

Whole-of-society in practice: Emerging questions from the First Global Review under the Kunming-Montreal Global Biodiversity Framework

KEY MESSAGES

- While the Kunming-Montreal Global Biodiversity Framework (KMGBF)'s whole-of-society approach is commendable, its success depends on ensuring that contributions from non-state actors are meaningfully reflected throughout planning, monitoring, reporting, and review (PMRR) processes.
- The first review cycle suggests that current arrangements may disproportionately favour well-resourced and formally established actors, potentially limiting participation by underrepresented groups that the KMGBF explicitly seeks to engage, especially actors operating in contexts where civic space is constrained.
- Limited transparency regarding objections and the subsequent review decisions creates uncertainty about how contributions are reviewed and whether they receive equal consideration. Addressing these concerns is not merely a procedural matter; it is important for the credibility and legitimacy of the Global Review process.
- COP17 should take steps to strengthen the PMRR framework ahead of the second Global Review in 2030, including by improving transparency regarding objections and review decisions and enhancing support for underrepresented actors.

Executive Summary

The KMGBF's whole-of-society ambitionⁱ requires the meaningful recognition of contributions from diverse actors beyond national governments. As COP17 takes place and Parties consider the findings of the first Global Review of KMGBF implementation, it is both timely and necessary to reflect on how this ambition is being translated into practice, including how contributions from non-state actors are recognized and reflected in review processes. Drawing on documentation of the review process and Danmission's experience of engaging with it, this discussion paper explores emerging questions regarding the recognition of non-state contributions within the review framework and identifies potential areas for further dialogue and consideration.

From whole-of-society ambition to Global Review

The KMGBF, particularly Targets 21 and 22ⁱⁱ, places participation, knowledge and rights at the centre of implementation. Reflecting this principle, non-state contributions have been progressively integrated into the PMRR through COP decisions. Decision 15/6ⁱⁱⁱ established an enhanced multidimensional approach to PMRR and identified information on non-state actor commitments as one of its seven elements. Building on this foundation, Decision 16/32^{iv} adopted a reporting process and template for commitments by actors other than national Governments and recognized such commitments as a source of information for both the Global Report and the Global Review.

By the cutoff deadline for analysis on 28 February 2026, 4,759 commitments had been submitted by non-state actors through a dedicated commitments portal of the Online Reporting Tool (ORT)^v. Of these, 180 commitments were synthesised, and 10 significant case studies were highlighted in the latest draft of this report. This provides an important flow of information on contributions beyond governmental actions. However, whether the process has been 'conducted in a comprehensive, facilitative, efficient, inclusive and transparent manner' envisioned in Decision 16/32 requires a closer examination.

Barriers to entry: Who can participate?

According to the ORT guidance^{vi}, organizations must first complete a registration process before submitting commitments. For organizations that are not accredited with the Convention on Biological Diversity (CBD), this includes providing a document demonstrating their legal status. While these requirements may help ensure the credibility of commitments submitted through the system, concerns have been raised that they may create barriers for youth and women's networks, Indigenous Peoples, local communities, and grassroots collectives that operate through informal, customary or community-based governance structures and may not be formally registered as legal entities^{vii}.

Beyond legal requirements, limited time, technical capacity and financial resources may further constrain participation and create structural advantages for actors that are already visible and well-represented within international governance processes. The composition of the 180 commitments analysed for the Global Report offers^{viii} some insight into these challenges. The geographical distribution of commitments was heavily concentrated in Western Europe and other States region¹ (around 75 per cent), with substantially smaller shares coming from other regions. The majority were submitted by non-governmental organizations, while comparatively few were provided by organizations representing business and industry, financial institutions, academia and research, youth, women, Indigenous People, and local communities. These patterns may warrant further reflection on the accessibility of the current system and the diversity of actors it is able to capture.

From submission to recognition: Are contributions visible throughout the process?

Once validated, commitments submitted through the commitments portal of the ORT are reviewed by the relevant CBD national focal points and published after a four-week non-objection period. A similar non-objection procedure applies to the selection of illustrative case studies for the Global Report. While the platform is intended to strengthen communication and dialogue between governments and their partners^{ix}, the publication and visibility of commitments remain closely linked to Party review processes. This dynamic can be observed in the preparation of the Global Report, where five of the fifteen case studies included in the first draft^x were not retained in the revised version following review by relevant Parties. Comparable information is not publicly available for commitments submitted through the ORT. Nevertheless, these experiences raise questions regarding how visible non-state contributions remain throughout the review process and whether the KMGBF's whole-of-society ambition is consistently reflected in practice.

How are review decisions communicated and justified?

While the PMRR framework provides relatively clear mechanisms for non-state actors to communicate and share commitments, the procedures and criteria governing how such commitments are handled when challenged, revised or excluded remain less clearly defined. If a Party objects to a commitment, are reasons required to be provided? Is there a consistent set of criteria against which objections are assessed? Can submitters respond to concerns or appeal decisions? Where commitments are modified, withheld or excluded, it remains unclear whether these decisions and their justifications will be communicated with the submitting organizations or made publicly available. Documentation of the review process has so far provided limited clarity regarding these questions. Danmission's experience^{xi}, in which a proposed case study was included in the first draft but not retained in the revised version following an objection from a Party, suggests that these questions are not merely theoretical. At the time of writing, requests for clarification regarding the reasons for the exclusion have not received a response. As the PMRR framework continues to evolve, transparency and accountability within the PMRR framework may warrant further consideration.

Emerging considerations for the PMRR framework

The current mechanism represents a significant step towards integrating non-state contributions into the implementation and review of the KMGBF. At the same time, the first review cycle highlights several questions regarding accessibility, visibility, transparency and accountability within a Party-driven process. These questions may warrant further dialogue among Parties and stakeholders committed to inclusive and meaningful participation in biodiversity governance. With COP17 marking the first Global Review of KMGBF implementation, lessons emerging from this process should inform efforts to strengthen the PMRR framework ahead of the second Global Review in 2030, including through enhanced support for underrepresented actors and greater transparency in the application of the non-objection process.

¹ Western Europe and Others Group (WEOG) is a United Nations regional grouping of 28 members, including Western European countries as well as Australia, Canada, New Zealand and Israel. The United States participates in the group as an observer and is considered to be a member of the group for electoral purposes.

References

- ⁱ CBD. 2022. [Decision 15/4: Kunming-Montreal Global Biodiversity Framework](#)
- ⁱⁱ CBD. 2022. [Decision 15/4: Kunming-Montreal Global Biodiversity Framework](#)
- ⁱⁱⁱ CBD. 2022. [Decision 15/6: Mechanisms for planning, monitoring, reporting and review.](#)
- ^{iv} CBD. 2025. [Decision 16/32: Mechanisms for planning, monitoring, reporting and review, including the global review of collective progress in the implementation of the Kunming-Montreal Global Biodiversity Framework to be conducted at the seventeenth and nineteenth meetings of the Conference of the Parties](#)
- ^v CBD. 2026. [Draft global report on collective progress in the implementation of the KMGBF](#). 28th meeting of the SBSTTA.
- ^{vi} CBD. [ORT: How to Submit Commitments by Actors Other than National Governments.](#)
- ^{vii} Tatpati M. 2026. *Whose Commitments Count? Making Whole-of-Society Real in KM-GBF Reporting*. CBD Alliance. Available from: <https://cbd-alliance.org/en/2026/whose-commitments-count-making-whole-society-real-km-gbf-reporting>
- ^{viii} CBD. 2026. [Draft global report on collective progress in the implementation of the KMGBF](#). 28th meeting of the SBSTTA.
- ^{ix} CBD. 2025. [Whole-of-society contributions will receive visibility they deserve](#)
- ^x CBD. 2026. [First draft of the global report of collective progress in the implementation of the KMGBF](#)
- ^{xi} Danmission. 2026. [ORT: Commitments from actors other than national Government.](#)
- CBD. 2026. [First draft of the global report on collective progress in the implementation of the Framework](#). Pp. 229



Danmission's commitment to the KMGBF