBev, HSBC, Reckitt Benckiser and Tesco;<sup>2</sup> TNC’s corporate donors include Alcoa, Amazon, BHP, Bunge, Coca-Cola, Dow, Shell and Syngenta;<sup>3</sup> whilst Conservation International has partnerships with Apple, Kering, McDonald’s, Microsoft, Mitsubishi, Mondelez, Northrop Grumman and United Airlines, amongst others.<sup>4</sup> It is not always clear whether the agendas of the corporate lobby groups are being led or influenced by the conservation groups or vice versa. At any rate, the presence of these conservationists in the corporate groups undoubtedly lends credibility to business lobbying.

It should also be noted that corporate influence over processes such as the Global Biodiversity Framework is often exercised at the national level, in meetings and other lobbying activities directed at key Parties’ decision makers or officials. This modus operandi is much more opaque than active business engagement in the formal CBD processes.

## 1.2 THE BIODIVERSITY CRISIS AND THE IMPORTANCE OF THE CBD

Biodiversity is in crisis, as shown by the *IPBES global assessment report*,<sup>5</sup> which states that a million species are in danger of extinction, and by the Nine Planetary Boundaries report,<sup>6</sup> which rates the biodiversity crisis as posing the highest level of danger for the planetary system.

The delegates to the 1992 Rio Earth Summit had already understood that biodiversity was a key environmental issue, and they defined a convention with a triple aim: to establish global strategies for the conservation of biodiversity, for its sustainable use, and for the fair and equitable sharing of its benefits. The CBD is a legally binding agreement. Yet, in its 30 years of existence, its decisions have not changed the course of the ongoing destruction of the environment. On the contrary, the situation has become worse. The most recent strategic plan (2010-2020), with its Aichi Targets, was never implemented and only 1 of the 20 targets was fulfilled.

Yet the preparations for the new strategic plan for the period 2020-2030 have lacked a thorough analysis of the factors that went wrong. In fact, such an evaluation has been actively avoided. Implementation measures have been weak, and repercussions for non-compliance with CBD decisions have been non-existent.

Knowing that CBD decisions are generally linked to environment ministries, which tend to have little power in their respective governments, the CBD has started a process to “mainstream biodiversity into all sectors”. Decisions on the mainstreaming of agriculture, forestry and tourism were taken in 2016; on energy, manufacturing and mining in 2018; and there is a plan to set up a Long-Term Approach for Mainstreaming to be approved at COP15 in December 2022. However, instead of defining policy lines that would prevent business from harming biodiversity, the CBD has instead invited business to the table and asked them what voluntary measures they would be willing to take. Needless to say, this is not only hugely insufficient but also severely undermines the power of the CBD to actually regulate business.

<sup>i</sup> Note that for the sake of brevity, we refer to ‘the CBD’ where we mean the processes of the CBD and/or the actors involved.

<sup>ii</sup> For WWF International, it is not possible to know exactly how much corporate funding is received as the organisation does not publish accounts on this.

### 1.3 THE GROWING INTEREST OF BUSINESS IN BIODIVERSITY

Biodiversity protection is a relatively new focus and area of policy ‘engagement’ for global business. In the initial stage, the main interest came from sectors such as forestry. The pharmaceutical and biotechnology sectors turned up later, and have been seeking to shape and maintain policies that will ensure unfettered access to genetic resources and the right to bring genetically modified products to the market.<sup>7</sup> But the involvement of finance, resource companies and industry, along with global business fora and coalitions such as the World Economic Forum (WEF) and the World Business Council for Sustainable Development (WBCSD), has snowballed in recent years. This has been catalysed by, and is focused on, developing the new CBD ten-year action plan, the Post-2020 Global Biodiversity Framework. Possible reasons behind this heightened corporate interest are:

- There is increasing scientific and societal understanding that biodiversity is collapsing, and the pressure on policymakers and businesses to address the causes is growing. However, addressing the real drivers would affect the economic interests of most businesses. Therefore, they make sure they are present to demonstrate their goodwill to cooperate – but on their own terms. In this way, they avoid the imposition of measures that are inconvenient or that would affect their economic interests. Offsetting, self-certification, self-regulation and Nature-Based Solutions are all examples of ‘alternative’ measures that give an impression of action while assuring corporates that they don’t have to shrink their businesses or profits.
- There is an increasing global pro-business discourse, and many actors involved in the CBD process have actively sought business participation. The argument has been that “*without business, we can’t tackle environmental problems*”. However, an analysis of the negative consequences of business engagement is lacking.
- There is an increasing belief that state finance is insufficient for addressing biodiversity needs. Most financial pledges in the CBD presume the use of private finance. This is another reason why state actors are interested in attracting the private sector to the CBD.
- Discussions on the economic valuation of biodiversity (which have received high-profile interest through studies such as the 2021 Dasgupta Review on ‘natural capital’), have inevitably morphed into the consideration of ‘nature’ as a commodity and a potential new asset class, possibly worth hundreds of trillions of dollars<sup>8</sup> with its unparalleled opportunities for trade and profit.
- The Covid-19 pandemic shocked businesses and governments into a realisation of the potential hard financial consequences of humanity’s disrespect for wildlife and ecosystems. This belief was opportunistically encouraged by sectoral interests, but, for the first time ever, the economic and business costs were real and countable. Therefore, companies and entire sectors were also able to understand the danger of the recurrence of similar future abuses of ‘nature’.
- The Covid-19 pandemic also demanded an unusual response from business and government. Calls to ‘Build Back Better’ and for the creation of a ‘Green New Deal for Nature’ abounded. The potential for mass injections of capital into ‘nature’, with the accompanying job creation and profits, was not lost on the WEF and WBCSD.
- The increasing pressure on corporations to account for climate emissions, and even regulatory obligations for disclosure, mitigation and costs, has led to the understanding that similar obligations might emerge in other areas. Business has placed biodiversity loss on a comparable level of concern as climate change, and the possibility of biodiversity-related costs has sparked the attention of some corporate leaders.
- Relations between big business and conservation groups have widened and deepened. On the one hand, some would argue, this has had the beneficial impact of bringing concerns about biodiversity into more board rooms and corporate policies. On the other hand, it has also deepened corporate appreciation of the astonishing power of ‘nature’ – associated with a desirable and idyllic lifestyle – as a marketing tool. ‘Nature’ makes money.

As a result of all of these factors, corporate interest in biodiversity and related policies has proliferated in recent years.

## 1.4 THE CONTEXT FOR THE GLOBAL BIODIVERSITY FRAMEWORK: ACTION PLAN DEVELOPMENT THROWN OFF COURSE BY 'NATURE'

The Global Biodiversity Framework will be a strategic plan under the Convention on Biodiversity that sets specific goals and targets towards a global mission for biodiversity for 2030. It will replace the Aichi Targets, agreed by the CBD in 2010, which set five strategic goals and 20 associated targets to be achieved by 2020. These targets were however never sufficiently implemented.

Before the pandemic struck, 2020 was billed by some international conservation organisations and agencies as a “*super year for the environment*”.<sup>9</sup> They foresaw multiple global initiatives aligning in a propitious constellation for ‘nature’; the IUCN Marseilles World Conservation Congress planned for June; the Climate COP26 scheduled for November, which included ideas closely related to ‘Nature-Based Solutions’ on the global climate change policy agenda; and the CBD COP15, originally planned for December 2020. It was thought that all of these summits would provide important stepping stones towards an agreement at the CBD COP. Furthermore, the UN Food Systems Summit in New York in September 2021 was projected to bring about engagement with the agricultural sector, the biggest destroyer of ‘nature’. All of these events were slated to unite elements of both biodiversity and climate policy, and would in particular advance the so-called ‘Nature-Based Solutions’ built around the collaboration between conservationists and corporations.



# HOW CORPORATE INFLUENCE AND CAPTURE OF THE CBD (AND OTHER UN AGENCIES) WORKS

# 02



## 2.1 THE BROADER CONTEXT OF CORPORATE CAPTURE OF THE UN: EXAMPLES OF CAPTURE OF OTHER AGENCIES AND AGREEMENTS

Corporate capture of UN processes and institutions is not new. As long as the UN has existed, the private sector has interacted with it and sought to exert influence upon it. As with lobbying and influence over national and sub-national authorities, the purpose at the international level is to promote business interests and profits, expand markets, ensure that regulatory changes at most establish a ‘level playing field’ and do not increase obligations and costs, and ideally increase the flow of incentives and the delegation of government responsibilities to businesses.<sup>10</sup>

The 1992 Rio Earth Summit was a key moment for environmental policy. While the establishment of the Rio Conventions (including the CBD) was an important milestone, the conference was also marked by unprecedented levels of corporate lobbying. The seeds for the

corporate takeover of the UN’s environmental system were planted in Rio. A draft Code of Conduct on Transnational Corporations was abandoned after heavy pressure from industry.<sup>11</sup> The Business Council for Sustainable Development, bringing together 40 top global companies, was formed under the leadership of Swiss businessman Stephan Schmidheiny.<sup>12</sup> This would later become the World Business Council for Sustainable Development (WBCSD), which has led corporate lobbying across multiple areas of UN policy ever since, including in the CBD.

The ‘sustainable development’ narrative was also born in Rio and enshrined in Agenda 21. Governments ‘encouraged’ corporations to play a key role in the implementation of this non-binding action plan.<sup>13</sup> In addition, the creation of the UN Framework Convention on Climate Change was heavily influenced and weakened by the Global Climate Coalition, an industry lobby that was active throughout the two-year negotiating process.



Business engagement in the UN took a further step forward after 1999, with the formation under Secretary-General Kofi Annan of the Global Compact. Though originally intended to address “widespread concerns about the negative impact of corporate business practices on human rights, workers’ rights, and the environment”,<sup>14</sup> the Compact became a key channel for corporate influence across the entire UN system. It is currently almost entirely funded by business contributions and donations. The Global Compact stresses its role in promoting ‘partnerships’ between UN agencies and business,<sup>15</sup> and claims to work “throughout the UN to build capacity to work better with the private sector”.<sup>16</sup>

The next major advance towards full capture by corporate interests came in June 2019 with the signing of a Strategic Partnership Framework between the UN and the WEF. According to the WEF, the aim of the partnership was to “accelerate the implementation of the 2030 Agenda for Sustainable Development”. Nearly 300 NGOs worldwide wrote to UN Secretary-General António Guterres, calling on him to terminate the agreement.<sup>17</sup>

Given this long, deep, and systematic corporate penetration of the UN system, it is not surprising that other UN fora and processes have also become captured or heavily influenced by the private sector. Perhaps the most pernicious example of the capture of UN negotiating space has been in relation to the UN Framework Convention on Climate Change (UNFCCC). As the NGO Corporate Accountability noted in 2015:

*“From the earliest [UNFCCC] COP meetings to today, transnational corporations and their associated business lobbies have positioned themselves to undermine or influence any potential climate treaty. They have done so directly through official business sponsorships and the classification of corporate interest groups as “civil society” members at U.N. events; and indirectly through parallel conferences, media campaigns, and lobbying pressure. The result has been 20 years of wilful inaction.”<sup>18</sup>*

The Paris COP21 delivered an agreement<sup>19</sup> with an internationally adopted target, but failed to even mention fossil fuels and the need to curb their exploration and exploitation. Furthermore, the agreement relied entirely on voluntary action to mitigate climate change. The corporate capture of the UNFCCC and ensuing influence over its policies; the degrading of its ambition and impact with concepts that over-simplify the complexity of the environmental crises; and the embrace of ‘solutions’ such as offsetting and ‘net’ concepts that don’t harm corporate interests – all of these trends have strong reverberations in the CBD.

## 2.2 THE STRATEGIES USED BY CORPORATE INTERESTS TO INFLUENCE OR CAPTURE UN AGENCIES AND PROCESSES

This section looks briefly at *how* corporations typically influence UN processes and institutions, i.e., the “methods applied to undermine democratic processes”.<sup>20</sup>

**National level/party lobbying:** This is probably the most widespread, effective and opaque form of capture of UN agencies and negotiations: the continuous pressing of business interests on officials and decision-makers from the UN Member States as well as specific delegations to conventions and negotiations such as the CBD. This lobbying may be conducted by specific company staff or wider business lobbying outfits. It may be facilitated through corporate ‘onboarding’ of specific decision makers in paid corporate non-executive roles, such as board members or ‘advisors’. In the GBF negotiations, for example, the Capitals Coalition (see below) has found that participating in bilateral meetings with negotiators has been one of the most effective ways for it to engage.

**Targeting individual delegates:** Corporate entities come with a number of socially well-versed delegates who have the time and money to wine and dine individual key negotiators. Such conversations allow the range of corporate arguments to be presented and the solutions based on real environmental needs to be downplayed. Support may also be offered in the form of language suggestions that can be used in the negotiation process.

**Forming purpose-built lobbying groups:** Although world business bodies such as the International Chamber of Commerce do engage directly in lobbying, they more typically create specific groupings (and umbrella groupings). These groups usually have names that create an impression of positive contributions, for example the benign-sounding Global Climate Coalition actually represents many major US oil companies as well as the American Petroleum Institute and the National Coal Association.<sup>21</sup> In the context of the CBD, the WBCSD, the long-standing corporate greenwashing outfit, has formed and runs the Business for Nature lobby group. In addition, the Finance for Biodiversity group was created by financial institutions from around the world in early 2021.

**Gaining privileged access:** Access to officials and decision makers is critical for influencing UN negotiations, and can be difficult, especially as they tend to be extremely busy and geographically remote. For corporate interests, access is ideally achieved through gaining special status such as an ‘advisory’ role or body, or at least inclusion as a ‘major group’. Having ‘Trojan horse’ units or ‘embedded’ individuals within the agencies or secretariats of negotiations and processes can also be extremely helpful, not only for inputting a continuous flow of information and views, but also for gathering intelligence for example on the negotiating positions of key parties or other actors. Privileged access can also result from long-running ‘partnerships’, which almost all UN agencies now have with the private sector, or through the financial sponsorship of specific events or negotiations.

**‘Trojan horses’:** The business world has an all-encompassing Trojan horse in the UN in the form of the Global Compact. Other units in specific agencies can perform similar roles. Sometimes these spaces were created with the simple intention of outreach to corporations, but there is inevitably a reverse flow of information and views back into the agency. UNEP, for example, has the UNEP Finance Initiative, a partnership between the agency and the global financial sector “with more than 300 members – banks, insurers, and investors”.<sup>23</sup> The CBD Secretariat has a specific Business Engagement Programme and has created a Global Partnership for Business and Biodiversity.<sup>24</sup>

**‘Revolving doors’:** There is a constant exchange of staff between UN agencies and the private sector and its advocates. This helps with access to negotiations and brings business perspectives and sympathies into the UN system. In the CBD, an attempt by the World Economic Forum to recruit and ‘second’ a representative to the CBD Secretariat<sup>25</sup> was challenged by civil society and eventually dropped.<sup>26</sup> However, the CBD’s Business Engagement Programme has been run by a former representative of the Brazilian arm of the WBCSD since 2019.

**Membership in delegations:** The inclusion of business representatives in Party delegations clearly provides a privileged position. This direct access not only provides the chance to shape the views of the officials concerned and to occasionally speak directly to the negotiations, but it also involves access to ‘Party-only’ informal sessions that can be critical in shaping agreements as well as other sources of intelligence. Representatives of biotechnology and farming interest groups, among others, were on Party delegations at the CBD meetings on the GBF.<sup>27</sup>

**FIGURE 1** | PRIVILEGED ACCESS: WEF HOSTS CBD SECRETARY GENERAL ELIZABETH MREMA AT A ‘NATURE POSITIVE’ DINNER, WEF 2022, DAVOS, SWITZERLAND<sup>iii, 22</sup>



An even more troubling aspect to this type of influence is when companies cover the cost of participation of delegates from developing countries that otherwise couldn’t afford to bring a big delegation. This is reported to have been the case with several African country CBD delegations being paid by a private sector foundation with strong links to the genetic engineering industry. Such sponsorship would not appear on participant list records and is therefore a particularly opaque and insidious means of exerting influence.

**Interventions in meetings:** Like other interest groups, business groups make direct statements and formal submissions to negotiation meetings. This is the most transparent of the various lobbying activities, and in many ways the least revealing; what is said publicly might not be what is actually being lobbied for behind the scenes. Publicly available statements to the CBD meetings by business groups have typically been very general, emphasising what could be seen as ‘positive’ and ‘welcoming’, and worded to ensure ambiguity about specific intentions or demands.

<sup>iii</sup> Ms. Mrema used the opportunity to thank BfN’s Eva Zabey for making a strong call at a CBD meeting for mandatory reporting on business risks and targets on biodiversity, which would be “very helpful” for the Task Force on Nature-Related Financial Disclosure – see Section 4.3.

**Multistakeholderism:** The promotion of multistakeholderism has often been a tool for the advancement of corporate interests within the UN as well as in many other fora. It seeks to “bring together global actors that have a potential ‘stake’ in an issue in order to collaboratively sort out a solution”.<sup>28</sup> The key aspect of this approach is that it supplants “the international governance system, multilateralism, in which governments, as representative of their citizens, take the final decisions on global issues and direct international organizations to implement these decisions”<sup>29</sup> with another decision-making system that dissolves the differences between ‘interest holders’ and rightsholders. This exacerbates differences in power, knowledge, and capacity and puts business on an equal footing with, say, Indigenous Peoples. A situation can thus be created where ‘stakeholders’ have everything to win and rightsholders can only lose. As a report by Friends of the Earth International and the Transnational Institute has noted, “By design, multistakeholder participants can exert governing power but they, unlike national states, have no formal requirements for responsibility, no obligations and no liabilities.”<sup>30</sup>

Business lobby groups including the WEF have tried to push for multistakeholder approaches in the CBD.<sup>31</sup> The CBD Secretariat’s Global Partnership for Business and Biodiversity (GPBB) has also promoted its relations with business as ‘multistakeholder partnerships’.<sup>32</sup>

**Use of misleading, manipulative or intentionally confusing claims, dressed up as science:** This strategy has been widely used in other UN fora, for example in the context of tobacco or climate, with the purpose of distracting from and concealing truly independent and empirical scientific evidence. In relation to the CBD, for example, claims about the benefits of biofuels, including the ‘wonders’ of jatropha, and the denial of negative environmental and socio-economic consequences were going strong in the years 2007-2010<sup>33</sup> although they were later proven false.<sup>34</sup> Another example is the claim about the ‘naturalness’ or ‘nature mimicking’ of many genetic engineering technologies, including new genetic technologies,<sup>iv</sup> or even the claim that gene drives are a natural phenomenon and pose no new risks. The ‘science’ basis for so-called Nature-Based Solutions is another example (see Section 4.3). Nature has no scientific definition, nor is ‘natural’ a scientific concept, nor do any of these terms or concepts equate to safety. However, such claims are being used intentionally to provide a positive spin and distract from harmful effects.

**Funding of UN activities:** Funding of the activities, processes, events, research, programmes and publications of the UN agencies can be used to gain privileged access and to exercise influence. Such corporate sponsorship has been rife within the UNFCCC. Hundreds of UN publications are produced jointly with business groups each year. The UN’s dependence on corporate funding has been, at least in part, a “product of government’s failure to pay their ordinary contributions to multilateral institutions”.<sup>35</sup> Many UN agencies now have cosy ‘partnerships’ with businesses and associations involving private sector funding, with the inevitable result that UN agency budgets, status and staff levels become dependent on corporations.

**Corruption and distortion of language:** Another way of influencing decisions is to coin concepts and frame discussions in a business-friendly way. In the GBF negotiations for example, the concept of ‘Nature-Based Solutions’ has become a buzz phrase. Although this has an appealing ring to it, the concept is based on questionable claims and geared mainly to allow businesses to continue their harmful practices for the sake of profits.<sup>36</sup> Other terms that have appeared in the GBF discussions include ‘Nature Positive’, ‘No Net Loss’ and ‘Net Gain’.

**Obfuscation:** Many of the above elements are typically combined to serve a wider overall purpose: the blurring of the meanings, definitions, processes and role or status of participants in UN processes. This is a key corporate strategy. As the above suggests, there is a wide spectrum of obfuscatory actions, ranging from the corruption or distortion of specific bits of language, the use of the term ‘stakeholder’, the presentation of business interests as NGOs, and the introduction of false scientific arguments.

**‘Public-private partnerships’:** These alliances are a particular form of obfuscation used to conceal the private sector capture (often using public funding) of political space or programme implementation, which should be the domain of the state. As the name suggests, the CBD’s Global Partnership for Business and Biodiversity promotes such public-private partnerships.

iv E.g. genome editing via CRISPR/Cas, ‘cisgenesis’, etc.

# CORPORATE CAPTURE OF THE CBD

# 03

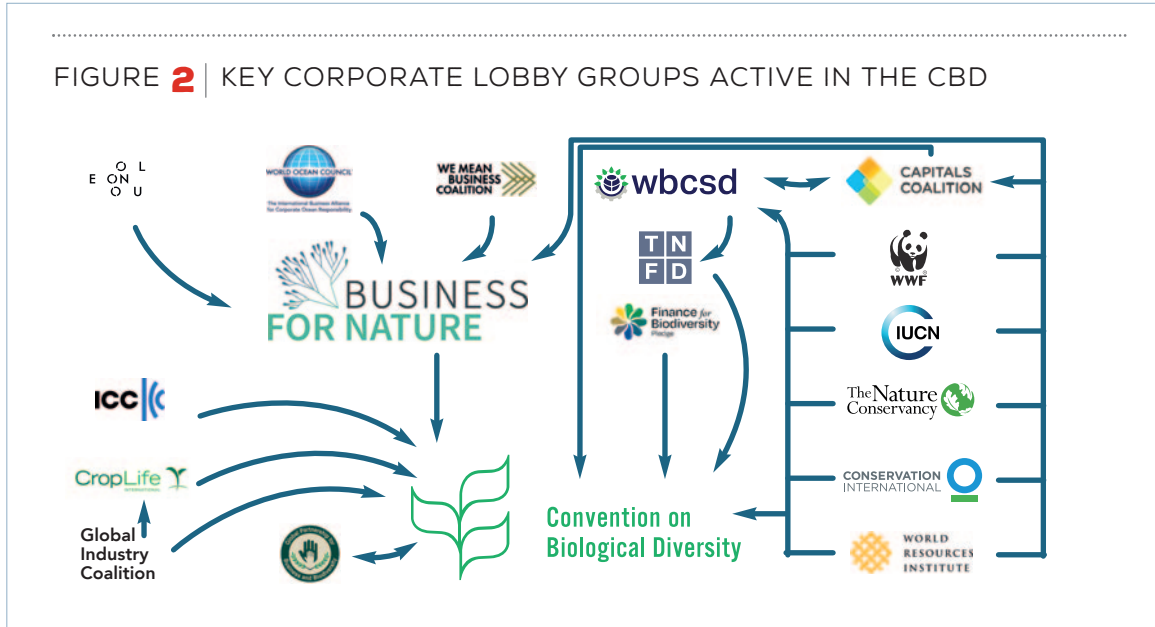


## 3.1 THE KEY BUSINESS ACTORS INVOLVED IN THE CBD

This section describes the major corporate players in the CBD to date, as well as their relationship to each other and to other actors. Figure 2 shows the links between some of these key business lobby organisations. In practice, there are very large overlaps between the memberships of some of these groups, especially between Business for Nature, WBCSD, the Capitals Coalition and the Taskforce on Nature-related Financial Disclosures. The bewildering complexity of the corporate lobbying groups serves to obscure who exactly is behind which organisation and whose interests they serve – the reality being that a relatively small group of specific actors could be involved with a number of them.

Their interests are further concealed by the participation in almost all these groups by specific international conservation organisations with strong links to corporations, and funding and governance relationships – particular Conservation International, IUCN, The Nature Conservancy, The World Resources Institute, and World Wide Fund for Nature (WWF). Each of these groups has either corporate membership, or members with corporate links, on their executive board.

FIGURE 2 | KEY CORPORATE LOBBY GROUPS ACTIVE IN THE CBD



The World Economic Forum (WEF) describes itself as “An independent international organization committed to improving the state of the world by engaging business, political, academic and other leaders of society to shape global, regional and industry agendas.”<sup>37</sup> Its partners consist of many hundreds of the world’s largest corporations from all sectors, and it also has a ‘strategic partnership’ with the Bill and Melinda Gates Foundation.<sup>38</sup> Some of the WEF’s members have been implicated in undermining global negotiations on climate change.<sup>39</sup> The WEF convenes meetings and promotes various business-supportive views in relation to the CBD, but its main participation in the GBF has been through the Business for Nature coalition. Its Action for Nature Programme also works on the sidelines of CBD-related issues. The Co-Director for ‘Nature-Based Solutions’ in the WEF is Nicole Schwab, daughter of WEF founder Klaus Schwab.<sup>40</sup>

The Bill and Melinda Gates Foundation has funded and influenced lobbyists, regulators and public narratives in order to promote synthetic biology and particularly gene drives.

During the 2018 CBD negotiations at COP14 in Sharm El-Sheikh, the influence of the Gates machinery was on clear display. Not only had the Foundation sought to influence the expert panels that inform the Convention before the actual negotiations took place, but they had also managed to ensure that political support for gene drives in Africa was established well before the official negotiations. The Foundation funded the participation of a considerable number of new African negotiators to COP14, thereby ensuring a shift in the position of the African group of delegates towards one that was in favour of gene drives.<sup>41</sup>

The foundation also funded the lobby organisation Emerging Ag, with the clear objective to influence the CBD online consultation regarding risk assessment and management for gene drives (see Section 4.6).

World Business Council for Sustainable Development (WBCSD) describes itself as “the premier global, CEO-led community of over 200 of the world’s leading sustainable businesses working collectively to accelerate the system transformations needed for a net-zero, Nature Positive, and more equitable future.”<sup>42</sup> It participates in the CBD in its own right as well as via its membership in the Business for Nature coalition.

Whilst WBCSD’s discourse is relentlessly proactive for the environment, and its public positioning on the GBF (both directly and through Business for Nature) radiates ‘ambitiousness’, its membership includes many corporations that have been accused of gross damage to biodiversity around the globe. These include Amazon, APRIL, BP, Cargill, Chevron, Bunge, Dow, Drax, DuPont, EDF, Eni, Equinor, Holcim, International Paper, McDonalds, Mondi, Nestlé, Shell, Smurfit Kappa, Sumitomo, TotalEnergies, Unilever, Walmart, Weyerhaeuser and Vale.<sup>43</sup>

For example, Vale was responsible for poisoning hundreds of kilometres of rivers with toxic mine tailings after two separate dam collapses in Brazil, in 2015 and 2019.<sup>44</sup> BP is responsible for wildlife-destroying disasters such as the Deepwater Horizon rig explosion and oil spill in 2010,<sup>45</sup> in addition to its long-term and ongoing biodiversity-threatening emissions of climate-changing gases. Smurfit Kappa is responsible for “widespread destruction of Andean and sub-Andean forests in Colombia”, replacing biodiversity there with intensive pine and eucalyptus plantations.<sup>46</sup>

Unilever has been a major user of palm oil produced by the clearing of highly diverse Indonesian rainforests to create palm plantations.<sup>47</sup> Bunge has recently been accused of biodiversity-damaging activities in both Brazil's Cerrado region and in Indonesian forests.<sup>48</sup> On top of its huge carbon emissions from fossil fuels, Equinor threatens extremely fragile marine ecosystems with its plans for Arctic oil drilling.<sup>49</sup> Shell has long been accused of 'contempt' for both the planet and people due to its oil extraction and other environmentally catastrophic activities.<sup>50</sup>

Despite all of these accumulated environmental woes, the WBCSD comes across as proactive for the planet when it speaks on behalf of its members.

**Business for Nature (BfN)**, established by WBCSD in mid-2019, describes itself as "a diverse and powerful group of more than 70 partner organizations".<sup>51</sup> Its strapline says: "We catalyse business leadership to drive policy ambition." The organisation acts as an umbrella group for various other major corporate lobby groups concerned with biodiversity, as well as their conservationist allies. In 2019, BfN claimed to "aggregate and amplify existing business commitment platforms" and stated that it planned to "influence key political decisions in 2020".<sup>52</sup> BfN's Executive Director, Eva Zabey, is a long-time WBCSD employee and was previously involved with the organisation's work on 'natural capital'.<sup>53</sup> She is also a member of the Advisory Panel of the Natural Capital Coalition.

Outside of the lobby groups involved in biotechnology, BfN has been a key channel for corporate interest over the CBD. As can be seen in Figure 2 above, its membership comprises mostly national, regional or global corporate lobby and 'sustainability' groups, including numerous WBCSD national affiliates, a few large international conservationist groups, and a variety of other general 'green business' associations, academics and think tanks. BfN's Strategic Advisory Group consists only of corporations, including Danone, GSK, Holcim, Olam International, Rabobank, Suzano, Unilever and Walmart.<sup>54</sup> A number of these companies are involved in major direct and indirect destruction of biodiversity around the world.<sup>55</sup>

BfN consulted on and developed its 'business policy asks' in relation to the CBD at the end of 2019 and the beginning of 2020. It aimed to have "(near) final high-level policy asks for WEF Davos in January to maximize influence in 2020".<sup>56</sup> According to one internal source for this study, BfN's reports and analyses have frequently been cited by various Parties, and this was especially prominent during the Open-ended Working Groups (OEWG) 3 and 4. BfN also hosted several "high level closed dialogues to discuss some of their propositions on the Post2020". One of their events at the

March 2022 OEWG meeting featured the CBD Executive Secretary Elizabeth Mrema and both Co-Chairs of the OEWG process, Basile van Havre and Francis Ogwal.<sup>57</sup>

Martin Lok, who represents both BfN and the Capitals Coalition and was a member of the Informal Advisory Group on Mainstreaming Biodiversity, stated in answer to questions for this report: "We see wording that we brought to the table through Business for Nature reflected in several parts of the draft document (including for Target 15). And we are collaborating with [the] CBD Secretariat to organize effective business and finance participation at COP15 to support the negotiations." BfN also shared that amongst its most effective ways of engaging in the CBD were "our detailed policy positions we have worked on, with input from many Coalition partners. We go into some detail on the changes we recommend and bring in expert organisations to review to ensure they are as credible as possible." He also mentioned that another important channel was "our engagement and participation at the Open-Ended Working Groups."

**International Chamber of Commerce (ICC)** describes itself as "the world business organization, enabling business to secure peace, prosperity and opportunity for all"<sup>58</sup> and claims to be the "institutional representative of more than 45 million companies in over 100 countries".<sup>59</sup> ICC has maintained a consistent involvement in the CBD over the years, although in a relatively limited way given its size and breadth of interest. However, as Figure 2 above shows, its involvement has increased significantly as the discussions on the GBF have progressed. ICC's most visible, direct inputs to the CBD have mostly been targeted at biotechnology-related issues. As a report by the German Government noted: "Some critical issues [relating to CBD] are not addressed by BfN, but remain in the hands of the International Chamber of Commerce. Among them are the access to genetic resources (...) digital sequence information or biosafety issues and liability."<sup>60</sup>

**CropLife International (CPI)** is an international industry association representing the leading global manufacturers of pesticides, seeds and biotechnology products. The members consist of the six largest agribusiness corporations, namely: BASF, Bayer Crop Science (which includes Monsanto), Corteva Agriscience, FMC Corporation, Sumitomo Chemical and Syngenta.<sup>61</sup> It also consists of 11 regional member organisations, allowing for a regional or national focus. CropLife International works for the interest of its member businesses, and its representatives are commonly present in CBD negotiations and activities at the global and regional levels. The coalition has also been participating in relevant ad hoc technical expert groups (AHTEGs).<sup>62</sup>

**The Global Industry Coalition** has been described as the “*biotech industry’s lobby platform at the UN CBD processes*”.<sup>63</sup> The coalition’s secretariat is hosted by CropLife International in Brussels. These two lobbying groups together historically constitute the largest corporate lobby group in the CBD, and represent similar interests.

**The Capitals Coalition** describes itself as a “*global collaboration redefining value to transform decision making. We unite leading initiatives and organizations under a common vision of a world that conserves and enhances all forms of capital. The Coalition is made up of over 400 organizations and engages many thousands more*.”<sup>64</sup> Most of the members are businesses – including Shell, LafargeHolcim, International Paper, Indufor, Dow and Unilever – and business associations (such as various WBCSD national affiliates). There are also some government and multilateral agencies and international conservation groups such as WWF, TNC, WRI, and IUCN. Most of the members of Business for Nature also appear to belong to the Capitals Coalition. Its national and regional hubs are led by WBCSD-affiliated groups such as CEBDS in Brazil, BCSDA in Australia, and other business lobby groups such as CECODES in Colombia and AMEBIN in Mexico.<sup>65</sup>

Martin Lok of the Capitals Coalition shared that the organisation’s most effective ways of engaging in the CBD include “contributing and co-leading on BfN policy positions” and “co-leading the advocacy towards COP15”.

**The Natural Capital Coalition (NCC)**, a sub-group of the Capitals Coalition, grew out of a former business grouping within TEEB (The Economics of Ecosystems and Biodiversity). The CBD Secretariat is a member of this coalition, and collaborated in the development of a Natural Capital Protocol,<sup>66</sup> which is a “*decision-making framework that enables organisations to identify, measure and value their direct and indirect impacts and dependencies on natural capital*”.<sup>67</sup> The Capitals Coalition and its members were also driving forces behind the establishment of the Taskforce on Nature-related Financial Disclosures.

### **Taskforce on Nature-related Financial Disclosures (TNFD):**

This grouping brings together 34 senior executives from global financial institutions, corporates and market service providers and is co-chaired by CBD Executive Secretary Elizabeth Mrema. Its mission is to “*develop and deliver a risk management and disclosure framework for organisations to report and act on evolving nature-related risks*”.<sup>68</sup> TNFD says it is “*adopting an open innovation approach that encourages market participants to support the development of the framework. (...) A market-led approach, combined with input from leading science and data bodies, means the TNFD framework is scientifically rigorous and easy to adopt for both businesses and financial institutions*.”<sup>69</sup> TNFD’s ‘Forum’ membership includes hundreds of institutions, including many finance sector corporations, but also mining and forestry companies, manufacturers and retailers, groupings such as Business for Nature and WBCSD, and the same international conservation groups including Conservation International, TNC and WWF that also collaborate with most of the other business lobby groups.<sup>70</sup>

CBD Executive Secretary Elizabeth Mrema is Co-Chair of TNFD, alongside David Craig, the former CEO and Founder of Refinitiv and Strategic Advisor to the London Stock Exchange.<sup>71</sup>

TNFD’s intended assessment and reporting framework is in the last few months of development and will potentially fulfil a specific role for corporate interests in the GBF. Indeed, the draft version of the GBF monitoring plan includes TNFD as a ‘component indicator’ for draft Targets 14 and 15.<sup>72</sup> This way, it could serve as a ‘misdirect’ – that is, a push for financial-risk reporting as the ‘answer’, eclipsing demands for a *reduction* in corporate impacts on biodiversity, and sidelining issues like business impunity for environmental and human rights harms. This proposal is being strongly challenged by environmental and social justice organisations.

### **Public Research and Regulation Initiative (PRRI)**

describes itself as “*a worldwide initiative of public sector scientists active in modern biotechnology research for the common good. The objective of PRRI is to provide a forum for public researchers to be informed about and involved in international regulations pertaining to modern biotechnology*”.<sup>73</sup> However, observers say that the PRRI network goes somewhat beyond just ‘public sector scientists’ to also include “*regulators from the Dutch, Brazilian, Honduran and Canadian delegations to the UN talks, some of whom hold prominent negotiating roles, as well as lobbyists from Bayer, Monsanto, [and] CropLife International*”.<sup>74</sup> PRRI was originally funded by Monsanto and CropLife, and later by the governments of Spain and Canada and the EU.<sup>75</sup>

**The Finance for Biodiversity Foundation (FBF)** is often referred to simply as ‘Finance for Biodiversity’. FBF grew out of the development of a ‘Pledge for Biodiversity’ by 26 mostly financial institutions, including the AXA Group (its CEO has often spoken on behalf of the FBF), Allianz, Caisse des Dépôts, and HBS Global Asset Management.<sup>76</sup> With pretty images of butterflies, coral reefs and whales, accompanied by soft tinkly music and acknowledgements of the importance of biodiversity, its launch video set out the group’s aims that, by 2024, the members would “collaborate and share knowledge, engage with companies, assess impact, set targets, and report publicly”.<sup>77</sup> However, the video failed to mention whether FBF members would endeavour to actually *reduce* their impacts.

The Pledge for Biodiversity was launched in the run-up to the September 2020 UN Summit on Biodiversity, and the Foundation was established in March 2021.<sup>78</sup> The aim of the Foundation is “to support a call to action and collaboration between financial institutions via working groups, as a connecting body for contributing signatories and partner organizations”.<sup>79</sup> It now claims to have 103 signatories to the Pledge and 51 financial institution members, most of them in Europe, with particularly strong links to the Dutch finance sector. FBF Co-Founder Anita de Horde formerly worked for the Dutch ‘corporate sustainability’ lobby group MVO as well as for various financial institutions including Triodos Bank and Aegon.<sup>80</sup>

**Nature Positive** is a coalition of international conservation organisations including WWF, TNC and the World Resources Institute, alongside Business for Nature, WBCSD and the Capitals Coalition, which has the specific aim to create a ‘Global Goal for Nature’.<sup>81</sup>

**International Petroleum Industry Environmental Conservation Association (Ipieca):** Ipieca says that it is “the global oil and gas association dedicated to advancing environmental and social performance across the energy transition. It brings together members and stakeholders to lead in integrating sustainability by advancing climate action, environmental responsibility and social performance across oil, gas and renewables activities.”<sup>82</sup> It has participated directly in most of the OEWG meetings and has been very present in the small room discussions on mainstreaming. Despite having many members with poor environmental track records, Ipieca gains access to decision making spaces through its pro-environmental discourse.

**Friends of Ocean Action (FoOA):** This group, hosted by the WEF, is “a coalition of over 70 ocean leaders who are fast-tracking solutions to the most pressing challenges facing the ocean”.<sup>83</sup> Its members include representatives of UN agencies and international conservation groups such as WWF, TNC and IUCN, but also large businesses such as Virgin, Salesforce, Coca-Cola, Yara International (which describes itself as “the world’s leading crop nutrition company”) and Jeff Bezos’s ‘Earth Fund’. The group has been active in the discussions around ‘mainstreaming’ biodiversity.

**World Biodiversity Network (WBN)** is one of the several ‘Impact Platforms’ spawned by the World Climate Foundation. The WCF says it “*facilitates large-scale collaboration between governments, businesses, financial institutions and international organisations, accelerating the transition to a green economy [...] We engage leading global stakeholders in our cross-sector networks to scale up ambition and action through implementing markets, solutions and action for a faster transition to a sustainable economy.*”<sup>84</sup> It is one of the business-oriented ‘convening’ platforms that promotes the concept of ‘Nature Positive’ and links biodiversity with climate. Although WBN has not yet been directly involved in the CBD, it will play a role in bringing corporate leaders into the process by convening a ‘World Biodiversity Summit’ in Montreal at the same time as the CBD COP in December. This ‘Summit’ has a high-profile patron in King Charles III of the UK, and the World Climate Foundation says it will be “the pioneering platform for global public-private partnerships to address the urgent need for biodiversity restoration through Nature-Based Solutions and nature-positive investments”.<sup>85</sup>

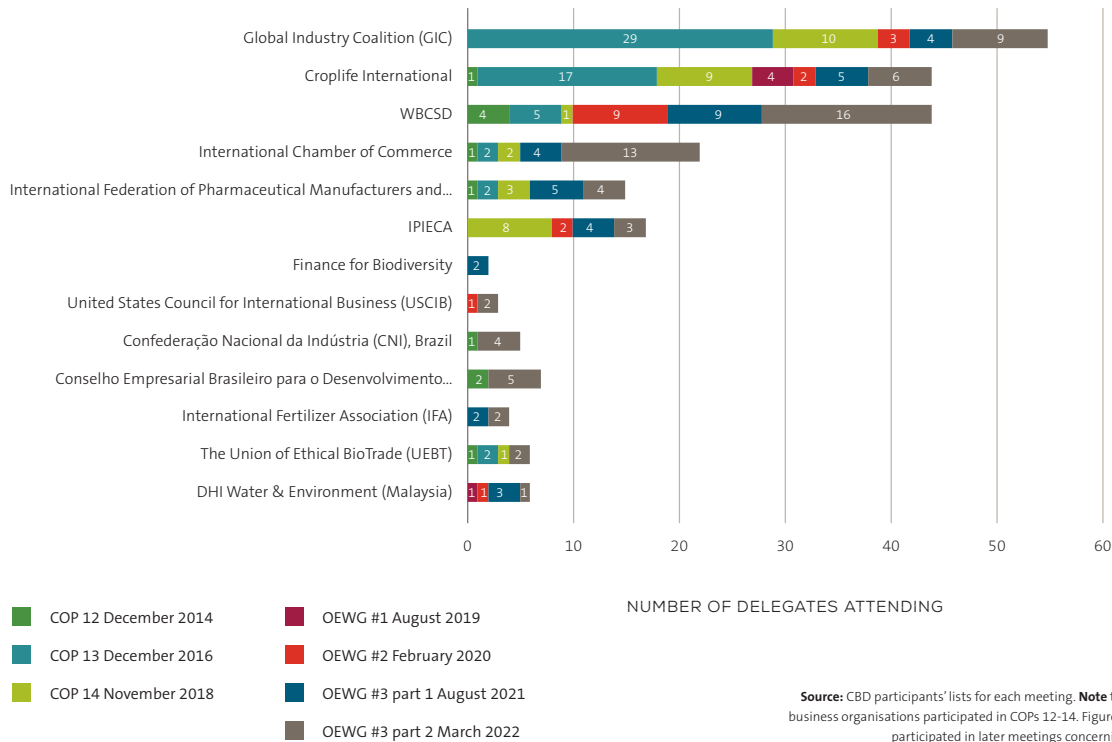
### 3.2 PARTICIPATION BY THE CORPORATE LOBBY IN CBD MEETINGS

Business representatives have been present and active in the meetings convened by the CBD since its founding 30 years ago. Their participation has increased in the GBF process. Figure 3 shows the major industry lobbying groups, the number of their delegates that attended the OEWG meetings up until March 2022, and their participation in the previous three COP meetings. The number of participants does not necessarily indicate whether they were active or whether they influenced outcomes, but it is an indicator of the extent to which corporate lobby groups consider the negotiations to be of relevance to their business interests.

It is clear that CropLife International and the Global Industry Coalition, historically the largest corporate lobby group in the CBD, have both had a very strong presence throughout the last eight years of CBD meetings.<sup>86</sup>



**FIGURE 3** | MAIN BUSINESS LOBBY GROUPS' PARTICIPATION IN KEY CBD MEETINGS, 2014-2022 (NUMBER OF DELEGATES ATTENDING)



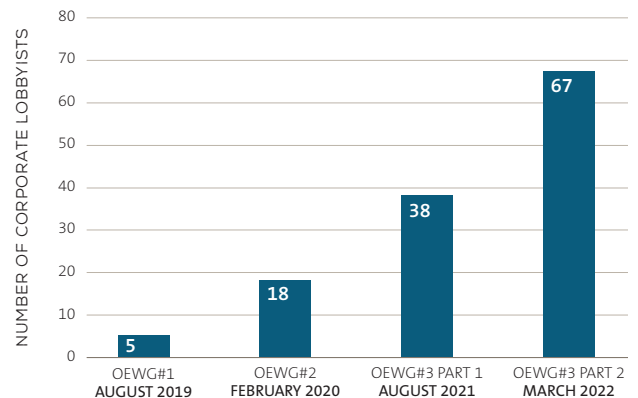
Source: CBD participants' lists for each meeting. Note that many other businesses and business organisations participated in COPs 12-14. Figure 3 only includes those that also participated in later meetings concerning the development of the GBF.

WBCSD's involvement has grown significantly since 2018, largely reflecting its subsequent formation of the Business for Nature grouping. This development has to some extent subsumed groupings such as the Japan Business Initiative for Biodiversity, which typically has had large delegations at CBD COPs.<sup>87</sup> Some of those registered as participating for WBCSD in fact represent specific industry sectors, such as the Global Cement and Concrete Association, and specific companies, including Walmart, Syngenta and JLL, which describes itself as "a world leader in real estate services".<sup>88</sup> WBCSD staff also participate in their own right.

As Figure 4 shows, the number of corporate lobbyists participating in the GBF OEWG meetings has grown from 2019 onwards.

Note that the above charts show only the lobbyists participating as observers under the name of their lobbying organisations, and *not* business representatives who form part of government delegations. Investigations for this report have discovered at least six examples of such corporate participation on national delegations. Most of these have involved representatives of biotech companies, their lobbying outfits or associated research organisations. Some examples are given below in Section 4.6.

**FIGURE 4** | NUMBER OF CORPORATE LOBBYISTS PARTICIPATING IN OEWG MEETINGS, 2019-2022



Source: CBD participants' lists for each meeting.

### 3.3 THE CBD SECRETARIAT'S OPEN DOOR FOR BUSINESS

This section considers how the Secretariat has facilitated and encouraged business engagement in the CBD. To some extent, such engagement is understandable: corporations are amongst the biggest destroyers of biodiversity, so they should be encouraged and required to change their practices. There is no shortage of support for business and its engagement in the CBD Secretariat, even at the highest levels, although this attitude does not necessarily extend to all staff members.

**Support from the Executive Secretary:** The very early stages of the discussions on the GBF happened under the auspices of Cristiana Pasça-Palmer, the then recently appointed Executive Secretary. In November 2017, she was reported to be *“keen to further strengthen business engagement”* in the CBD.<sup>89</sup> This soon materialised, as the WEF and other business organisations took part in the formative meetings on the GBF (see Section 4.1), and Pasça-Palmer proposed a *“strategic alliance with the WEF”*, including the hiring of an advisor to the Executive Secretariat directly from the WEF.<sup>90</sup> Whilst Pasça-Palmer was a controversial (and short-lived) head of CBD, her successor, Elizabeth Mrema, has proven to be no less accommodating of corporate interests.

Mrema has frequently spoken of the importance of engaging business in the CBD. She reportedly believes that the lesson to be learned from the failure to achieve the Aichi Targets is that *“governments alone cannot lead on global biodiversity loss”*. Instead, she is in favour of an *“all-of-society”* approach that includes a role for business implementation and a transfer of responsibility towards individual consumers.<sup>91</sup> Mrema has also taken the role of Co-Chair of the Taskforce on Nature-Related Financial Disclosure. This draft of this predominantly private finance sector initiative has elicited widespread concern from environmental organisations because of the seeming absence of important components such as obligations for companies to report actual impacts. Furthermore, Mrema issued statements broadly supportive of the tourist sector on each of the last two World Tourism Days, whilst these events promote an industry that has enormous direct and indirect impacts on biodiversity.<sup>92</sup>

#### The Biodiversity Economy Transformation and Innovation

**Unit:** Under Mrema, this broadly pro-business section of the CBD Secretariat has expanded.

**CBD's Business Engagement Programme (BEP):** This programme started in the first half of 2019, although the CBD's Global Partnership for Business and Biodiversity existed since long (see below). The purpose of the BEP, which is funded by the European Union,<sup>94</sup> seems explicitly to bring business interests into the GBF discussions. The BEP is also linked to the CBD Secretariat's Finance Engagement Programme, which works with *“development banks, private banks, insurance companies, associations, UNEP-FI, Task Force on Nature-related Financial Disclosures (TFND) and other players”*.

Early in the GBF process, the BEP made it clear that they saw a key role for business in its development: It's lead responsible said: *“There is an opportunity to build a united voice for business that can shape the next decade and beyond. [...] The private sector can take a leading role in the transformation needed to a sustainable future.”*<sup>99</sup> She invited both the *“business and finance sector to play a fundamental role, alongside governments and civil society, in the implementation of the post-2020 GBF.”*<sup>100</sup>

In response to questions for this report, and in reference to the CBD's Business Engagement Programme, Martin Lok of the Capitals Coalition said: *“It's key to have all stakeholders. And our role specifically is to build trust of negotiators/ government as well as of business that methodologies/ metrics are available to assess and disclose impacts and dependencies on nature. We are taking part of CBD organized webinars and other events to talk on this and CBD Secretariat is a regular speaker at our events.”* Business for Nature also responded: *“Like many other non-state actors, we work with the CBD Secretariat to ensure transparent engagement from leading companies. As a result of our relationship [...] we are involved in shaping and developing plans for the Business Hub and the Action Zone at COP15 to make sure we are bringing an ambitious, progressive and credible business voice to the table alongside other non-state actor voices.”*

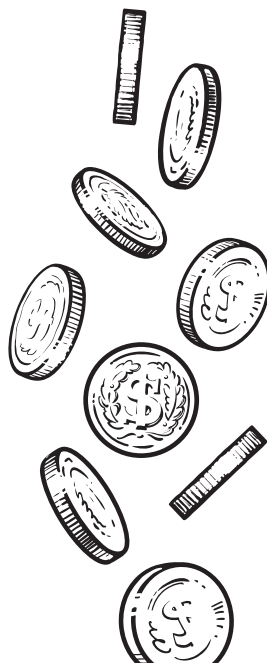
**The CBD’s Global Partnership for Business and Biodiversity (GPBB):** This grouping was formed in 2011, and was still active at least up to 2021. The formation of the GPBB was partly in response to a decision of COP8 in Curitiba, Brazil in 2006, which set out “*the need to engage businesses in achieving the objectives of the Convention*”. This decision “*foresaw the participation of businesses in various biodiversity meetings and their involvement in the development and implementation of national and international biodiversity strategies and action plans*”.<sup>101</sup> GPBB is described by the CBD as “*comprised of 21 national and regional initiatives, all working towards greater business engagement on biodiversity-related issues [...] thus a network of networks linking the various initiatives so that they can share information and good practices*”.<sup>102</sup> The grouping forms the core of participation in annual meetings of the Business and Biodiversity Forums. These seem mostly to have been a mechanism for CBD outreach to the private sector, and it is not clear whether they have played a significant role in influencing the GBF or the CBD more widely.

### 3.4 THE KEY TACTICS BEING USED IN THE CBD BY BUSINESS LOBBY GROUPS

Section 2.2 considered some of the broad strategies that corporate interests have used to capture or at least profoundly influence the course of UN discussions and negotiations, and some of the various UN bodies charged with implementing areas of its work. This section looks at general tactics that have been used in the context of the CBD, mostly by the groups listed above in Section 3.3, and specifically in relation to the formulation of the GBF.

**i. Conflating the climate and biodiversity crises:** A notable feature of corporate lobbying, especially in the earlier days of the GBF discussions, was the extent to which the ‘climate crisis’ and the ‘biodiversity crisis’ were conflated in terms such as ‘dual’ or ‘twin’ crises. The underlying metrics of the climate crisis are comparatively simple in relation to those of the biodiversity crisis, which is immensely and inherently complicated (and therefore often reliant on proxy measures, such as those widely employed in the influential WWF Living Planet Index reports<sup>103</sup>). There is little scientific agreement about whether the biodiversity crisis is most manifest at the genetic, species, population or ecosystem level. Solutions for how (and where) to tackle it are equally evasive. Whilst national efforts to tackle climate change are certainly cumulative, attempts to tackle the biodiversity crisis might well not be. Whatever metrics are used, it is clear that a relatively small number of highly biodiverse countries will carry a larger burden in protecting it.

The conflation has nevertheless been very readily taken up and repeated by governments and international agencies – no doubt reflecting the desire of underfunded and often sidelined officials working on biodiversity issues to elevate their areas of work to the status and better resourcing of climate-related work. But what may superficially appear as harmless often leads to ‘solutions’ that are based on flawed analyses and incorrect assumptions – and that serve particular corporate purposes.



Eva Zabey, the head of Business for Nature, said on the WEF website: “*Businesses are contributing to the Paris Agreement for nature. Here’s how.*”<sup>104</sup> She neglected to mention that the Paris Agreement for climate has allowed global warming to continue while its chief corporate culprits carry on with business as usual. Business for Nature has called for a “*more integrated climate-nature policy framework*”, saying “*this will [...] bring to light opportunities for overlapping solutions and provide business with certainty to scale up private-sector action*”.<sup>105</sup> Corporate lobby groups have repeated endlessly that, like the climate crisis, resolution of the biodiversity crisis needs a ‘simple’ goal and a ‘soundbite’ message that world leaders can grasp and promote (see Section 4.2). They claim that there is a common solution to both: ‘Nature-Based Solutions’ (see Section 4.3).

Just as carbon offsetting has long been portrayed as a ‘solution’ to the climate crisis, we are seeing that the above-mentioned business groups are proposing biodiversity offsetting as a ‘solution’ for the biodiversity crisis. Concepts such as ‘No Net Loss’, ‘Net Gain’ and ‘Nature Positive’ mirror climate concepts such as ‘net zero’ and ‘climate positive’. The push for reducing biodiversity into easily measurable units is equally part of this same corporate interest.

**ii. Bending the curve of the narrative towards ‘nature’:** There is agreement between some of the larger conservation groups and business interests that well-defined words such as ‘biodiversity’ should be replaced with vague terms such as ‘nature’. The proponents of this idea have argued that this would enable wider communication of the CBD’s purpose and aims;<sup>106</sup> however, it would also potentially open the door for some aspects of the Convention to become neglected or even obsolete. This approach also facilitates corporate greenwashing by potentially allowing claims to be made about compliance with or contribution to the implementation of the GBF, without any strict or definitive understanding of what this actually entails. Business lobbyists are already imploring companies to “tell their stories” about their contributions to a “Nature Positive world”. This tactic appears to have been very successful so far.

**iii. Deflecting from the need for stringent regulation and government policy-making:** A key part of this tactic has been the constant promotion of the supposed ‘good’ things companies do for ‘nature’. “*Businesses are starting to take an integrated approach*” (to tackling the biodiversity and climate crises together), proclaimed a presentation by Business for Nature and the We Mean Business Coalition. The ostensible demand was that governments need to drive business action on nature, not through regulation, but through “*collaboration between business, government, and communities*”.<sup>107</sup> Martin Lok of the Capitals Coalition noted that “*providing best practices (business case studies) to support our advocacy*” had been one of the most effective means for it to engage with the CBD, “*including through the ACT-D framework we have developed with BfN, Science-Based Targets Network, TNFD, WEF, WBCSD and WWF*”. Business for Nature has said that it is “*building a library of existing solutions to showcase how businesses are already acting*”.

In turn, private sector promises of voluntary action are already playing out at a national level. The Brazilian branch of WBCSD has inventoried “how Brazilian Companies are contributing to global biodiversity targets”.<sup>108</sup> In India, a group of businesses and stakeholder organisations, hosted by the Confederation of Indian Industry (CII), WWF India and GIZ (including its Private Business Action for Biodiversity Project), developed a joint paper regarding Indian businesses’ involvement in the CBD’s 2050 vision.<sup>109</sup>

The intended conclusion of all this showcasing of businesses’ best practices and good intentions is that proper regulation is not necessary, but can be replaced with self-regulation, self-reporting and self-certification. The current version of Target 15, which should be orientated towards corporate regulation, states that governments need merely to ensure that businesses self-regulate and self-report. This ultimately absolves governments from any obligations to regulate and control business activities.



**iv. Presenting a pretence of ‘ambition’:** The constant demands by corporate lobby groups for the conclusion of an ‘ambitious’ GBF are striking. For example, in its submission on the 2021 ‘Draft One’ of the GBF, WBCSD stressed that *“a clear and ambitious mission to halt and reverse biodiversity loss by 2030 should be an essential element of the Framework”*.<sup>110</sup> Many other business platforms have echoed the call for ‘ambition’ and ‘transformative change’ throughout the process.

The reality, however, is that the general approach, concepts and specific wording being promoted by business are far from ambitious in terms of the proper implementation of the Convention, and far from transformative in the sense of addressing most of the widely recognised underlying drivers of biodiversity loss. For example, whilst corporate groups have pushed for mandatory reporting requirements for impacts on biodiversity, their inclusion in the text has come at the price of wording that would actually require corporations to reduce their impacts.

**v. Promotion of ‘innovation’ and ‘innovative approaches’ as a solution:** WBCSD has said in a submission that *“the private sector has a critical role to play as a source of finance, as a driver of innovation and technological development, and as a key engine of economic growth and employment”*.<sup>111</sup> Business for Nature has made many of the same points. The promotion of innovation serves specific purposes: as well as positioning the private sector as a unique deliverer of ‘solutions’, especially through technology and new financial mechanisms, it also distracts from the fact many of those ‘innovations’ are actually harmful to biodiversity, and that it is the corporate sector that profits from them. Other examples of these industry-driven technologies are CRISPR and gene drive technologies.

**vii. Co-option or attempted co-option:** Co-option is present in various forms at the CBD. One internal source to this study reported that the biotech lobby brought many students and researchers to the Cancun COP16 in 2016 and attempted to penetrate the Global Youth Biodiversity Network. The same source said that IUCN and WWF are seen as a conduit through which corporate capture could operate and that both organisations have attempted to co-opt youth groups in the past. However, their overtures to date have been rebuffed. There have also reportedly been several attempts to co-opt various non-governmental groups involved in the CBD, some of which are ongoing.

Business interests are also engaged in co-option by making use of popular influencers from **civil society, academia, think tanks, and ‘celebrities’** in order to gain credibility, respectability and acceptance. Again, youth movements are a particular target for such co-option.<sup>112</sup>



# OUTCOMES OF BUSINESS ENGAGEMENT IN THE DEVELOPMENT OF THE CBD GLOBAL BIODIVERSITY FRAMEWORK

# 04



## 4.1 THE SHAPING OF AN AGREEMENT: FAILURE TO ADDRESS THE UNDERLYING DRIVERS OF BIODIVERSITY LOSS AND THE NEED FOR ‘TRANSFORMATIVE CHANGE’

In some ways, the overall ‘shape’ of the GBF – that is, the general approach it takes, the degree to which it seeks directly to implement the obligations of the biodiversity convention, the level of ‘ambition’, the extent to which it reinforces regulatory or voluntary approaches and so forth – is even more important than the precise wording of the agreement that is ultimately reached. To understand this, it is necessary to look at the early development of the discussions, and businesses’ involvement from the outset.

The context for the discussions on the GBF was formed at COP14 in Sharm El-Sheikh, Egypt in 2018. One outcome of the conference was the Sharm El-Sheikh to Beijing Action

Agenda for Nature and People.<sup>113, v</sup> This aimed to “*catalyse a groundswell of actions from all sectors and stakeholders in support of biodiversity conservation and its sustainable use*”, enabling a “*a paradigm shift in the human-nature relationship*”. It would raise awareness and “*inspire and help implement Nature-Based Solutions to meet key global challenges*”.<sup>114</sup> The process preparing the ground for this started with what were called the Bogis Bossey Dialogues in 2017 and 2018; these meetings included strong participation by business interests. In the second of the two meetings, the WEF made three presentations, including one on ‘public-private partnerships’ for biodiversity.<sup>115</sup> In a nudge towards the private sector, participants recommended “*working with particular sectors by demonstrating their impacts and dependencies on biodiversity, drawing on work such as that done by the Natural Capital Coalition*” in order to “*shape the narrative and messages for different audiences*”.<sup>116</sup>

v The World Conservation Congress in Hawai’i in September 2016 had agreed a resolution inviting “the Parties to the CBD and other stakeholders to initiate a process towards the development of an ambitious post-2020 strategy”. See IUCN, 2016.

Also of significance was the desire to have an overall outcome for the GBF that is comparable to the Paris Agreement on climate change: *“There is a need for an overall science-based target for biodiversity for 2050 that can be quantified and tracked through implementation, equivalent to the 2°C/1.5°C temperature rise cap agreed under the Paris Agreement. This target should express necessity rather than feasibility, and be science-based, succinct, positively framed, bold, and quotable.”*<sup>117</sup>

From the outset, it was clear the post-2020 plan needed to initiate a “transformative change”:

*The Global Assessment Report on Biodiversity and Ecosystem Services issued by the IPBES has cautioned that goals for conserving and sustainably using biodiversity and achieving sustainability cannot be met by current trajectories, and biodiversity goals for 2030 and beyond may only be achieved through transformative changes across economic, social, political and technological factors.*<sup>118</sup>

The GBF intends to “galvanize urgent and transformative action by Governments and all of Society”, including businesses. The success of the implementation of the framework will depend on, amongst other things, “increased efforts to address the drivers of biodiversity loss”. This clearly refers to the underlying economic drivers of biodiversity loss, including “supply, production and consumption, affluence [...]”<sup>119</sup> In other words, the very basis of many large global business activities and the source of shareholders’ profits is at stake.

However, whilst corporate lobby groups have proclaimed their intention to see an “ambitious” GBF developed, they have neglected to mention how their own activities, which broadly constitute the underlying causes of biodiversity loss, will require transformative action. Biodiversity for Nature broadly supported the initial Target 15, to “reduce impacts by 50%”, but only if were applicable to specific areas of reduction. Furthermore, such a target was “already aligned with the ambition to reduce negative impacts by at least 50% by 2030” for many big businesses.<sup>120</sup> In illustration, BfN’s lobbying position included a list of “examples of commitments made by businesses”.

From the beginning, the draft GBF target regarding consumption has been oriented towards placing the burden of responsibility for ‘unsustainable’ consumption on consumers. The only responsibility for corporations in this regard is to provide “relevant information and alternatives”, in other words the self-certification of their products. However, there is ample evidence that such certification does not provide accurate information, and furthermore paying extra for ‘responsible choices’ is only an option for the middle and upper classes in the Global North.

In other words, far from being transformative, the limited measures included in the draft GBF that relate most directly to the impacts of corporate activities fail to address unsustainable production methods. With such weak targets already more or less secured, corporate lobbyists have recently had little need to press their case. In terms of reducing actual impacts, the targets largely allow for ‘business as usual’, at least for the larger corporations. As shown below, an initial target requiring the ‘reform of economic sectors’ has become almost entirely dedicated just to corporate reporting.

## 4.2 FROM ‘BIODIVERSITY’ TO ‘NATURE’ TO ‘NATURE POSITIVE’

Pressure to use the term ‘nature’ instead of ‘biodiversity’ as a key concept in the GBF started as early as 2018. The report of the second of the Bogis Bossey Dialogues noted that “among the areas highlighted was the use of the term ‘biodiversity’: the general public understands ‘forests’, ‘oceans’, ‘nature’, but not ‘biodiversity’. The term is too abstract, and it loses meaning when translated to other languages.”<sup>121</sup> A ‘resolution’ to this problem, strongly promoted by some conservation groups in conjunction with corporate lobbyists, was the substitution of the term biodiversity with ‘nature’.

The term ‘nature’ is in fact much vaguer than ‘biodiversity’. Nature can mean anything connected with “the dynamic living system formed by the indivisible community of all life systems and living beings who are interrelated, interdependent, and complementary, which share a common destiny”.<sup>vi, 122</sup> But it can also mean “the material world, especially as surrounding humankind and existing independently of human activities” or “the elements of the natural world, as mountains, trees, animals, or rivers”. The separation this implies between humans and nature is widely discredited<sup>123</sup> and alien to many communities,

vi As “Mother Nature” or “Mother Earth” is defined by the Plurinational State of Bolivia.

especially Indigenous Peoples, who are recognised as the best guardians of biodiversity. As a paper published (with some irony) in *Nature* magazine explained:

*One of the main present occidental meanings of “nature”, designating what is opposed to humans, currently used in public policies, conservation science, or environmental ethics [...] appears rare and recent, and contradictory with most other visions of nature.*<sup>124</sup>

The term ‘natural’ is also often used to describe anything that relates to a living thing. In other words, the concept is a cultural construct.<sup>125</sup> Corporate sales tricks include the word ‘natural’ in relation to products that only have a hint of anything natural. And the biotech industry claims that artificially genetically modified organisms are also ‘natural’, simply because genetic mutations occur in nature.

In contrast, ‘biological diversity’ or ‘biodiversity’ for short, is defined by the CBD as *“the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems”*.<sup>126</sup>

It is therefore no surprise that corporate actors prefer the non-defined term ‘nature’, which is good for PR and much more difficult to monitor. Any target or goal involving this term places it in the realm of subjectivity, uncertainty and potential abuse.

The demand for using the term ‘nature’ in the GBF’s mission first appeared in September 2021 with the coining of the phrase “a Nature Positive world” in a joint statement issued to the UN General Assembly Summit on Biodiversity by business lobby groups BfN, We Mean Business and the Capitals Coalition, along with assorted conservation organisations.<sup>127</sup> The ideas set out in the 2021 Call to Action were further developed in a paper subsequently issued by many of the same authors (including the business groups) entitled ‘A Nature-Positive World: The Global Goal for Nature’.<sup>128</sup> This paper argued that *“a nature-positive goal can be set as an objective of all Multilateral environmental agreements (MEAs)”*. Likening the desired outcome of the CBD talks to the Paris Agreement, they stated that: *“Now, in the run-up to the CBD negotiations in 2021, where Parties will set new targets for biodiversity, there is a need for an equivalent science-based approach for nature.”*

The call for a ‘Nature Positive world by 2030’ has subsequently been repeated endlessly by the major business lobby groups, including BfN,<sup>129</sup> the WEF<sup>130</sup> and WBCSD.<sup>131</sup> Reflecting the congruence of interests between the corporate lobbyists and certain large conservation groups, all appeared together in a completely unbranded September 2022 video demanding the GBF goal of ‘Nature Positive by 2030’.<sup>132</sup> A representative of BfN believes governments have been listening to their messages, and noted that *“at the negotiations in Nairobi in June [2022], again we saw many countries provide support for the [proposed ‘Nature Positive’] mission, although there were further discussions to clarify the definition of ‘Nature-Positive’.”*

The proponents of ‘Nature Positive’ are evidently conscious that such obvious questions about the meaning of the term challenge the notion that this is a ‘science-based’ or credible goal for the GBF. In March 2022, in order to provide an appearance of solidity to the term, the Nature Positive coalition issued a statement entitled ‘The Measurable Nature Positive Goal for the CBD Mission’. This was yet another call for a *“Nature Positive goal”* in the GBF, and the coalition claimed that such a goal would be ‘measurable’ by *“quantifying the maintenance and improvement of natural processes, ecosystems and species over time”*.<sup>133</sup> Again, however, many of these ‘measurable processes’ are highly subjective, impermanent, imprecise and extremely complex to measure.

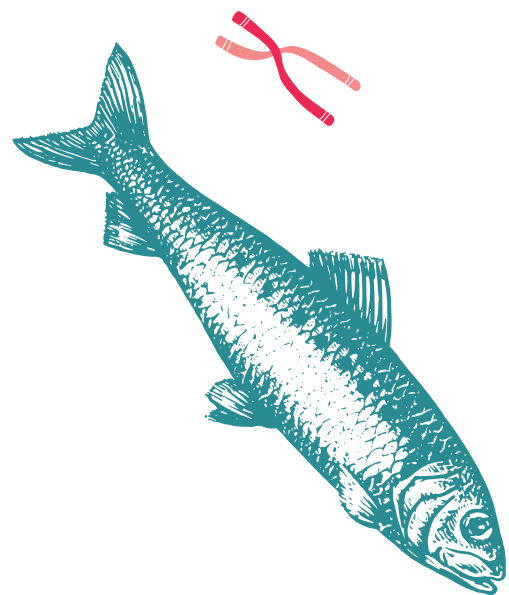
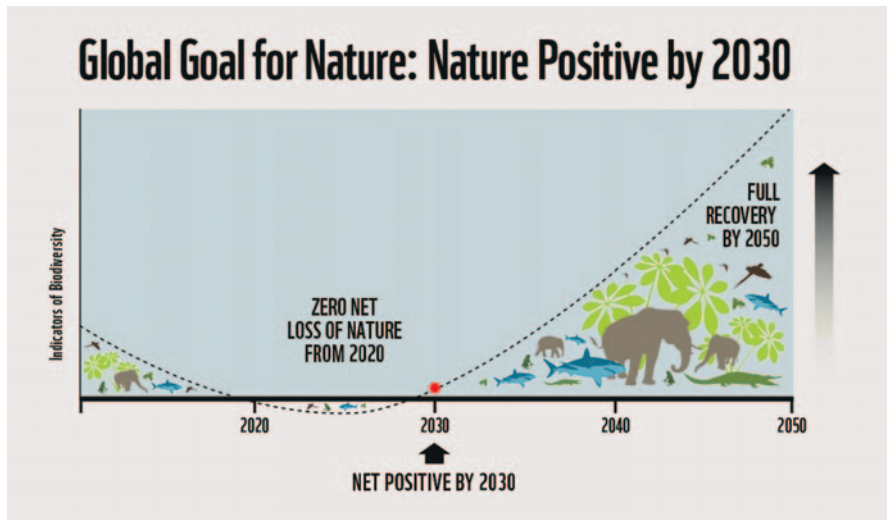




FIGURE 5 | FALSE SCIENTIFIC CLAIMS: ‘NATURE POSITIVITY’ (FOLLOWING A PERIOD OF CONTINUING BIODIVERSITY LOSS)<sup>134</sup>



Source: <https://www.naturepositive.org/> as well as a very similar graph by the CBD itself: <https://www.cbd.int/doc/c/e823/b80c/8b0e8a08470a476865e9b203/sbstta-24-03-add2-rev1-en.pdf>

Even worse than the lack of measurability is the fact that ‘Nature Positive’ would serve a similar role to ‘net zero’ on climate. As BfN states: “Our future needs to be **both net-zero and nature-positive**” [emphasis added].<sup>135</sup> Such statements, which blithely disregard the massive problems with ‘net zero’, have nevertheless been readily mimicked by the CBD’s Executive Secretary, who has said that “the world’s race towards net-zero emissions will only succeed if we race equally fast towards nature-positivity”.<sup>136</sup> ‘Nature Positive’ implies that it is okay to lose ecosystems in one place as long as they are ‘compensated’ elsewhere. This type of exchange can potentially conceal unlimited damage to actual biodiversity. In this sense, both are greenwashing instruments, and they allow corporations to destroy ecosystems while claiming to be ‘Nature Positive’.

Despite these glaring dangers, the use of terms like ‘nature’, ‘nature positivity’ and ‘nature recovery’ have gained traction in the GBF discussions under the weight of relentless lobbying by business and certain international conservation groups. In fact, all five of the alternative versions of the current draft mission of the document contain a reference to one or another of the terms.

#### 4.3 INCLUSION OF ‘NATURE-BASED SOLUTIONS’

The concept of ‘Nature-Based Solutions’ (NBS) has been presented by international conservation organisations as a means of tackling problems related to both climate and biodiversity.<sup>137</sup> The concept of purchasing carbon offsets from nature-based projects has been enthusiastically taken up by large corporations, especially heavy polluters like fossil fuel companies and airlines, as this allows them to carry on polluting while still maintaining a green image.<sup>138</sup> In fact, the implementation of NBS presents serious threats to biodiversity; not only does it allow global warming emissions to continue, but it also encourages fast-growth, high-input monoculture tree plantations on natural ecosystems such as savannahs.<sup>139</sup>

The inclusion of NBS in the GBF, linked with the demand for a ‘Nature Positive’ goal, has been a clear objective of business lobby groups and conservation groups such as WWF, TNC and IUCN. It reflects and is a specific manifestation of the growing redefinition of ‘nature’ as an ‘asset class’. The concept of ‘natural capital’, which has primarily been developed and pushed by the Natural Capital Coalition (a subgroup of the Capitals Coalition), is another related concept that threatens the integrity of global biodiversity.

Thanks to coordinated lobbying by various corporate actors using these concepts and terminology, ‘Nature-Based Solutions’ is gaining traction in the run-up to COP15. The Nature Positive coalition’s September 2020 Call to Action stated that *“the Post-2020 GBF should commit Parties to incorporate Nature-Based Solutions”*.<sup>140</sup> In order to link biodiversity and climate goals, Business for Nature Director Eva Zabey stressed the need to ensure that *“a global goal to halt and reverse nature loss by 2030 aligns with efforts to make sure Nature-Based Solutions contribute 30% of the emissions reductions needed in the coming decade to reach the goals of the Paris Agreement”*.<sup>141</sup> And according to the World Economic Forum, its Platform for Accelerating Nature-Based Solutions *“aims to catalyse political and business leadership and action towards the delivery of a nature-positive future that benefits people and planet.”*<sup>142</sup>

All versions of the draft GBF, with one exception, have included the term ‘Nature-Based Solutions’. Interestingly, the one version that didn’t introduced the idea that the CBD should provide 10GTeq of CO<sub>2</sub> global mitigation efforts, effectively providing the same offsetting services for the climate.

Elizabeth Mrema has also become a champion of NBS. Whilst cautioning of potential dangers, she has nevertheless said that *“addressing climate change means looking at Nature-Based Solutions to adaptation and mitigation”*,<sup>143</sup> and that *“nature-based climate solutions [...] could be the basis for a sustainable future”*.<sup>144</sup> On the occasion of World Tourism Day in September 2022, her public statement noted that *“the opportunity before the tourism sector today is to creatively offset emissions through Nature-Based Solutions”*.<sup>145</sup> Mrema’s support for the concept – which has not been endorsed by a COP and is known to face opposition from many parties – represents an extraordinary breach of protocol and impartiality.

#### 4.4 FROM REDUCING CORPORATE IMPACTS TO WEAK CORPORATE ACCOUNTABILITY AND REPORTING

Wording in the early draft versions of the GBF demanding actual *reductions* in corporate impacts has largely been replaced by wording about merely *reporting* on impacts.

Lobbying efforts around reporting and accountability for corporate impacts on biodiversity have come quite late in the development of the GBF. The issue has been of particular interest to the finance sector and hence, alongside Business for Nature, TNFD and the Capitals Coalition have been active.

In principle, mandatory corporate biodiversity reporting could potentially be an important and positive step. As Elizabeth Mrema has said, the data on reporting mechanisms for climate change are much more advanced than they are for biodiversity.<sup>146</sup> She added that *“the disclosure of nature-related financial information will also have implications for improved economic stability”*.<sup>147</sup>

However, this very much depends on *what* is reported, as well as *when* and *how*. A possible ‘model’ for reporting biodiversity impacts under the CBD is being developed by the Task Force for Nature-related Financial Disclosure (TNFD). This initiative has largely been driven by corporations, including members of the Natural Capital Coalition, which was closely involved in its founding. In 2021, Biodiversity for Nature argued that the GBF should *“strengthen disclosure rules in line with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations and upcoming TNFD”*.<sup>148</sup>

But a wide range of environmental and social justice campaigners are very concerned about the TNFD. In a letter to the TNFD co-chairs in May 2022,<sup>149</sup> they said that the TNFD’s draft reporting framework fails to include human rights reporting, which is essential in recognising how outcomes for nature and people are intertwined. They also stressed that the framework needs to *“explicitly require businesses to provide meaningful data of what its risks and impacts on nature and human rights are”* and *“require businesses to report meaningfully on their nature-related promises, claims and connection to severe impacts”*.

In other words, whilst BfN and the Capitals Coalition have been calling for mandatory reporting on risks and impacts to be enshrined in the GBF, the model they are proposing for this – the TNFD – fails to include reporting on precisely the most important elements for mitigating biodiversity impacts. In the opinion of one internal source consulted for this study, TNFD could *“steer the CBD even further away from the need for business to be held accountable for wrongdoing”*.

However, corporate lobbying efforts have been paying off. Mrema has strongly welcomed Business for Nature's "very strong statement" to the March 2022 OEWG meeting in Geneva about the need for mandatory reporting on financial risks and business targets, saying that this would "help [TNFD] very much".<sup>150</sup> In June 2022, following the fourth meeting of the OEWG, Business for Nature reported:

*More support than we've seen before for mandatory disclosure. [...] It's fair to say that for the Business for Nature team on the ground, the conversations felt different, with the role of business and financial institutions being acknowledged by key governments to help deliver meaningful action to halt and reverse nature loss. We saw growing interest from policymakers to understand what it will take in the Global Biodiversity Framework to scale and speed up business action. [...] We also saw significant momentum in favour of mandatory requirements for businesses and financial institutions to assess and disclose their impacts and dependencies on nature, across operations, value chains and portfolios.<sup>151</sup>*

The GBF text relating to corporate accounting and reporting is set out in what is now draft Target 15. The development of this target shows the transformation as the negotiations have progressed; it started with the explicit aim of reforming entire economic sectors and reducing impacts by a specific amount (50 per cent) but in the most recent iterations is much more focused on reporting. The remaining element of text about reducing impacts by half is currently in square brackets and may well disappear altogether. The transformation of a target about reducing corporate impacts to a target to merely report on them is nearly complete.

Corporate lobby groups have consistently been pressing for weak accounting and reporting requirements. This distracts from the fact that more onerous requirements to reduce impacts have been weakened or dropped altogether. Business for Nature has informed the author of this report that mandatory reporting "has become our top priority in the final sprint towards COP15". There are good indications that corporate entities are making use of a tactic to replace requirements for the reduction of impacts with "mandatory reporting".

#### 4.5 'MAINSTREAMING' BIODIVERSITY

The term 'mainstreaming' refers to the process of "ensuring that biodiversity, and the services it provides, are appropriately and adequately factored into policies and practices that rely [on biodiversity] and have an impact on it".<sup>152</sup> It is clearly important to ensure that (policy) decisions regarding biodiversity are not siloed in the environmental ministries where they will have little or no impact on the many areas of economic activity where biodiversity is likely to be impacted. If done effectively, mainstreaming could (and should) have important repercussions for businesses, especially those with large impacts on biodiversity. CBD COP decisions on biodiversity mainstreaming were taken in relation to agriculture, forestry, fisheries, aquaculture and tourism in 2016,<sup>153</sup> and in relation to energy and mining, infrastructure, manufacturing, processing and health at COP14 in 2018.<sup>154</sup> In each of those decisions, it is clear that no measures were approved that could possibly undermine the further development of the sectors involved.

The 2018 COP decision established an informal advisory group (IAG) to develop a 'long-term approach to mainstreaming biodiversity' (LTAM) and "to implement prior decisions of the Conference of the Parties related to the mainstreaming of biodiversity". The CBD duly set up an Informal Advisory Group (IAG), and also convened an Extended Consultative Network (ECN), even though this was not mentioned in the COP decision. The IAG was composed of an equal balance of Parties and observers, but the ECN consisted of non-parties, a number of them from industry. Comments from the ECN were actively welcomed and incorporated by the CBD Secretariat.

According to the 2018 COP decision, mainstreaming "should be one of the key elements of the post-2020 global biodiversity framework in order to achieve the transformational change required throughout society and economies, including changes in behaviour and decision-making at all levels". Yet so far, only a select group has had access to the mainstreaming process – including the World Economic Forum and the Friends of Ocean Action lobby group, although other corporate lobby groups such as Business for Nature and Ipieca have also submitted views.<sup>155</sup> According to Martin Lok of the Capitals Coalition, "we have helped shape the Long-Term Agenda for Mainstreaming". According to an internal source for this study, "many Parties and observers in the IAG and ECN did not participate much while some industry reps were very active".

Ultimately, the process was unbalanced, and it is highly unlikely that mainstreaming will play a positive role in the GBF. The draft mainstreaming decision contains a huge array of ‘proposed activities’ that clearly reflect business interests, including “achieving No Net Loss/Net Gain along supply chains”, implementing ‘Nature-Based Solutions’, pursuing biodiversity offsets and “compensation mechanisms”, promoting voluntary certification, voluntary climate and biodiversity commitments, payment for ecosystem services, and “multistakeholder platforms”.<sup>156</sup> The reduction of corporate impacts has been relegated to merely voluntary action.<sup>157</sup> Similarly, for the financial sector, the intention is that financial institutions voluntarily “*apply biodiversity risk and impact assessment policies and processes*”.

The CBD as a whole has not discussed the LTAM nor its Action Plan at any time during the GBF negotiations. Concerns about the procedures for developing these documents have repeatedly been raised by civil society<sup>158</sup> but have been largely ignored. Despite the lack of proper discussion of the LTAM, there was an attempt to have them ushered through at the third meeting of the Subsidiary Body on Implementation (SBI-3) meeting in March 2022, though this was ultimately rejected by Parties.

The fact that the LTAM mirrors Targets 14 to 16 of the GBF makes the weakness and corporate-orientation of its implementation plans starkly visible.

#### 4.6 GENETICS, BIOTECH AND THE CBD

The Convention on Biological Diversity was negotiated as the biotech industry was rising in significance. The consequence is that concerns about genetic resources and the risks and impacts of biotech were built into the framing of the convention and have driven the development of three associated protocols.

As a result, there have been several main areas of industry-related interest around the CBD’s mandate in relation to biotechnology and genetic resources. These include the development of terminator technology; synthetic biology, including the issue of gene drives and the split-off issue of digital sequence information (DSI); genetically engineered trees and biofuels; biosafety, liability and redress from harm caused by GMOs; and access and benefit sharing (ABS).

As such, the CBD and its protocols have become the key international fora governing the biotechnology industry. In return, the industry has founded or supported a range of differentiated international lobby networks such as CropLife (business), PRRI (biotech academics, including regulators), ISAAA (biotech outreach and capacity building for farmers), Cornell Alliance for Science (a pro-biotech alliance, largely funded by the Gates Foundation) and others (more details on some of them can be found in Section 3.1).

#### Synthetic biology and gene drives

The importance of synthetic biology (synbio for short) with regard to its potential impacts is overarching. Synbio was introduced as a “new and emerging issue” in 2010 and has been subject to several decisions and a growing dedicated workstream under the CBD. However, until now, the financial interests behind biotech – well-represented by some Parties – keep working to push it entirely off the agenda, declaring it doesn’t meet “all” the criteria for a new and emerging issue.<sup>vii</sup> According to an inside source interviewed for this report, representatives of business networks as well as of individual synbio companies (e.g. Evolva, which produces synbio vanillin), continue to lobby at CBD meetings to establish the repeated mention of ‘benefits’ and ‘innovation’ in CBD texts. They do this simply through claims, and without any actual and verifiable proof.

One particular application of synthetic biology is gene drives. Gene drives are built to intentionally spread their implanted traits of selected or modified genetic features through an entire population and could easily be designed to cause a whole species to become replaced or extinct.<sup>159</sup>

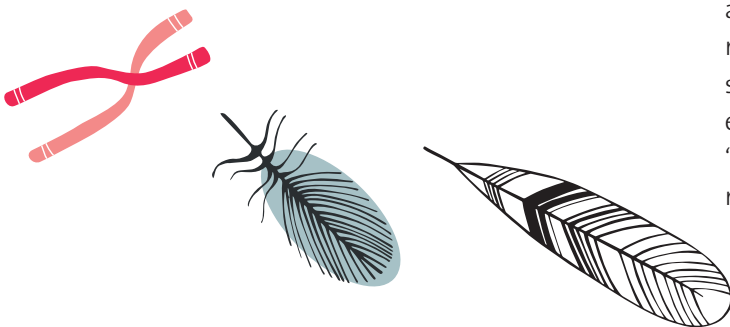
In an open letter published in 2016, leaders and practitioners in the fields of science, policy, environmental protection and conservation, said:

*“Gene drives have the potential to dramatically transform our natural world...[they]... give[s] technicians the ability to intervene in evolution, to engineer the fate of an entire species, to dramatically modify ecosystems, and to unleash large-scale environmental changes, in ways never thought possible before...We the undersigned are alarmed that some conservation organizations have accepted funding for and are promoting the release of engineered gene drive organisms into the wild.”<sup>160</sup>*

vii The set of criteria for new and emerging issues should by definition be a non-exhaustive list: some of the criteria are contradictory or not compatible with one another, implying that issues should comply with only some of them.

In 2017, an Online Forum<sup>viii</sup> discussing how the CBD should deal with the risks related to gene drives, including considerations about a possible moratorium, was skewed by the lobby firm ‘Emerging Ag’, which had been paid \$1.6 million by the Bill and Melinda Gates Foundation (see Section 3.1). The influencing was done by recruiting dozens of experts to influence countries’ positions on a possible moratorium. This was revealed in the ‘Gene Drive Files’<sup>161</sup> published by civil society groups, following freedom of information requests and other investigations.

The revelation that there had been a organised attempt to coordinate and script responses of seemingly independent experts during the CBD’s consultation on the technology, together with strong pressure from civil society, led to the CBD adopting procedures in 2018 to avoid and manage conflicts of interest – at least in expert groups.<sup>162</sup> However, lobbying from a biotech interest perspective and influencing the CBD’s position towards minimal regulation has continued. Several interviewees for this report specifically mentioned the active role played by Target Malaria to this end. This group describes itself as a ‘vector control research alliance’. It has argued that research and development—including the environmental release – of gene drive technology can benefit conservation and public health.<sup>163</sup> It has therefore argued against a moratorium, and against any special regulation or governance,<sup>164</sup> despite the capacity for unprecedented levels of risk, including the spread of gene drive organisms across national boundaries. This contrasts with the core task of the CBD to set binding rules and protocols, particularly in relation to environmental and ecosystem integrity and to the prevention of potential serious environmental harm.



Companies with vested interest in the access to and use of genetic resources for their products or research, especially related to modern biotechnology, have been involved in the CBD in a concerning way.<sup>165</sup> As can be seen from Figure 2, some of the largest delegations of corporate lobbyists participating in CBD meetings have been from those related to genetic technologies, such as the Global Industry Coalition and CropLife International. As Corporate Europe Observatory noted in 2018:

*“New genetic engineering techniques like gene editing, Synthetic Biology and gene drives are increasingly the subject of attention and debate at a global level. Environmental groups and many amongst the scientific and farming communities are calling for strict regulation of these new techniques and for a global moratorium on gene drives in the interest of public health and the environment. But biotech corporations are lobbying hard to avoid regulation and oppose any bans.”<sup>166</sup>*

## Biosafety

Corporations involved in biotechnologies are concerned about biosafety regulations in the CBD. For example, the requirements of the ‘precautionary approach’ as established under the Cartagena Protocol potentially prevent the unrestrained genetic manipulation of living organisms, and their release into the open environment.

The specific interest here of biotech businesses is to ensure minimal regulation and risk assessment requirements. Whilst the strongest efforts have been observed to come from the agribusiness sector, such as GM seed and herbicide companies, other sectors that have stepped forward and lobbied hard include those focused on genetically modified fish, trees and insects. Their participation varies according to the specific topics at hand, but all the relevant companies or industry-linked R&D groups from university departments are present when their interests are at stake. Their role is mainly to assert benefit claims and pretend they are real, to shrug off the risks, to distract or mislead the CBD from ensuring biodiversity protection, and to push it towards ‘innovation’. See the end of this section for the specific methods used.

viii Online fora can’t take decisions in the CBD, but they are the basis for a) the background information the Secretariat prepares for the work of an Ad Hoc Technical Expert Group (AHTEG) and b) the selection of participants in such an AHTEG.

## Access and benefit sharing & digital sequence information

Access and benefit sharing is of interest to a wider group of companies: those that have genetic resources or genetic information or those that exploit them. This includes those using genes or genetic sequences for diverse genetic engineering and production purposes. In particular, sectors such as agriculture and food, pharmaceuticals and health, energy, cosmetics, and forestry are involved. There are many companies – and university research groups with links to industry – that seek to ensure that such genetic information is freely available for their use in research and development, and subject neither to regulation nor compensation.

The technological reality for some years now is that genetic resources can easily be turned into various forms of digital sequences and that an increasing number of genetic resources can be accessed as digital sequence information (DSI) rather than as biological material. Users can thereby avoid benefit sharing, both by synthesising materials from digital sequences and by using the DSI itself for commercial purposes,<sup>167</sup> e.g., by the pharma industry, and for research, development, patenting, and profitable research spin-offs.

What this means for Indigenous Peoples, and countries from the global south, is that any genetic resource can be scanned and become available for research and development. The proposed “open access” to all digital sequences information undermines the requirements for Free Prior and Informed Consent of Indigenous Peoples and Local Communities (IPLCs), for example regarding the use of their traditional knowledge of medicinal plants.

The ongoing debate in the CBD circles around the questions of which type of information will be covered under DSI, and whether DSI falls under the rules of the current access and benefit sharing regime. The issue is perceived by many as a potential deal-breaker for overall agreements at COP15.

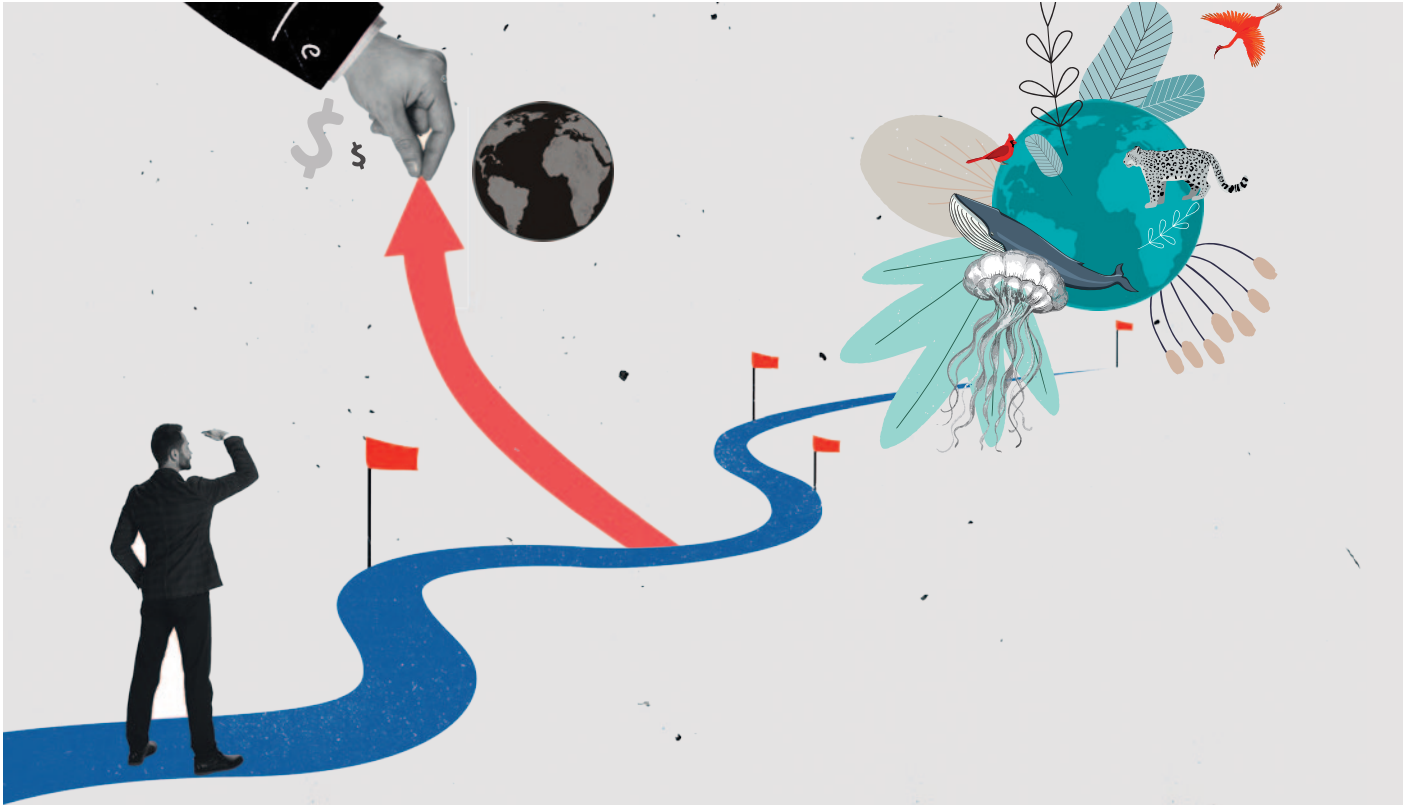
## Methods of influencing used by the biotech industry

The role of corporations in the CBD has been obscured by channelling lobbying efforts through other lobby groups, such as the Public Research and Regulation Initiative (PRRI) which, though ostensibly representing a sub-group of ‘public sector scientists’, has close ties with the biotech industry and government regulators. According to Corporate Europe Observatory, important work in the CBD and under the Cartagena Protocol on Biosafety (CPB) on risk assessment of living modified organisms was terminated under pressure from some of the same delegations also participating in the PRRI group.<sup>168</sup> An inside source reported that PRRI acted as a coordination hub between lobby groups and industry-related delegates. The official endorsement of a major and long-awaited CBD/CPB guidance document on biosafety was blocked, and ongoing biosafety work stalled for at least four years.

Biotech companies and related interests have been the most prolific in introducing representatives into national delegations to the CBD. Investigations for this report, for example, have found that half of the six-person delegation of Mali at the COP14 in 2018 in Sharm el Sheik was in fact working for Target Malaria, though none of them were described in the official CBD participants list as such.<sup>169</sup> Similarly, ISAAA sponsored or provided members for other African delegations. Likewise, Target Malaria staff were members of the Uganda and Burkina Faso delegations, though listed under different institutions. Linked to Target Malaria, Imperial College itself brought at least eight experts to COP14, including communication and policy experts.<sup>170,171</sup>

As addressed in Section 4.2 of this report, there has been a strong push – both directly and indirectly – from business interests for the word ‘nature’ to feature prominently in the outcome of the GBF negotiations. This can potentially serve the purposes of biotech companies as well, as artificial gene editing techniques, as well as engineered gene drives, are claimed to be comparable to what happens in ‘nature’. For example, the Gates-funded Target Malaria group cites Professor Austin Burt as saying: “*Gene drive is a genetic phenomenon that occurs in nature and causes a selected trait to spread rapidly through a species via sexual reproduction over several generations*”.<sup>172</sup> This claim of the basic ‘naturalness’ of gene drives is narrowly associated with gene drive developers and has been dismissed by independent scientists.<sup>173</sup>





## 5.1 THE 'FINAL SPRINT' FOR BUSINESS: THE RUN-UP TO COP15

In September 2022, Business for Nature launched what it called the “final sprint” towards COP15.<sup>174</sup> Alongside the ongoing call for ‘Nature Positive by 2030’, business lobby groups are specifically seeking the adoption of mandatory requirements for “*all large businesses and financial institutions to assess and disclose their impacts and dependencies on nature by 2030*”.<sup>175</sup>

In principle, the mandatory reporting of biodiversity impacts could be a positive and important step; however, a concern is that the actual requirements of reporting could be extremely weak, e.g. under the TNFD reporting framework. Business for Nature is calling on businesses worldwide to join the call to ‘Make it Mandatory’ and has even produced a glossy video campaign to support this demand.<sup>176</sup>



There will be a concerted effort by business lobby groups to achieve their objectives before and during the COP meeting in Montreal in December. Business for Nature has said that *“We will need to show business leadership by inviting CEOs/C-suite from progressive companies to actively participate in COP15 in Montreal. We hope to work with China, Canada and the Convention on Biological Diversity to make sure the presence and engagement from business is facilitated.”*<sup>177</sup> BfN stimulated signatories to its ‘ambition statement’ on assessment and disclosure, encouraging businesses to *“express interest”* in attending the COP, and will coordinate participation. There will be a Business Action Hub on 9<sup>th</sup>-10<sup>th</sup> December to *“showcase how businesses are acting on nature”*,<sup>178</sup> a Business Forum from December 12<sup>th</sup>-13<sup>th</sup>, and a Finance Day on the 13<sup>th</sup>.<sup>179</sup> Corporate leaders will make commitments concerning biodiversity during the COP Action Days from December 15<sup>th</sup>-16<sup>th</sup>. The TNFD Secretariat will also host a meeting during the COP.

There will also be a parallel World Biodiversity Summit organised by the corporate-backed World Climate Foundation on December 11<sup>th</sup>.<sup>180</sup> The theme will be ‘Accelerating Public-Private Partnerships, Innovations and Investments for Nature’, and the summit will include sessions on ‘Business and Finance for Biodiversity: Closing the Nature Finance Gap’, ‘Innovating our Economy for a Nature-Positive Future’ and ‘Catalysing Sustainable Solutions for Natural Capital’.

## 5.2 BEYOND COP15 AND THE GLOBAL BIODIVERSITY FRAMEWORK

Business interest in the CBD will not end with the adoption of a Global Biodiversity Framework. The content of the ‘monitoring plan’ for the GBF may also be significant, as it will contain the details of what exactly will be monitored and reported on in respect to the implementation of the GBF. Business groups are likely to take an interest in this process.

Business for Nature has already stated its priorities beyond the COP. For 2022-2024, the group hopes to *“create a business-government dialogue in 4 countries (India, South Africa, Malaysia, Colombia) to inform the development of the business chapter of CBD NBSAPs”*.<sup>181</sup> In other words, businesses’ key lobby groups on environmental issues will seek to influence essential and highly biodiverse countries on the way that their National Biodiversity Strategies and Action Plans are formulated. There is no doubt that the various and separate WBCSD-related national organisations inside BfN will also be aiming to exert such influence.



The draft GBF increasingly bears the strong hallmarks of lobbying by business interests. It is difficult to disentangle what has resulted specifically from corporate lobbying from what certain Parties might have desired anyway, given their strong disposition towards ‘non-regulation’, voluntary action, market mechanisms, private sector implementation, and weak or non-existent monitoring, reporting and corporate accountability. Businesses in many countries are ‘pushing at doors’ that are already permanently open to them. The picture is further obscured by the collaboration of most of the major corporate lobbying groups with certain international conservation organisations. The lobbying of these groups has converged and merged around many issues.

But the consequences are clear: the GBF lacks the ‘transformational’ measures required by the biodiversity crisis. The chance for a global agreement that is able to address the underlying drivers of biodiversity, transform economic sectors, initiate measures to reduce consumption, and hold corporations to account, seems to be lost.

To achieve their desired results, corporations have used a variety of tactics and strategies to influence the CBD processes, including the following: direct party lobbying; targeting individual delegations or becoming part of them; installing direct contacts in the CBD Secretariat; making use of revolving doors; co-opting civil society, academia and think tanks; funding UN activities; the distortion of language and concepts; and public-private partnerships.

One strategy specifically stands out: the formation of purpose-built lobbying groupings. Corporations seek to present themselves as 'the willing' by claiming to be part of the solution and advocating for sustainability via coalitions with green-sounding names. Their 'solutions' are carefully crafted in order not to undermine their business model; they ultimately also do nothing for the environment. Some of these 'solutions' include offsetting (for example under the names of 'No Net Loss', 'Net Gain', 'Nature Positive' and 'Nature-Based Solutions'), self-reporting, self-regulating and self-certifying. Interestingly, many of the corporations with the worse track records on environmental and human rights behaviour are very much involved in such coalitions.

This reflects the fundamental conflict of interest: corporations and their operations are the most important contributors to biodiversity loss and ecosystem destruction. They are also accountable to their shareholders, to whom they pay dividends.<sup>182</sup> As the profound transformation of the economic sectors that damage biodiversity would certainly lead to diminished operating space and thus reduced income for these corporate entities, it seems logical that they have a responsibility towards their shareholders to prevent such a transformation.

While business interests have been actively influencing UN processes since the negotiation of the Rio Conventions in the early 1990s, it is clear that corporate presence has increased significantly over the past few years. The UN system in general, and the CBD in particular, have been progressively more welcoming to corporate actors, actively setting up mechanisms to involve them in decision making processes. The appearance of business-oriented units in the CBD Secretariat, the inclusion of business representatives in Ad-Hoc Technical Expert Groups and other expert working groups, the pre-COP business fora, and ultimately the warm welcoming statements for business from the Executive Secretary, are all signs of such an evolution.

Corporate narratives have also become increasingly misleading. Each year, new PR-friendly 'solutions' are presented, one more ineffective than the other in addressing the real environmental challenges of our era. Yet, through the profound infiltration of UN bodies, governments, and even civil society entities, these concepts are gaining terrain amongst policymakers and in final outcomes.

## The environment and the peoples are the ones who lose.





Addressing corporate capture of the CBD is crucial for addressing the underlying drivers of biodiversity loss. Several general recommendations for the whole UN system, as well as a number of CBD-specific recommendations, should be taken into account. The UN and its Member States should reiterate that their overriding prerogative is to serve the public interest, and should overhaul decision-making processes to ensure that industry's influence is limited.<sup>183</sup>

**Our general recommendations for the entire UN system are as follows:**

- The UN and its Member States must resist corporate pressure to grant business a privileged position in UN negotiations.
- The UN and its Member States should take resolute action to strengthen transparency around lobbying.
- Business representatives should not be part of national delegations involved in UN negotiations.
- The role of the 'business and industry' major group should be limited. As the business sector holds significantly larger resources than any other sector, there should be a cap on its participation; business should not have more representatives than any of the other major groups in multilateral negotiation processes.

- The UN must disclose all existing relations and links with the private sector.
- A code of conduct for UN officials, including a ‘cooling off’ period during which officials cannot start working for lobby groups or lobbying advisory firms, should be introduced.
- The UN should end all existing partnerships with corporations and trade associations and should not engage in any further partnerships.
- The UN, in serving the public interest, should monitor the impacts of corporations on people and the environment and establish a legally binding framework of obligations that can hold companies accountable to environmental, human rights and labour rights law. This should include an obligation for companies to report on their social and environmental impacts.
- Frameworks for addressing disclosure and conflict of interest in the CBD and its subsidiary bodies should be put in place, including amongst others:
  - A definition of conflict of interest for the purposes of the implementation of such a framework;
  - A procedure to require disclosure of interests by an actor seeking to hold a decision-making position in advance of the appointment, and the maintenance of an active register of interests during the term of appointment;
  - A procedure to ensure full disclosure of any potential or existing conflict of interest by any person participating in CBD processes;
  - A procedure to identify, avoid and manage conflicts of interest between the interests of a non-Party observer (particularly business, commercial and financial interests) and the objective, purpose and principles of the Convention;
  - A procedure to identify, avoid and manage other risks, such as undue influence of business, commercial and financial interests, associated with the participation of non-Party observers;
  - A set of provisions to ensure the implementation of due diligence, transparency and accountability of all the actors involved in such participation, with a view to safeguarding the integrity of the CBD; and
  - A mechanism for the monitoring and review of the implementation of the framework itself.

**Specifically for the CBD, the following recommendations should be implemented:<sup>184</sup>**

- A differentiation between rightsholders and stakeholders must be put in place. Rightsholders should have a voice regarding policies that affect the territories and ecosystems they live in.
- Corporations should not be part of decision-making processes and should not have a vote. There should be no negotiation with corporations. They can only be invited to give input on the feasibility of certain proposals, but this should not be a defining factor in decision making. This applies to all CBD processes, but particularly regarding the Ad-Hoc Technical Expert Groups and other committees that propose input for decision texts.
- The processes regarding mainstreaming biodiversity in all sectors should be based solely upon input from Parties and rightsholders. All proposed measures should be evaluated to understand how much they effectively contribute to environmental improvement and how much they benefit corporations.
- The Extended Consultative Network should not be prolonged and should not have a say in the further development of mainstreaming work.



# ANNEX

## BUSINESS FOR NATURE'S PARTNER ORGANISATIONS

### **WBCSD-related, national affiliates**

WBCSD, One Planet Business for Biodiversity (OP2B), Argentina (CEADs), Australia, (BCSD Australia), Brazil (CEBDS), Chile (Acción Empresas), China (CBCSD), Colombia (CECODES), Greece (SEVBCSD), Hungary (BCSDH), Indonesia (IBCSD), Portugal (BCSD Portugal), US (US BCSD)

### **National/regional corporate industry/ 'sustainability' lobby groups**

Confederation of Indian Industry, Entreprises pour l'Environnement (EpE, France), Society of Enterprise and Ecology (SEE, China), ASEAN CSR Network, Confederação das Associações Económicas de Moçambique (Mozambique), Japan Business Initiative for Biodiversity, Keidanren Committee on Nature Conservation (KCNC, Japan Business Federation), Alianza Empresarial para el Desarrollo (AED, Costa Rica), CentraRSE en Guatemala, Fundación Hondureña de Responsabilidad Social Empresarial (FUNAHRSE, Honduras), The Shift (Belgium), FIBS (Scandinavia), Orée (France), Business in the Community Ireland, Responsible Business Forum (Poland), Forética (Spain), OBU – The Association for Sustainable Business (Switzerland), Maatschappelijk Verantwoord Ondernemen (MVO, Netherlands), Netherlands Water Partnership, Council for Sustainable Business (UK), CSR Ukraine, Alianza Mexicana de Biodiversidad y Negocios (Mexico), Asociación Nacional de Empresarios de Colombia (ANDI), Perú Sostenible

### **General/sectoral 'corporate sustainability'/ front organisations/groups**

We Mean Business Coalition, Capitals Coalition, Accounting for Sustainability, Biodiversity in Good Company, Business Fights Poverty, International Platform for Insetting, Science Based Targets Network, The B Team, Union for Ethical Biotrade, World Ocean Council, Global Cement and Concrete Association (GCCA), Roundtable on Sustainable Biomaterials (RSB), Sustainable Agriculture Initiative Platform (SAI), Textile Exchange, European Outdoor Conservation Organisation (EOCA), Wildlife Habitat Council

### **Conservation organisations**

WWF, IUCN, The Nature Conservancy, African Wildlife Foundation, BirdLife International, Born Free Foundation, Conservation International, Earthwatch Europe, A Rocha Ghana, Endangered Wildlife Trust (South Africa), Sustainable Landscape Finance Coalition

### **Academia, think-tanks, funding agencies, others**

Climate Catalyst, Carbon Disclosure Project, Cambridge Institute for Sustainability Leadership, Forum for the Future, Global Environment Facility, Tropical Forest Alliance, UNEP-WCMC, World Resources Institute, Food and Land Use Coalition, International Center for Environmental Education & Community Development (ICENECDEV, Cameroon)



## ACRONYMS USED IN THE TEXT

<b>BfN</b>	Business for Nature
<b>CBD</b>	The Convention on Biological Diversity
<b>CBDA</b>	The CBD Alliance (civil society coalition)
<b>CEBDS</b>	Conselho Empresarial Brasileiro para o Desenvolvimento Sustentável (Brazilian Business Council for Sustainable Development)
<b>CEO</b>	Corporate Europe Observatory
<b>COP</b>	Conference of Parties (of the CBD)
<b>ECN</b>	Extended Consultative Network
<b>ESCRN</b>	International Network for Economic, Social and Cultural Rights
<b>FBF</b>	Finance for Biodiversity Foundation
<b>FfN</b>	Finance for Nature
<b>FIAN</b>	FoodFirst Information and Action Network
<b>FoAA</b>	Friends of Ocean Action
<b>FoEI</b>	Friends of the Earth International
<b>GBF</b>	Post-2020 Global Biodiversity Framework (of the CBD)
<b>GIZ</b>	Deutsche Gesellschaft für Internationale Zusammenarbeit (German Society for International Cooperation)
<b>GPBB</b>	Global Partnership for Business and Biodiversity (of the CBD)
<b>GYBN</b>	Global Youth Biodiversity Network
<b>IAG</b>	Informal Advisory Group
<b>ICC</b>	International Chamber of Commerce
<b>IPBES</b>	Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services
<b>Ipieca</b>	International Petroleum Industry Environmental Conservation Association
<b>LTAM</b>	Long-term approach to mainstreaming (biodiversity)
<b>NBSAP</b>	National Biodiversity Strategies and Action Plans
<b>PBAB</b>	Private Business Action for Biodiversity (programme of GIZ)
<b>PRRI</b>	Public Research and Regulation Initiative
<b>SBTN</b>	Science-Based Targets Network
<b>SCBD</b>	The Secretariat of the CBD
<b>TNCs</b>	Transnational Corporations
<b>TNFD</b>	The Taskforce on Nature-related Financial Disclosures
<b>UNCED</b>	1992 UN Conference on Environment and Development
<b>UNDP</b>	United Nations Development Program
<b>UNCTC</b>	UN Centre for Transnational Corporations
<b>UNEP-FI</b>	United Nations Environment Programme Private Finance Initiative
<b>UNESCO</b>	The United Nations Educational, Scientific and Cultural Organization
<b>UNFCCC</b>	UN Framework Convention on Climate Change
<b>UNGC</b>	United Nations Global Compact
<b>UNICEF</b>	The United Nations Children's Fund
<b>WBCSD</b>	World Business Council for Sustainable Development
<b>WBN</b>	World Biodiversity Network
<b>WEF</b>	World Economic Forum
<b>WHO</b>	World Health Organisation
<b>WMBC</b>	We Mean Business Coalition



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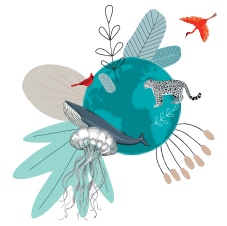
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# THE NATURE OF BUSINESS:

## CORPORATE INFLUENCE OVER THE CONVENTION ON BIOLOGICAL DIVERSITY AND THE GLOBAL BIODIVERSITY FRAMEWORK

DECEMBER | 2022



*The development of the Global Biodiversity Framework, at this very critical juncture for humanity and the planet, must fully reflect the magnitude of the biodiversity crisis, which is intrinsically linked with the crises of global inequality and the climate, food and health crises. To address all these interlinked crises, the CBD needs to step up and provide a framework that changes the current political-economic systems. Particularly, it needs to regulate all the sectors which are the main drivers for biodiversity loss: industrial agriculture, mining and energy, infrastructure, and industry. Such regulation would need to significantly reduce the negative environmental impacts, which would almost certainly imply significant impacts on the profits of these industries. To prevent them from undermining such efforts, the participation of corporate actors in the CBD must be seriously restricted, and greenwashing proposals should be off the table, including offsetting, self-reporting, self-certification and self-regulation. On the contrary, Indigenous Peoples, Local Communities and other rightsholders should be empowered and supported in their efforts to maintain biodiversity.*

### FRIENDS OF THE EARTH GROUPS AROUND THE WORLD



#### Africa

Cameroon  
Ghana  
Liberia  
Mali  
Mozambique  
Nigeria  
Sierra Leone  
South Africa  
Tanzania  
Togo  
Uganda

#### Asia Pacific

Australia  
Bangladesh  
East Timor  
India  
Indonesia  
Japan  
Malaysia  
Nepal  
Palestine  
Papua New Guinea  
Philippines  
Russia  
South Korea  
Sri Lanka

#### Europe

Albania  
Austria  
Belgium (*Flanders & Brussels*)  
Belgium (*Wallonia & Brussels*)  
Bosnia and Herzegovina  
Bulgaria  
Croatia  
Cyprus  
Czech Republic  
Denmark  
England, Wales and Northern Ireland  
Estonia  
Finland  
France  
Georgia  
Germany

Hungary  
Ireland  
Latvia  
Lithuania  
Luxembourg  
Malta  
Netherlands  
North Macedonia  
Norway  
Poland  
Russia  
Scotland  
Slovakia  
Slovenia  
Spain  
Sweden  
Switzerland

#### Latin America and Caribbean

Argentina  
Brazil  
Chile  
Colombia  
Costa Rica  
Curaçao  
Ecuador  
El Salvador  
Grenada  
Haiti  
Honduras  
Mexico  
Paraguay  
Uruguay

#### Canada and the US

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United States

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