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**Third Sector Across Two Realms: International and
Domestic Norm Dynamics of Chinese Environmental
NGOs**

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Abstract

The Belt and Road Green Development Coalition, established in 2019, was created for the purpose of developing a set of ‘green’ project development standards to be utilized by Chinese and BRI host country stakeholders in the construction of BRI projects. These forthcoming standards are reflected in BRIGC reports and informed by an assemblage of industry, government, and NGO actors. Curiously, environmental NGOs (eNGOs) with outsized impacts on China’s domestic environmental governance through the use of environmental public interest litigation (EPIL) are all but unrepresented within this coalition. Instead, eNGOs shaping industry standards like climate disclosures and novel ideas such as energy grid interconnectedness are represented in the BRIGC. This paper builds upon existing constructivist literature regarding China and the BRIGC’s norm localization and subsidiarization to understand the forces that compel Chinese eNGOs influence governance in primarily domestic or international realms created by political leadership. Using People’s Court Case Database EPIL case rulings and BRIGC reports, it argues eNGOs with strong international norms crystallized into international law best leverage their experience and expertise in domestic realms while those with engaged with moderately strong or weak norms best influence governance in organizations like the BRIGC. Qualitative content analysis of norms mentioned in BRIGC reports and their strengths is conducted to support the claims of this paper.

Introduction

Since its inception in 2013, the Belt and Road Initiative (BRI) has been the focus of numerous articles and research publications. Given the scope and scale of the BRI and its facilitation of carbon-intensive projects such as coal power plants, concerns and critiques of the

BRI's environmental impacts have been raised. Addressing these critiques, China has stressed green development within the BRI and has begun promoting a new, 'green BRI' that seeks to address many of these concerns (Su & Yu 2022). However, BRI research has underscored high-level, 'political aims' of the BRI, paying far less attention to the discrete political processes and the actors shaping the dynamics of BRI environmental governance (Hu 2018, Jirous 2022).

Institutions such as the Belt and Road Green International Development Coalition (BRIGC) seek to govern the BRI's environmental governance by debuting new governance mechanisms such as the 'stoplight' system and project development standards that intend to localize environmental standards and norms for an audience of developing nations. An emergent body of literature concerning the BRIGC and the BRI's environmental governance has emerged since its introduction (Sun et. al 2023, Sun & Yu 2022, Sun 2023, Xia 2024). However, these articles lack specific attention to the structure and membership of the organization itself, focusing on the BRIGC's effects on environmental governance or the ways these organizations advance China's aspirations to influence global environmental governance. Given the significant role NGOs play in the adoption and localization of norms domestically and globally (Sikkink & Finnemore 1998), this paper attempts to understand the role of Chinese environmental NGOs (eNGOs) in the BRIGC, and how their representation sheds insight into China's efforts to influence global environmental governance.

As in many other countries, NGOs have played a significant role in China's adoption of international environmental norms domestically. The China Biodiversity Conservation and Green Development Foundation (CBCGDF), All-China Environmental Fund (ACEF), Friends of Nature (FoN) and others were founded in the 1980s and 1990s in order to promote species conservation efforts. These Chinese environmental NGOs (eNGOs) have served as observers of

hallmark international conventions and treaties like the Convention on the Biological Diversity (CBD), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and are active members of the international community. Their role in shaping Chinese domestic environmental governance was expanded in 2015, as new policies allowed NGOs demonstrating sufficient commitment to environmental protection to engage in environmental public interest litigation (EPIL).

eNGO led EPIL has had tangible benefits improving local and provincial environmental governance, with 72 EPIL cases being selected by the Supreme People's Court as relevant to legal precedent (PCCD 2024, Wang & You 2024). Despite the positive contributions these eNGOs have made to domestic environmental governance, many litigious eNGOs have contentious relationships with Chinese government organs. eNGOs engaged in EPIL have had their environmental commitment questioned by People's Court judges "significant political background" (CBCGDF 2024). Although an eNGO has never been permanently stripped of its ability to litigate, it is clear the Chinese government has cautiously expanded the affordances it provides eNGOs to influence environmental governance (Wang & Xia 2023).

What is less clear is such apprehensive relationships impact what eNGOs participate in BRI institutions like the BRIGC and the contributions they are able to make. Companies like Chinese Aluminum Group (Alamco) that have previously been sued by eNGOs in domestic EPIL cases are represented on the BRIGC's advisory board (Zhang 2017). Conversely, the All-China Environmental Foundation is the only eNGO BRIGC member that has filed an EPIL lawsuit, with membership dominated by NGOs connected to green finance and industrial project development and financial regulators like the China Industrial Bank (BRIGC 2020).

This paper seeks to contribute to understandings of China's engagement with environmental norms by theorizing why eNGOs advancing domestic environmental governance lack significant representation in shaping the BRI's engagement with international environmental governance. This paper hypothesizes eNGOs with experience tied to norms crystallized into international rules like the CBD or CITES most effectively utilize their available pathways for influence in legal realms while those engaging with moderately strong or emerging norms best utilize their influence in international organizations like the BRIGC (Bloomfield 2016). Additionally, political leadership values normative actors seeking to uphold the status quo in the context of EPIL whereas actors more willing to engage in norm entrepreneurship are valued in the BRIGC (Bernstein 2012). To qualify these arguments, analysis of BRIGC reports and how choices to "follow international norms or introduce new ones" respectively prioritize and minimize the expertise of eNGOs engaged with weaker or stronger norms (Sun et. al 2023).

This paper will first establish definitions for relevant constructivist concepts such as norm localization, norm subsidiarity, the norm dynamic role spectrum, and pathways of influence available to actors engage in environmental governance. A literature review covering the development of Chinese eNGO involvement in environmental governance, eNGO-led EPIL cases referencing international norms, and articles discussing the BRIGC will be provided. A framework for conceptualizing norm strength along dimensions of institutionalization and congruence will be provided, followed by qualitative content analysis of norms referenced in BRIGC reports, the strengths of the norms referenced, and the context they are used in. Limitations of these findings, their implications, and directions for future research will be subsequently discussed.

Background & Definitions

valuable to local audiences. If these efforts are not resisted, it is localized through the redefinition of the norm to local contexts, the selection of aspects that resonate with the existing normative structure, and rejection of elements that do not resonate (Acharya 2004).

Norm subsidiarity presents a similar but distinguished interaction between local actors and external norms. Local actors are able to act as both norm makers and norm takers in subsidiarity as shown in Figure 2. Knowledge is used in the reconstruction of external norms carried out by local actors, who create subsidiary norms that either challenge positions held by powerful actors or support existing transnational norms (Sun & Yu 2023). Instead of a focus on local contexts, norm subsidiarity maintains a focus on relations between local actors and external actors “in terms of the former’s fear of domination by the latter” (Acharya 2011 p. 98).

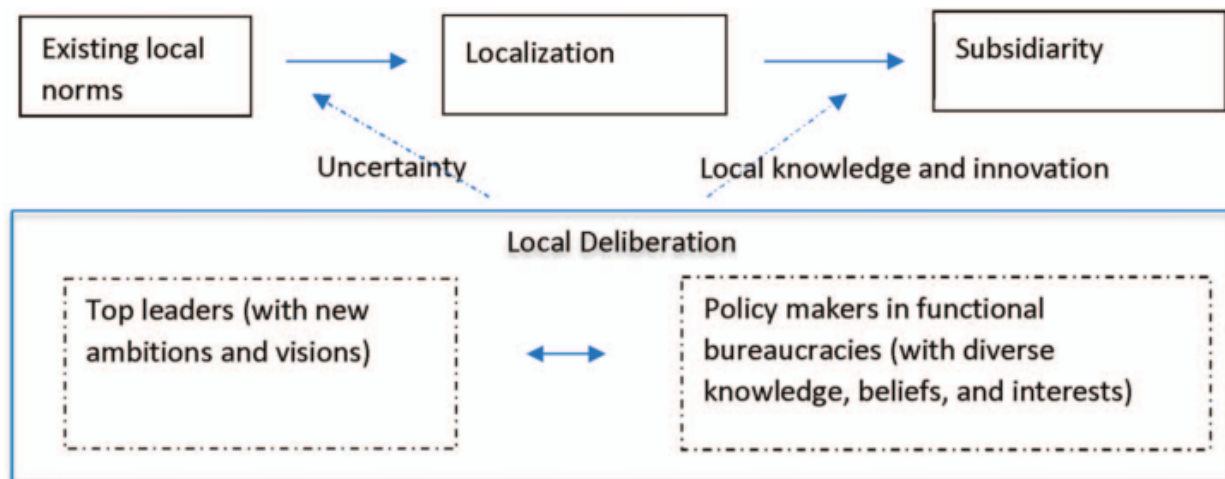


Figure 3. Local deliberation’s effect on norm dynamics (Sun & Yu 2023)

Applying these ideas to the Chinese context of the BRI’s environmental governance, Sun & Yu (2022) norms can be subdivided into categories of general goals, procedural norms, and operational norms (Yu 2019). This subdivision allows actors to “adopt only general ideas about an issue (e.g., environmental stewardship for overseas activities)” and simultaneously localize

operational norms or create subsidiary operational norms (Sun & Yu 2022 p. 95). Local deliberation amongst China's policy community (shown in Figure 3) results in choices to adopt, localize or create new subsidiary norm from an existing norm. In this community, top CCP leaders from the General Secretary or Politburo Standing Committee (PSC) outline broad policy agendas before bureaucracies like the Ministry of Environment and Ecology (MEE) or Ministry of Commerce (MOFCOM) then create procedural norms and governance frameworks in service of these goals and collaborate with financial regulators such as the People's Bank of China (PBoC), industry associations, and actors from countries hosting BRI projects. Within this framework, top leaders are able to encourage transnational learning and norm innovation through their agenda-setting power (Hu 2019, Sun & Yu 2022). Local actors embody the prerequisite novel ideas and local experience for norm subsidiarity processes (Schmidt 2014) and local actors promoting candidate ideas sell "specific interpretations of events" to policymakers or bureaucracies that influence operational norms (Yu 2021, 2022). For example, local actors' experiences regarding domestic international development cooperation can inform the development project standards (Chen 2020).

Although Sun & Yu (2023) provides a useful framework for understanding the BRI's environmental norm dynamics, nonstate actors like eNGOs, their involvement in these norm dynamics, and what types of nonstate actors are included in China's BRI "policy circle" remains underexplored. The authors note that nonstate actors do exert influence, "but their influence should be conditioned by the political space defined by top leaders and their engagement with relevant government agencies" (Sun & Yu 2022 p. 96). Aforementioned litigious eNGOs have little to no first hand experiences of development project implementation, the primary objective of institutions like the BRIGC. Despite this, many have extensive local experience regarding

biodiversity sustainability, one of the primary criticisms that has been levied against BRI projects (Lechner 2018).

Many eNGOs serving as BRIGC members, partners, or advisory committee members have local experience related to project development, green finance, or other areas the BRIGC concerns itself with. Such differences in expertise and knowledge may be a factor in the political spaces an eNGO engages with and may shape the roles an eNGOs can take on. For example, eNGOs embedded within the normative status quo due to their status as an observer of international treaties or laws may be constrained in their ability to act as norm entrepreneurs, thus their engagement in norm dynamics may be focused on primarily matters such as China's domestic adherence to international rules. eNGOs less embedded within the normative status quo may be attracted to join coalitions such as the BRIGC and engage in norm entrepreneurship by using their local experience to introduce a 'Chinese way' of project development or standardizing environmental disclosures. The concept of political spaces Chinese eNGO actors are afforded will be of primary focus in this paper and explored further in its literature review.

Norm Entrepreneurship and Antipreneurship

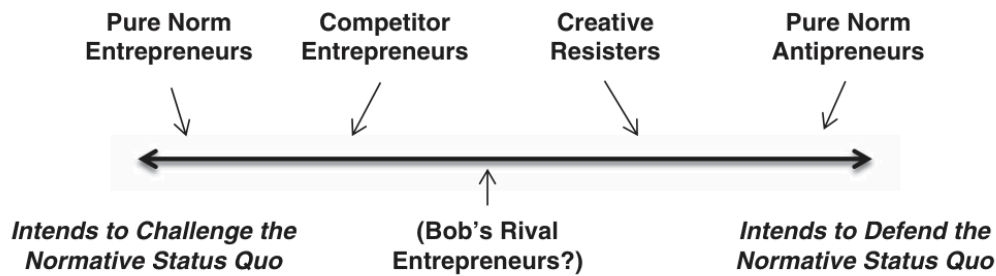


Figure 3. The norm dynamics role spectrum (Bloomfield 2016)

Norm localization, subsidiarity, and the diffusion of their outputs is often described as an effort undertaken by ‘norm entrepreneurs’ (Finnemore & Sikkink 1998). However, a singular label of entrepreneur neglects the possibility of actors to act as *antipreneurs*, or actors who seek to maintain the status quo and oppose entrepreneurial actors seeking to change it. Expanding on the antipreneur concept, Bloomfield (2016) proposes a ‘norm dynamic’ role spectrum (Figure 3) in which actors can take on varied roles that fall between ‘pure changers’ (or pure entrepreneurs) and ‘implacable resisters’ (or pure antipreneurs). ‘Creative resisters’ appear in Acharya’s model of subsidiarity as actors who seek to reject norms held by powerful states and opt for the reconstruction of these norms; ‘competitor entrepreneurs’ are actors who “agree on the need for change but differ on the exact scope and content of the new norm” (Bloomfield 2016 p. 330). Drawing the lines between entrepreneurship and antipreneurship becomes clear when a norm is sufficiently entrenched or institutionalized within the normative status quo, and entrenchment of a norm provides particular advantages for antipreneurs seeking to defend the entrenched normative status quo. A norm’s entrenchment allows for the refutation of entrepreneurial actors’ claims on grounds of their realization creating problematic outcomes. If these antipreneurial

claims fail and the status quo fails, antipreneurs are still able to undermine the new norm by seizing opportunities to pick holes in new norms and claim entrepreneurs as being idealistic, which may hinder the establishment of emergent norms (Bloomfield 2016).

It should also be noted that actors are able to transition between roles on this norm dynamic spectrum given circumstances. The 2008 Global Financial Crisis gave significant opportunity for pro-regulation actors to advance their claims and discredit pro-free market actors, resulting in some pro-market actors becoming creative resisters that conceded the need for some level of regulation (Bloomfield 2016). It is important to consider the range of roles eNGOs embedded or relatively disconnected from the normative status quo may plausibly inhabit. For example, eNGOs embedded in the status quo are less likely to support or promote pure norm entrepreneurship efforts that seek to significantly displace or reconstruct the status quo norms that have been codified into international rules, such as the Convention on Biological Diversity (CBD). Similarly, these same eNGOs are less likely to act as ‘creative resisters’, or normative actors that seek to reconstruct status quo norms, if they serve as observers of international rules and are compelled to take action against violations of said international rules (Bloomfield 2016). Conversely, actors that are less embodied in the normative status quo and do not have obligations to ‘call out’ instances of norm transgression may take on a wider range of roles in the norm dynamic spectrum. For organizations like the BRIGC seeking to promote a Chinese model of green project development and standards, organizations with weaker status quo ties may be more flexible and thus be more useful for its norm entrepreneurship goals.

Although it is unlikely the BRIGC will promote a drastic reinterpretation of international rules of environmental protection and conservation, including eNGOs ‘entrenched’ in the status quo in BRIGC policymaking processes offers potential benefits and drawbacks (Yu 2019). On

one hand, allowing such eNGOs access to BRI policymaking processes may prevent inadequate species and environmental conservation efforts from being implemented in BRI project standards. Their involvement may also signal the BRI's commitment to certain general goals of the normative status quo while simultaneously promoting reconstructed operational and procedural norms. On the other hand, allowing 'embedded' eNGOs like the CBCGDF access to BRIGC policymaking processes may hamper the extent to which the BRIGC can reconstruct status quo norm norms. The CBCGDF's history of filing EPIL suits against industry representatives in the BRIGC demonstrates a level of commitment to taking action against norm transgressors (Zhang 2017). It might take issue with BRIGC subsidiary or localized norms it deems a significant transgression other members do not, introducing possibilities for internal friction. Additionally, if eNGOs that uphold the status quo are merely figureheads and fail to prevent inadequate conservation provisions from being implemented, their commitment to such the normative status quo may be put into question.

Conversely, eNGOs not as embedded in the normative status quo like the Institute of Finance and Sustainability (IFS) or the Global Energy Interconnection Development and Cooperation Organization (GEIDCO) deal with norms yet to be codified into international law like environmental disclosures or transnational energy grid connectedness. These eNGOs also have relevant local experience related to project development eNGOs like the CBCGDF do not, allowing for greater collaboration with relevant industries like shipping or construction. At the same time, these eNGOs may be less successful in signaling China's commitment to aspects of the status quo and lack the direct knowledge of environmental conservation needed to recognize inadequate protective measures. Thus, political leaders steering the BRIGC's norm entrepreneurship must determine the extent to which they value local experience held by

organizations likely to act as antipreneurs (like the CBCGDF) or entrepreneurs (like the GEIDCO). By examining the makeup of the BRIGC's membership and the norms BRIGC reports reference, this paper believes the value leaders place on each type of actor can be inferred.

Pathways of Influence

Given China's empowerment and resistance to different aspects of the normative status quo, there is ample reasoning for China to empower both eNGOs strongly tied to and relatively disconnected from the normative status quo in the BRI's approach to norm entrepreneurship. Weiss & Wallace (2021) identifies China's willingness to align with the international order on certain norms that do not conflict with domestic interests. Cheng & Zhang (2021) presents an instance of international actors influencing domestic policy in spite of national interest, as the Climate Bond Institute's criticisms of Chinese green finance led to 'clean coal' projects being deemed as ineligible for green loans nationwide despite several provincial governments relying on coal plant revenues. With this in mind, a central puzzle of this paper is to understand how top leadership's choices to resist and support aspects of the normative status quo may be mirrored in eNGO choices to participate or not participate in political spaces like the BRIGC. Norm dynamic roles may be one consideration influencing eNGO decisions to join the BRIGC, but the need for eNGOs to most effectively utilize the pathways of influence available to them in the political spaces created by leaders presents another consideration.

Bernstein (2012) presents four pathways global influences can enact domestic and firm level policy change relevant to this puzzle. These pathways consist of international rules, international norms and discourse, markets, and direct access to policy-making processes.

International rules are articulated as “international agreements influence domestic policy to the extent that they create binding obligation on states through international law” and “transnational and/or domestic coalitions for change can activate rules in cases of non compliance” (Bernstein 2012). International norms and discourse “influence the direction of policy change when governments or firms face external pressures to change policies” and “success depends on resonance with domestic ideology, culture and broader policy goals, not on targeting particular actors or domestic policy networks”. Regarding markets, “use of market mechanisms is more likely to produce policy change when combined with elements of other pathways, especially when institutions are able to generate their own legitimate authority”. Xia (2024) underscores engagements with industry stakeholders as a popular way for Chinese eNGOs to influence governance. Lastly, direct access to policy processes “can result from international efforts to build learning fora and training about how to produce improved environmental, social and economic performance ‘on the ground’” (Bernstein 2012). In this case, involvement in the creation of the BRIGC’s project development standards and the ability to litigate EPIL cases may be considered access to policy processes.

Actor efforts to influence policies are strengthened by access to multiple pathways in this framework (Bernstein 2012). In the case of China’s environmental governance, all eNGOs are able to draw influence from international norms and discourse, but the remaining three pathways differ across eNGOs entrenched in the status quo and those not entrenched. eNGOs like the CBCGDF are able to draw upon international rules to exert influence using their status as observers of environmental treaties like the CBD and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). These eNGOs use their observer status to call out instances of norm transgression and strengthen their arguments in EPIL cases. However,

they draw little to no influence from pathways like markets, affording them two pathways to influence policies and governance related to norms outside of EPIL cases. eNGOs like the IFS or GEIDCO can more readily leverage market pathways because of their engagement with financial regulators that establish environmental disclosure requirements and promotion of environmental accounting standards. However, these standards are not embedded in international treaties with binding obligations, affording them two pathways of influence outside of the BRIGC.

The final pathway of influence - direct access to policy processes - is the pathway the central leadership has the greatest control over. Litigious eNGOs are able to influence policy by successfully litigating EPIL cases and BRIGC member eNGOs influence policy through their participation in delineating the BRIGC's project standards and reports. By engaging with political spaces created by high-level political leaders, eNGOs are allowed access to a third path to influence China's governance of normative issues. All spaces are not created equally, though. As discussed in this paper's literature review, EPIL cases are costly for Chinese eNGOs regardless of the ruling whereas BRIGC participation carries far lower costs. For litigious eNGOs, BRIGC presents a low-cost and consistent way to shape China's environmental governance, yet only one eNGO engaged in EPIL is represented in its membership. This paper hypothesizes Chinese eNGOs strategically choose to engage with political spaces where their pathways of influence can be coordinated and utilized to the greatest extent. For example, international rules like the CBD or CITES are ratified into Chinese law, meaning international rules are empowered as a pathway for influence in the context of EPI. Similarly, industry-oriented eNGOs effectively deploy market connections and industry experiences to introduce a 'Chinese way' of green project development in the BRIGC. The local experiences of different eNGOs determines the pathways of influence they can draw upon. As a result, eNGOs

gravitate towards political spaces enabling the greatest utilization of these pathways even if participation in other spaces is less costly.

Literature Review

This paper previously discussed core concepts and ideas relevant to this paper's arguments. What follows is a literature review encompassing articles on eNGO-led EPIL in China and an exploration of EPIL cases deemed by the Supreme People's Court (SPC) as particularly relevant to legal precedent followed by an overview of articles regarding the BRIGC and other developments in the BRI's environmental governance.

Public Interest Litigation, Domestic Governance, & Chinese NGOs as Norm Localizers

China has increasingly afforded judicial institutions greater authority through the adoption of EPIL after a series of reforms allowed NGOs to launch lawsuits against private and public parties. Reforms made to the Environmental Protection Law in 2014 gave "NGOs that meet certain qualifications" the standing to sue private parties for pollutive or environmentally destructive acts (Xiao & Ding 2023). However, such requirements have previously led to questioning of eNGO qualifications by courts. For example, CBCGDF's commitment to environmental protection was scrutinized in response to a 2015 EPIL suit (Wang & Xia 2023). Ambiguous qualifications, high costs of litigation, and other inhibitory factors influence how eNGOs utilize legal norms to regulate government behavior by way of legal mobilization (Xiao & Ding 2023). The norms drawn upon by eNGOs include canonized international norms like the Convention on Biological Diversity (CBD), leading to interpretations of these norms in rulings.

In spite of these aforementioned restrictions, it is undeniable that enabling eNGOs to launch EPIL suits has elevated their status from peripheral to vital actors in maintaining China's

regulatory stringency (Chu 2023). EPIL suits launched by eNGOS have led to real effects on the behavior of local governments in China, such as governments side with polluters less often and local officials more strictly enforcing environmental laws (Wang & You 2024). eNGOs like the CBCGDF, Friends of Nature (FON), and All-China Environmental Foundation (ACEF) have emerged as EPIL leaders, with the CBCGDF alone launching 50% of China's EPIL cases (Wang et. al 2023).

Given the relevance of eNGOs domestically, the restrictions presented by the domestic legal environment, and their active engagement in international civil society, BRIGC membership appears to be a stable opportunity for these eNGOs to positively impact Chinese environmental governance on the international stage. Since BRI projects are partnerships between Chinese and BRI member actors, environmental degradation caused by Chinese private industry in international BRI projects may spur domestic EPIL litigation. The CBCGDF has previously filed suits against international firms such as CNOOC, a shipping company prominent in the BRI, and China Aluminum Group (Alamco), represented by Yu Dehui in the BRIGC's Advisory Committee (Zhang 2017, BRIGC 2020). Greater representation of litigious eNGOs may bolster the preventative capabilities of BRIGC project guidelines, but their attachment to the normative status quo may hinder collaboration with these norm violators. In order to understand the norm dynamics of eNGO EPIL suits, an exploration of eNGO-led EPIL rulings referencing international norms that have been highlighted as particularly important by the Chinese legal system.

International Norms Present in People's Court EPIL Rulings

Some case rulings become designated as 'reference' or 'guiding' rulings by the Supreme People's Court (SPC) and compiled into the People's Court Case Database (PCCD). People's Court judges must reference rulings in these databases similar to cases they are judging before delivering a ruling, effectively solidifying these interpretations in legal precedent (PCCD 2024). 72 EPIL cases have been collected in the PCCD, with 19 designated as guiding cases and 53 designated as reference cases. Of the 53 reference cases, those that are not litigated by a government procuratorate and by social organizations are not referred to by their name but as "an environmental research institute" or "an environmental federation". None of the reference cases contain mentions of international environmental norms. Of the 19 guiding cases, 7 of them have been litigated by 4 Chinese eNGOs (CBCGDF, FoN, ACEF, Chongqing Green Volunteer Federation). These cases are No. 174, No. 173, No. 134, No. 132, No. 131, and No. 130. Of these cases, two of them (No. 174 and No. 75) make reference to the Convention on Biological Diversity (CBD) and both were cases filed by the CBCGDF. Cases No. 173 and No. 174 make mention of the International Union for the Conservation of Nature (IUCN) but the former does not explicitly reference any international rules or laws. Other cases make reference to national laws regarding environmental standards and regulations but do not reference international treaties, conventions, or other codifications of international norms.

Guiding case No. 174 was filed by the CBCGDF against the Yalong River Basin Hydropower Development Company over the threat the construction of its Yagen cascade power station posed to the *Acer pentaphyllum*, an endangered species of plant (SPC 2020). When the case was initially accepted in 2015, the endangered plant was not listed as part of China's national list of endangered flora & fauna but was included in a list of endangered species

published by the CBCGDF. The PCCD entry for this case makes note of the species appearing on the IUCN's Red List of Threatened Species. In 2020, Yalong Hydropower was ordered to conduct an environmental impact assessment of their project and ensure the construction of the power station would not further endanger the *Acer pentaphyllum*. Additionally, the ruling referenced China's ratification of CBD and the convention's provision that states must protect their own biodiversity and environmental impact assessment should be conducted for projects posing harm to species biodiversity to minimize such harm. However, the ruling also invokes the CBD's recognition of poverty eradication as the primary concern for developing countries to assert hydropower development as a critical resource needed to achieve such a goal given China's national conditions (PCCD 2024).

Guiding case No. 173 was filed by the Friends of Nature (FoN) in 2017 against Hydropower Engineering Consulting Group over a proposed hydropower plant in Kunming due to the threat it posed to endangered green peacock and cycad species (PCCD 2024). The PCCD entry for this case makes reference to the IUCN's Red List of Endangered Species to justify necessary measures taken to conserve cycad populations inhabiting the project site. The ruling delivered in 2020 forced Hydropower Engineering Consulting Group to immediately halt construction and conduct a new environmental impact assessment (Walker 2018).

Guiding case No. 75 was filed by the CBCGDF against the Ruitai Technology Company, in 2015, the year eNGOs were legally allowed to file EPIL cases. Interestingly, case No. 75 primarily concerns the CBCGDF's status as an NGO fit to engage in EPIL rather than an instance of pollution or species endangerment. The CBCGDF alleged that the Ruitai Company illegally dumped wastewater, creating serious pollution in the Tengri Desert that was not adequately addressed. However, the Intermediate People's Court of Zhongwei City issued a

ruling in 2015 that the CBCGDF did not meet the requirements stipulated by the environmental protection law enabling eNGOs to litigate EPIL suits. The CBCGDF appealed this ruling and had their appeal dismissed before appealing to the Supreme People's Court. The People's Supreme Court ultimately ruled in favor of the CBCGDF, citing its embodiment of the CBD's principles in ways aligned with the state's concept of "green development" as proof of its qualification to file EPIL suits.

The lack of reference to international norms within PCCD rulings is not surprising. The PCCD's intended audience are People's Court judges whose expertise and professional domain rarely if ever extends beyond domestic laws or issues. However, instances in which their rulings do make reference to international norms and the treaties codifying present exceptional instances in which the topics they engage with extend beyond domestic matters and intersect with international ones. Furthermore, the Supreme People's Court's decision to include these two cases referencing the same international treaty implies such interpretations of the CBD are especially relevant and are reflective of how the Supreme People's Courts interprets the CBD within the Chinese context.

What is notable is how these cases offer insight into how the CBCGDF and FoN leverage their access to pathways of influence (international rules and international norm discourse) and take on antipreneur roles upholding the normative status quo. In each case, an international rule or norm is invoked to either legitimize an eNGOs qualification to sue defendants for environmental damages. The rulings of cases No. 174 and No. 173 interpret the CBD and make reference to the IUCN Red List in order to mandate stringent biodiversity impacts for industrial projects, demonstrating how international rules and norms are utilized as pathways of influence in China's court system. Case No. 75 shows how the CBCGDF legitimized its observance of the

CBD to litigate EPIL lawsuits, demonstrating an instance of an eNGO leveraging its antipreneurial support of the status quo to qualify itself. Only in courts are eNGOs able to exercise their pathways of influence and embeddedness in the status quo in ways they are unable to in other political spaces.

BRIGC, Norm Localization, & Norm Subsidiarity

The BRIGC was established in 2019 and is composed of 130 member countries alongside various NGOs, think tanks, universities, and private industry representatives based in China and member countries, enabling robust cross-sector cooperation needed to coordinate the BRI's green transition. A list of the BRIGC's partner organizations is provided in the Appendix. Its stated purpose is "to promote international consensus understanding, cooperation, and concerted actions to achieve green development of BRI, to integrate sustainable development into the BRI through joint efforts, and to facilitate BRI participating countries to implement strong integration of environment and development elements of the SDGs" (BRIGC 2020). These aims are reflected in its Green Development Guidance for BRI Projects Reports, which detail progress BRIGC members have made toward establishing development guidelines for BRI projects and development projects solely undertaken by member countries.

Several articles have created frameworks to understand the role of non-state actors in driving this 'greening' of the BRI, such as facilitating China's increased engagement with international development standards and stakeholders (Liu & Barnett 2023). Other articles have examined the various strategic roles that eNGOs currently play within state-led initiatives, such as their ability to engage in civil diplomacy and development partnerships (Xia 2023). Orchestration theory has been applied to illustrate the causal pathways between subnational

actors in the BRIGC and their causal impact on China's environmental governance along the BRI (Geng & Lo 2023). Of particular interest for this proposal are articles describing the BRIGC's role as a norm localizer, aiding the creation of new global governance models by facilitating the localization of international norms and creation of subsidiary norms. This localization is driven by the situations of BRI member nations through deliberation and dialogue conducted within the BRIGC (Sun et. al 2023).

Although this literature regarding the BRIGC cuts against claims of China's international engagements being primarily influenced by domestic concerns (Weiss & Wallace 2021) or performance legitimacy needs (Teng & Wang 2021), previous literature on China's multi-level governance approach to environmental governance presents insights into how eNGOs act as normative actors across international and domestic political spaces (Cheng & Zhang 2023). Additionally, little attention has been paid to the types of eNGOs engaged with the BRIGC nor its lack of representation of influential domestic eNGOs such as the CBCGDF. Given the strong body of literature on the regulation of eNGOs and their ability to influence environmental regulation through EPIL as discussed below, this proposal intends to explore how the BRIGC interfaces with China's MLG approach to environmental governance and examine the differentiated roles eNGOs take across different levels.

Given the extensive scope of the Belt and Road Initiative and the pluralism of its actors, this proposal believes contributions to Green BRI research can best be done through examination of specific types of organizations - like eNGOs - and their interactions within state-led initiatives - like the BRIGC. This proposal adopts a definition of the BRI as a high-level strategy that places China at the center of various separate 'concentric circles' of actors, industry stakeholders, and initiatives related to the BRI. As a norm localizer, the BRIGC touches upon many of such

‘circles’ relevant to the BRI’s green transition and acts as a flagship hub for input from stakeholders driving the BRI’s green transition. At the same time, eNGOs have become prominent actors within China’s approach to environmental governance as evidenced by their increased engagement with EPIL. Literature articulating the palpable restrictions on eNGOs’ legal mobilization and emphasis on the influence of nonstate actors in international spheres would imply a greater litigious eNGO presence in the BRIGC that has yet to be seen.

Argumentation

This paper builds upon the framework of local deliberation put forth by Sun & Yu (2023), where local deliberation serves as a catalyst for norm localization or norm subsidiarity contingent on certain factors. The framework, primarily concerned with Chinese bureaucratic institutions and strategy put forth by top-level leadership, leaves room for further exploration of how Chinese actors choose to either engage in norm localization or norm subsidiarity. Focusing on domestic eNGOs as nonstate actors, this article argues eNGOs are attracted to different political spaces according to the pathways of influence they are able to access and the ranges of norm dynamics roles valued by political spaces.

eNGOs like the CBCGDF, FoN, GEIDCO, ACEF, and IFS, each hold local experiences regarding procedural, operational, and general policy goal norms of biodiversity conservation. The BRIGC values such expertise and has not only included biodiversity measures into its project development guidance reports but has published reports exclusively covering biodiversity conservation topics as well (BRIGC 2020, 2021). However, the types of organizations holding BRIGC membership have local experience stronger ties to project development and procedural norms like climate finance or novel issues such as global energy grids. With the exception of the

ACEF, Chinese eNGO members of the BRIGC have weaker links to the normative status quo and have previously engaged in EPIL. Conversely, only eNGOs with strong ties to the normative status quo file EPIL lawsuits since they can leverage international rules. Across these international and domestic political spaces afforded to Chinese eNGOs, the represented eNGOs engage with stronger and weaker norms, respectively. Engagement with different strengths of norms allows for different pathways of influence to be leveraged and different pathways are valued more or less across different political spaces.

This paper argues that Chinese eNGOs possessing local experience related to norms crystallized as international rules most effectively leverage this experience through EPIL since international rules are some of the only norms China has explicitly ratified into law. Applying the Sun & Yu (2023) framework, uncertainty regarding existing local environmental governance norms highlighted by EPIL resulted in greater emphasis on environmental impact assessments in project development. Although courts allow for international rules to be leveraged most effectively, the process of local deliberation allows for top political officials to have the final say in official interpretations of norms in a given political space. For example, guiding case No. 174 interprets China's adherence to the CBD in a way allowing China to sacrifice conservation measures for "poverty elimination" and reflects the Supreme People's Court's (SPC) current opinions (PCCD 2024). Although the case ruled in favor of the CBCGDF and set a legal precedent for norms of industrial projects conducting environmental impact assessments, this official interpretation provides ambiguity affording flexibility for judges to permit biodiversity degradation in the name of poverty relief.

The antipreneurial norm dynamic roles these embedded eNGOs take on are also valued within this domestic political space. Case No. 75 cites the CBCGDF's observance and promotion

of the CBD as sufficient qualification for it to pursue EPIL cases (PCCD 2024). Not only are eNGOs attracted to political spaces best suited to their normative pathways of influence, top leaders value the antipreneurial roles litigious eNGOs inhabit. Furthermore, the SPC allows eNGO-led EPIL case outcomes to set operational and procedural norms within the domestic sphere but maintains the power to interpret China's policy goals vis-a-vis environmental norms.

Similarly, industry-oriented eNGOs best leverage their local experience by cooperating with industry stakeholders and international eNGOs. Their relative detachment to international rules enables these eNGOs to work with international rule transgressors such as China Aluminum Group and the BRIGC allows member eNGOs to best utilize international norm discourse and market-oriented pathways of influence (BRIGC 2020). Additionally, these eNGOs can take on a wider range of norm dynamic roles given their involvement with weaker international norms yet to be codified into international rules, allowing them to best support the norm entrepreneurship goals set by political leaders. Accounting standards and principles like the TCFN or TCFD are the 'bread and butter' of these organizations, industry stakeholders, and financial institutions such as the PBoC. Regulators define compliance and noncompliance with these standards themselves but noncompliance does not trigger action from international or regional coalitions unlike international rules (Bernstein 2012). These standards are agreed upon by the international community and have seen adoption by financial regulators but are not entrenched in the normative status quo. Pathways of normative influence available to industry-focused eNGOs may attract them to join the BRIGC to most effectively use said pathways and political leaders encourage their participation since their engagement with weaker norms allows these eNGOs to inhabit norm dynamic roles that support the BRIGC's normative aims.

As discussed in the literature review, choosing to engage in EPIL can be a costly decision for eNGOs whereas the BRIGC membership appears to have relatively minimal costs. BRIGC membership may be an attractive prospect for more eNGOs embedded in the status quo and their greater participation may lead to the BRIGC more effectively addressing oft-held criticisms of BRI projects neglecting biodiversity concerns (Lechner 2018). Furthermore, embedded eNGOs could serve as a counterweight to the interests of industry members that have previously transgressed international environmental rules. By involving these litigious eNGOs in the BRIGC and its governance mechanisms, project standards may take on preventative qualities that are strengthened by the possibility of Chinese firms involved in BRI projects being sued by eNGOs in instances of noncompliance, incentivizing conservatory practices. The case for eNGOs embedded in the normative status quo to pursue BRIGC membership is reasonable and the BRIGC charter claims membership is open to any organization with demonstrable environmental commitment (BRIGC 2020). However, eNGOs engaging in EPIL merely serve as members of initiatives Belt and Road Life Science Economy Alliance that have had little if any outputs or influence (CBCGDF 2019).

Following this logic of nonstate actor influence being contingent upon political strategy and the influence of top leaders and bureaucracies, this paper believes litigious eNGOs constrain themselves to domestic political spaces and industry-oriented eNGOs for two reasons. First, literature on Chinese EPIL demonstrates a concerted effort to limit and contain the influence that eNGOs can exert through litigation. Allowing litigious eNGOs to influence the BRIGC's development of environmental governance mechanisms may work against the calculated management of these eNGOs' domestic influence by political leadership. Despite this shaky relationship, EPIL presents the most effective way for eNGOs embedded in the normative status

quo to exercise influence via international rules. Additionally, these eNGOs have heightened their public profiles because of litigation. When the CBCGDF was “wrongly fined” by the Ministry of Civil Affairs in August 2024, it published an article seeking support from legal professionals to challenge this penalty. Within five days, “dozens of legal scholars” volunteered to aid the CBCGDF’s case and voiced public support for the eNGO (CBCGDF 2024). Litigious eNGOs may forgo opportunities to influence the BRI’s environmental governance not because they are uninterested but to distinguish themselves as organizations fighting injustices.

Secondly, eNGOs are relegated by political leaders to shaping China’s reconstruction and localization of operational and procedural norms but not general policy goal norms, which fall within the purview of political leaders. As a result, eNGOs with local experience entwined with international rules play a minimized role in the BRIGC’s local deliberation processes influencing norm dynamics. International rules are invoked by several BRIGC reports but are merely used to signal China’s alignment with normative status quo definitions of biodiversity and species conservation defined by international rules like the CBD, rendering antipreneurial eNGOs and their local experience moot. Conversely, EPIL rulings leverage this same local experience and antipreneurial positions of eNGOs to establish operational norms like environmental impact assessments in legal precedent. Simply put, eNGOs influence norm dynamics in political spaces where their range of norm dynamic roles allows them to influence operational or procedural norms.

This paper’s argument is supported if norms referenced by BRIGC reports predominantly references operational and procedural norms that are weaker than international rules like the CBD. Additionally, instances in which international rules are referenced in BRIGC reporting are expected to inform the BRIGC’s general policy goals rather than its operational or procedural

guidelines; otherwise, local experiences of litigious eNGOs are expected to be valued more. What follows is a description of the qualitative content analysis (QCA) this paper has used to analyze norm references across 7 BRIGC reports providing guidance and standards for biodiversity conservation approaches for BRI projects.

Methodology

The previous argumentation and analysis is dependent on how ‘strong’ or ‘weak’ the norms each political space seeks to introduce new norms within. There is little consensus on how to measure such strength or how to classify a norm as ‘weak’ or ‘strong’ but several authors have proposed their own conceptualizations attempting to do so. This article employs Ben-Josef Hirsch and Dixon’s framework for conceptualizing a norm’s strength as “the extent of collective expectations related to a principled idea” measured by two indicators: the *concordance* and *institutionalization* of an idea.

By measuring a norm’s strength along two discrete attributes, weak norms with a high level of concordance and low institutionalization (e.g., gender equality norms) are able to be distinguished from weak norms with high levels of institutionalization and low concordance (e.g., anti-mercenary norm) (Ben-Josef Hirsch & Dixon 2020). These indicators have previously been used to gauge a norm’s strength over a period of time, but its authors note its applicability for comparing the strengths of closely related norms. Since operational and procedural norms (e.g., environmental accounting standards) and general norms (e.g., minimizing harm to biodiversity) are intertwined, this paper finds it appropriate to use this framework to determine the strengths of norms referenced in BRIGC reports

Table 1. Range of values for indicators of norm strength.

	Low ←	Moderate	→ High
Concordance	<ul style="list-style-type: none"> Few or sporadic references in IO and INGO reports and resolutions No or very low rhetorical support from relevant INGOs and IOs Violations not noted by IOs, INGOs, and states 	<ul style="list-style-type: none"> Regular, positive references in IO and INGO reports and resolutions Adoption and/or compliance rhetorically supported by some INGOs and IOs Violations inconsistently criticized by IOs, INGOs, and states 	<ul style="list-style-type: none"> Frequent, positive references in IO and INGO reports and resolutions Adoption and/or compliance strongly rhetorically supported by relevant INGOs and IOs Violations strongly criticized by IOs, INGOs, and states
Institutionalization	<ul style="list-style-type: none"> May be extrapolated from international law(s) IOs either do not or only sporadically promote adoption or monitor compliance 	<ul style="list-style-type: none"> May be affirmed and codified in international and/or regional court decisions May be codified in international law, but not yet widely ratified IOs formally promote adoption and implementation of idea 	<ul style="list-style-type: none"> Explicitly codified in international law and ratified by a majority of eligible states IOs formally promote adoption and implementation, monitor or evaluate compliance, and/or sanction violations

Figure 4. Indicators of Norm Strength (Ben-Josef Hirsch & Dixon 2020)

Concordance is defined as the ‘degree’ to which actors make reference to an idea as suitable or appropriate. Ben-Josef Hirsch & Dixon state concordance can be measured by analyzing the frequency of references to an idea by international organizations (IOs) or international NGOs in the ‘corpus of reports or resolutions’, assessments of the extent of NGO and IO support for adoption or compliance with an idea, and responses of INGOs and IOs to instances of noncompliance with a principled idea (Ben-Josef Hirsch & Dixon 2020). Low levels of concordance regarding a principle idea results in “few or sporadic references” in IO and INGO reports or resolutions. As a norm strengthens, its positive references to it in reporting and resolutions is expected to increase whereas a weakening norm will see an inverse decrease in positive references.

Institutionalization is defined as the degree an idea is codified in international law and can be assessed by the existence of an idea in international treaties or conventions and the

existence of organizations with aims of promoting the adoption or implementation of an idea. Codification of norms purely through judicial decisions is considered a weaker form of institutionalization compared to formal inclusion in international treaties like the CBD or CITES by this framework (Ben-Josef Hirsch & Dixon 2020). At lower institutionalization levels, an idea is unlikely to be referenced in international laws or be promoted by IOs. As an idea begins to become a norm, it may be affirmed in judicial decisions while IOs & INGOs begin promoting its adoption. The SPC guiding cases referencing the CBD can be interpreted as contributions to the CBD's institutionalization within China.

Returning to the concept of political spaces, this paper takes account of environmental conservation norms referenced in BRIGC reporting and categorizes the strength of these norms using aforementioned definitions of institutionalization and concordance. The frequency of international norms referenced across 7 BRIGC reports from 2020 to 2024 will be recorded. These reports include the BRIGC Green Development Guidance Baseline Report, two subsequent Green Development Guidance Reports (Phase II Part 1 and Phase III reports), the BRIGC Key Biodiversity Areas and Impact Assessment in BRI-covered Areas report, the BRI Case Studies Report on Biodiversity Conservation, the Accelerating Green BRI Investments report, and Handbook on BRI Stakeholder Engagement report. Each was selected due to their inclusion of guidelines for biodiversity conservation. Norms referenced across these reports will be categorized as international rules, strong norms, moderate norms, and weak norms according to their levels of congruence and institutionalization as shown in Figure 4. The total frequency of norms referenced across more than one report will be of particular importance since these norms are consistently included in BRIGC reporting and thus deemed important for informing BRI project development practices.

In both spaces, eNGOs are empowered and able to influence Chinese environmental governance. However, this paper hypothesizes the international norms referenced by BRIGC reporting will utilize weak to moderately strong norms to reconstruct new subsidiary or localized norms, undercutting the utility of the local experience held by litigious eNGOs in local deliberation processes. Furthermore, this paper hypothesizes references to international rules in BRIGC reports serve to define general policy goal norms rather than operational norms, further undercutting the possible contributions of litigious eNGOs to the BRIGC's norm entrepreneurship. What follows are explanations for the categorizations of norms frequently referenced by the aforementioned reports informed by definitions of localization and congruence, findings derived from QCA of the frequency of references across reports, and lastly a discussion of these findings.

Categorizations of Norms

International Rules

International rules are defined as international conventions and treaties that have been ratified by a majority of countries and codified into international law. These rules have observer organizations and ways for those who go against noncompliance to be held accountable. International rules are considered by this paper to be stronger than the three categories of norms discussed in this paper (strong, moderate, and weak norms).

Within the norms discussed in BRIGC reporting, CITES, CBD, and Convention on Migratory Species (CMS) are norms that can be defined as international rules. CITES Article VIII implores states that have ratified CITES to sufficiently criminalize and penalize trade of wildlife prohibited by CITES (CITES 2024). National Biodiversity Strategies and Action Plans

(NBSAPs) intended to demonstrate a state's plans or policies to implement biodiversity conservation practices in relevant sectors, Article 26's requirement for party states' mandate for national reports outlining measures taken by a state to properly implement the CBD, and the Voluntary Peer Review process in which groups of reviewers from different states review the implementation of another state's NBSAPs comprise several of the CBD's enforcement mechanisms (CBD 2024, CBD 2012). The CMS has a Review Mechanism that allows for parties of the Convention to review specific aspects of another party state's implementation of the CMS and its National Legislation Programme intends to provide support to party states in the creation or improvement of relevant national legislation (CMS 2025). The widespread ratification of each of these international treaties and the enforcement mechanisms within each of them qualify these norms as international rules.

Strong Norms

Strong norms are defined as norms that have seen widespread international acceptance from relevant stakeholders and acceptance from governments. International organizations frequently make positive mention of these norms when discussed. Amongst the norms discussed in BRIGC reporting, the Principles for Responsible Investment (PRI) and the Global Reporting Initiative (GRI) Standards are considered to be strong operational norms by this paper. Both outline relevant practices and procedures for reporting climate, environmental, and biodiversity impacts among other issue areas such as corruption. Despite their lack of nonvoluntary enforcement mechanisms or codification into international law, the PRI and GRI have seen prolific international use and adoption since their introductions in 2006 and 1997, respectively.

The PRI was founded in collaboration by then UN Secretary General Kofi Annan, 20 investors from 12 countries, and a group of 70 individuals representing civil society organizations. The PRI currently consists of 5,268 signatories collectively holding \$125 trillion USD in assets under management hailing from more than 80 countries, ranging from asset owners, investment managers, and service providers (UNPRI 2025). Signatories that fail to meet minimum reporting requirements are subsequently delisted. The UN Environmental Programme Finance Initiative (UNEP FI) and the UN Global Compact are significant international organizations that support the promotion and development of the PRI and hold seats on the PRI Board (UNPRI 2025). Since PRI standards are publicly available, organizations like the BRIGC and their members are encouraged to reference the PRI when delineating sustainable investment compliance standards even if they are not PRI signatories. The combination of high levels of adoption from stakeholders across a majority of countries confers a high level of institutionalization and congruence, designating PRI standards as a strong norm.

GRI Standards are used by more than 14,000 organizations across more than 100 countries and are considered to be the most widely used sustainability standards globally (KPMG 2024). Reporting using GRI Standards is voluntary but organizations are able to register their reporting with the GRI and receive reporting support from the GRI if needed. The GRI's Global Sustainability Standards Board (GSSB) is an independent standard-setting body that interprets and clarifies what each GRI Standard requires in an organization's reporting in order to be considered in compliance (GRI 2025). The GRI engages with UN agencies and national governments to promote national-level legislation that introduces stronger environmental and climate related reporting standards. Like the PRI, GRI Standards are voluntary but have seen significant international adoption by relevant stakeholders. High levels of adoption from relevant

stakeholders across a majority of countries and consistent support from international organizations confers high levels of congruence and moderate to high levels of institutionalization, designating the GRI as a strong norm.

Moderate Norms

Moderate norms are defined by this paper as operational norms that have seen significant adoption by relevant stakeholders internationally but to a lesser extent than those classified as strong norms. Additionally, moderate operational norms have less robust mechanisms for their adoption and enforcement or have received scrutiny from relevant organizations. Amongst norms discussed in BRIGC reporting this paper defines the following as moderate norms: International Finance Corporation Performance Standards (IFC PS), the European Union sustainable activity taxonomy (EU Taxonomy), Taskforce on Climate-related Financial Disclosures (TCFD), Equator Principles (EP), Global Biodiversity Information Facility (GBIF), World Bank Environmental and Social Standards (WB ESS), and European Investment Bank Environmental and Social Standards (EIB ESS).

The IFC PS, WB ESS, and EP are all closely intertwined. The EP standards, created in 2002, are intended to act as a baseline for assessing environmental and social risks associated with five financial products associated with industrial infrastructure and industrial projects. These products include project finance advisory services, project finance, project-related corporate loans, bridge loans, and project-related refinance (EP 2025). Over 130 financial institutes across 38 countries have registered as EP Financial Institutions (EPFIs) and are expected to implement EP standards into their practices. In 2006, the EP standards were revised to align with the IFC PS. Since the IFC is a member of the World Bank Group that engages with

private sector clients as opposed to the public sector audience of the World Bank, the WB ESS and IFC PS both seek to provide environmental and social impact assessment guidelines but are geared towards distinct audiences (World Bank 2025, IFC 2025).

Like other previously discussed compliance standards, EP standards, the IFC PS they are based off of, and WB ESS standards are voluntarily implemented by financial institutions outside of the World Bank Group and IFC. However, organizations like the Climate Advisor Ombudsman have reported the IFC PS do not sufficiently reduce GHG emissions created by private sector projects in their current form (CAO 2024). Similarly, the UN Guiding Principles on Business and Human Rights expressed that EP standards lack sufficient accountability (UNGP 2024). This paper associates negative references to the IFC PS and EP standards from international organizations such as the UNGP and the lack of extensive adoption of each set of standards by states but significant adoption of such standards by financial institutions with moderate congruence and moderate institutionalization, designating all three sets of standards as moderate norms.

The GBIF is an international organization created in 2001 for the purpose of creating an online database of scientific biodiversity data. 48 countries are represented as voting participants and 16 countries are represented as associate country participants, totaling 64 country participants (GBIF 2025). Participant countries designate a node organization responsible for managing data contributed to the database by 2,509 publisher organizations across the globe. Citizen scientists and NGOs like the CBCGDF have contributed much of the data included in the GBIF in the past decade (Heberling et. al 2021). In 2022, the EP organization began encouraging EPFIs to disclose biodiversity data related to infrastructure projects on the GBIF. However, disclosure of such data is merely encouraged by EP standards rather than a requirement for EP

compliance. Given the moderate adoption of the GBIF from countries and its high number of publisher organizations, this paper classifies the GBIF as having moderate to weak institutionalization and moderate to high congruence, designating it as a moderate norm.

The EU Taxonomy was introduced by the EU and classifies economic activities based on their alignment with the EU's goal of net zero emissions by 2050 as part of the European green deal (EU 2025). The taxonomy is used by financial institutions in order to determine what projects or investments are able to qualify for green loans or bonds. The EU Taxonomy is often used as a point of comparison for other green finance taxonomies such as China's Green Bond Endorsed Project Catalogue (CBI 2019). The Common Ground Taxonomy released by the International Platform on Sustainable Finance in 2021 draws upon both China's Green Bond Catalogue and EU Taxonomy in order to unify both sets of standards and be implemented by other countries (IPSF 2021). In 2022, the EIB revised its Environmental and Social Standards to align with the EU Taxonomy (EIB 2024). Although enforcement mechanisms exist for EU member states, the EU Taxonomy and EIB standards lack enforcement mechanisms outside the EU and are voluntarily implemented or referenced by relevant stakeholders. Additionally, these EU standards only cover a limited number of industries, limiting its ability to be adopted by a wide range of organizations and stakeholders (Pettingale et. al 2022). EIB ESS and EU Taxonomy are determined by this paper to have moderate congruence due to significant reference to these sets of standards outside of EU states and moderate to weak institutionalization due to a lack of enforcement mechanisms outside EU states. As such, EIB ESS and EU Taxonomy standards are classified as moderate norms.

TCFD reporting standards present an approach to environmental finance standards distinct from the EU Taxonomy. Created by the Financial Stability Board in 2015, TCFD

standards have been promoted and adopted by nearly 5,000 institutions across 103 countries. TCFD standards cover four thematic areas encompassing metrics and targets, risk management, strategy, and governance (TCFD 2025). Rather than classify economic activities, firms are able to disclose aspects of their operations' climate impacts and internal governance regarding climate issues as they choose. The TCFD was disbanded in 2023 after its work had been "completed", with the International Financial Reporting Standards Foundation (IFRS) taking the reins of the TCFD and incorporating TCFD standards into its IFRS Sustainability Disclosure Standards (IFRS 2023). TCFD/IFRS standards are voluntarily adopted by organizations, however financial regulators such as the Shanghai Stock Exchange, the U.S. SEC, and others have introduced mandatory TCFD-aligned disclosure requirements (UNEP 2025, EY 2024). Despite adoption from regulators and firms alike, both are inconsistent in what aspects of TCFD reporting standards are mandated or voluntarily disclosed. For example, in 2022, 58% of companies released disclosures in line with 5 of the TCFD's 11 recommended disclosures but only 4% of companies released disclosures in line with all 11 (FSB 2023). Discrepancies in how regulators and institutes implement TCFD/IFRS standards hinders its further adoption and strengthening as an international norm. Despite the lack of embedded enforcement mechanisms, the adoption of TCFD standards by regulatory bodies of states confers moderate institutionalization. High levels of adoption from relevant stakeholders with inconsistencies in what parts of TCFD standards firms choose to disclose confers moderate congruence, leading this paper to designate TCFD standards as a moderate norm.

Weak Norms

Weak norms are defined in this paper as emergent operational norms that have yet to see significant international adoption. Across BRIGC reports analyzed by this paper, it identifies

Key Biodiversity Areas (KBAs) and Taskforce on Nature-related Financial Disclosures as weak norms.

The Key Biodiversity Areas Partnership was established in 2016 by 13 organizations including BRIGC partner organizations like Conservation International, the WWF, Wildlife Conservation Society, and the IUCN. The KBA partnership intends to prevent the mass extinction of flora and fauna by mapping areas around the world where biodiversity conservation is considered critical using IUCN criteria such as its Red List of Threatened Species (KBA 2025). Areas that house a significant number of endangered species, contain species of taxonomic groups confined to limited geographic areas, are relatively untouched by human activity, are places animals congregate for the purposes of breeding or spawning, or are essential for countries to meet their biodiversity targets are eligible for KBA designation. KBA data and designations are intended to be utilized by financial institutions, governments, and civil society organizations to guide their approaches to biodiversity conservation and minimize the impact their activities have on biodiversity. Although the use of KBAs is completely voluntary and has yet to see any formal partnerships or implementations by states, the KBA Partnership posits KBAs as an important resource for countries to reach targets set by the Kunming-Montreal Global Biodiversity Framework, introduced by the CBD in 2022 (KBA 2023). Additionally, articles have criticized the lax criteria used by KBAs, arguing that up to 80% of Earth's surface could be considered part of a KBA using its current criteria (Farooq et. al 2023). The low level of engagement from relevant stakeholders with the KBA Partnership and a lack of significant promotion or institutionalization by international organizations leads this paper to label KBAs as a weak norm with weak congruence and weak institutionalization.

Proposed in 2020 and co-founded by the UNEP, the Taskforce on Nature-related Financial Disclosures is a set of voluntary disclosure recommendations similar to the TCFD/IFRS disclosure standards composed of the same thematic areas of governance, strategy, risk management and impact, and metrics and targets. Recommendations across these areas are in alignment with the CBD's Kunming-Montreal Global Biodiversity Framework (TNFD 2025). Like the TCFD, adopters are not required to disclose all of the TNFD's recommended disclosures. Over 500 organizations across 54 countries with a collective \$17.7 trillion USD in assets under management and 129 banks have already adopted TNFD disclosure standards (TNFD 2025). In October of 2024, 10 civil society networks representing 200 organizations filed a complaint regarding the TNFD through the UNEP's grievance mechanisms due to 45% of the Taskforce's members "facing serious environmental and human rights concerns (Forests and Finance 2024). A relatively low level of adoption from relevant stakeholders and palpable criticism of TNFD from relevant organizations confers weak institutionalization and weak congruence, leading this paper to label TNFD standards as a weak norm.

Findings

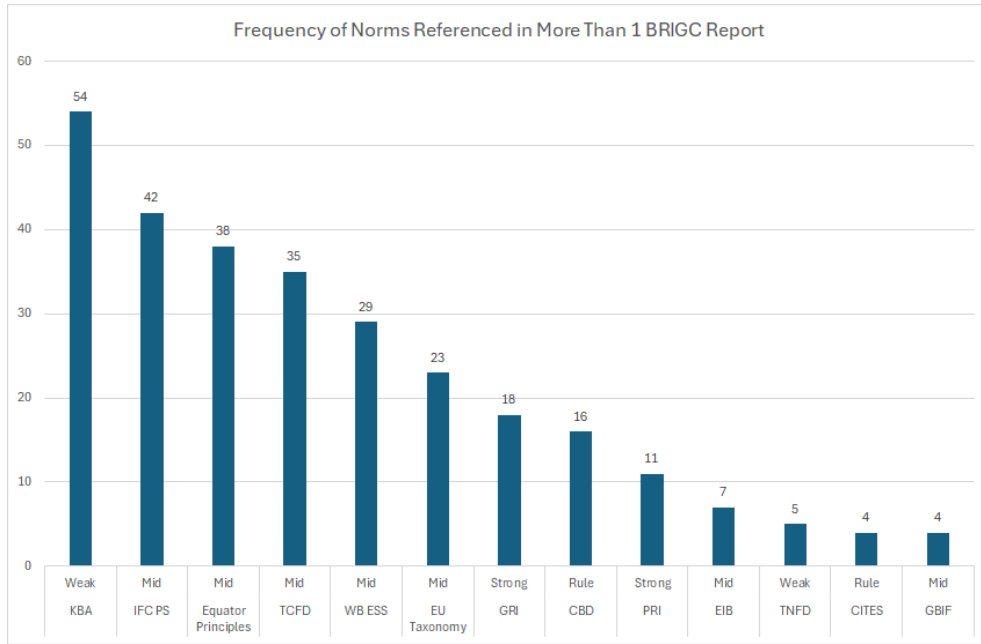


Figure 5. Total Frequency of References to Norms Mentioned in More Than 1 Report Across All Reports

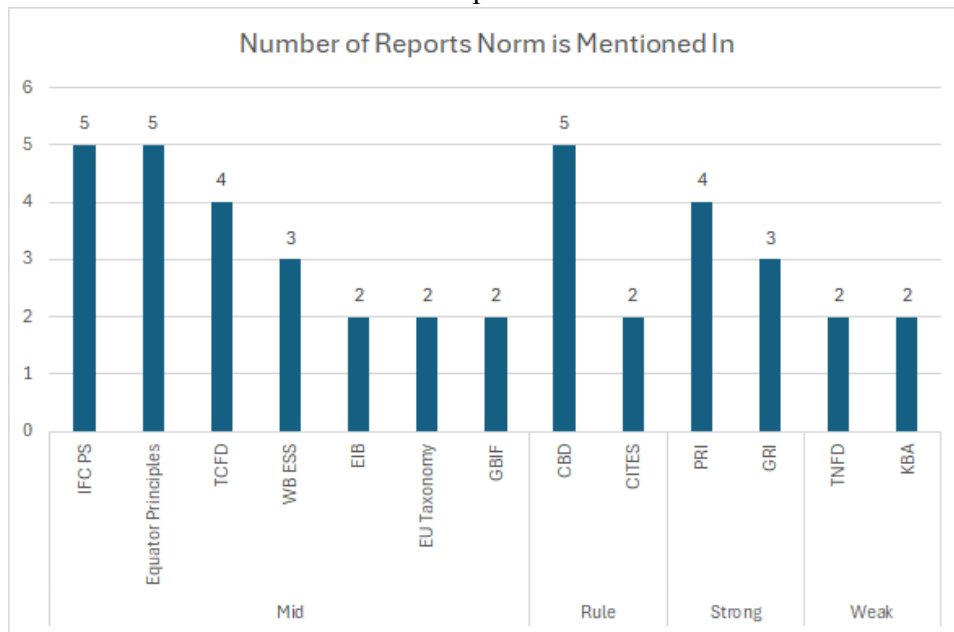


Figure 6. Total Number of Reports Each Norm is Mentioned In

Strength of Norm	Total References	No. of Norms	Average number of References per Norm
Weak	59	2	29.5
Moderate	178	7	25.4
Strong	29	2	14.5
Rule	20	2	10

Table 1. Total References, Number of Norms and Average Number of References per Norm Categorized by Strength of Norm

Name	Strength	# of Documents	Total Frequency	Average No. of References per Report
KBA	Weak	2	54	27
EU Taxonomy	Moderate	2	23	11.5
WB ESS	Moderate	3	29	9.67
TCFD	Moderate	4	35	8.75
IFC PS	Moderate	5	42	8.4
Equator Principles	Moderate	5	38	7.6
GRI	Strong	3	18	6
EIB	Moderate	2	7	3.5

CBD	Rule	5	16	3.2
PRI	Strong	4	11	2.75
TNFD	Weak	2	5	2.5
GBIF	Moderate	2	4	2
CITES	Rule	2	4	2

Table 2. Breakdown of Norms by Strength, Number of Documents with References, Total Frequency, and Average Number of References per Document

Moderate was abbreviated to “Mid” in bar charts for readability. Figure 5 shows the total number of references to a norm across all seven reports. Key Biodiversity Areas, IFC PS, and TCFD standards received the most total references while TNFD standards, CITES, and GBIF received the least total references. Figure 6 shows the number of reports each norm received at least one mention in. The IFC PS, Equator Principles, and CBD were mentioned in the greatest number of reports (5) followed by TCFD and PRI standards (4) while the remaining norms were mentioned in 2 reports. Breakdowns of norm reference by individual documents are provided in the Appendix.

Table 1 shows the average number of references and total number of references for norms of each strength. Moderate norms were referenced the most across the 7 reports, followed by weaker norms, strong norms, then rules. Moderate norms comprise the greatest number of norms referenced with 7 norms compared to the 2 norms assigned to other categories of normative strength. Weak norms have the greatest average number of references per norm, followed by moderate norms, strong norms, then international rules. Table 2 shows specific norms ranked by

the average number of references per document a norm appears in. A majority of weak norm references are attributed to one report with a specific focus on KBAs, the Key Biodiversity Area and Impact Assessment in BRI-covered Areas report, lending to its exceptionally high number of average references per norm. The EU Taxonomy, WB ESS, and TCFD standards trailed KBAs in the average number of references per report, while CITES, TNFD, and GRI were norms receiving the lowest average number of references.

Limitations

A more granular method of classifying these norms and their indicators of norm strength may yield more insight. However, since many of these norms are operational norms intended to voluntarily be implemented by financial institutions and firms, finer definitions for levels of institutionalization would need to be created. Similarly, finer definitions of congruence would rely on extensive analysis of reports published by a large sample size of organizations beyond the scope of this paper. For the aims of this paper, comparing the number of documents referencing moderate norms and average number of references per document among moderate norms is sufficient.

Discussion of Findings & Conclusion

The findings of this paper's QCA supports claims of the BRIGC primarily engaging with moderate to weaker norms with less reference to international rules or strong norms embedded in the status quo. As a result, pathways of influence available for litigious eNGOs embedded in the normative status quo are likely less relevant compared to pathways available to industry-oriented eNGOs. Additionally, the antipreneurial norm dynamic roles eNGOs can take on are deprioritized since international rules are not referenced in the operational norms of these

reports. What follows is an exploration of how international rules are utilized as general policy norms and moderate to weak norms inform the operational and procedural norms promoted by the BRIGC.

Despite their lower number of total and average references per a report, international rules like the CBD and CITES were used to define the goals of the BRIGC project standards rather than inform operational norms. The initial Green Development Guidance report states its project standards “have been guided by the Convention on Biological Diversity” and defines biodiversity “in accordance with the Convention on Biological Diversity” (BRIGC 2020). In the Case Studies Report on Biodiversity Conservation report, the cases presented are stated to be in alignment with the CBD (BRIGC 2021). CITES is only referenced in the same two reports to highlight how financial institutions banning investments in violation of CITES and countries leveraging CITES to protect endangered species. In the context of EPIL, eNGOs invoke international rules in order to pressure courts to mandate operational best practices such as thorough environmental impact assessments while rulings delivered by judges provide interpretations of said rules as general policy goals for China (Chu 2023). However, since there is little space for international rules to inform BRIGC operational procedures the local experiences of eNGOs holds less value in local deliberation processes influencing norm localization and subsidiary norm construction (Sun & Yu 2023).

The most frequently referenced norms (KBAs, EP, TCFD, EU Taxonomy, World Bank ESS, and IFC PS standards) are moderate to weak norms used as operational and procedural norms by the BRIGC. The IFC PS, EU Taxonomy, EP, is used in the categorization of BRI projects into positive and negative lists (BRIGC 2020, BRIGC 2021). Chinese financial institutions are encouraged to comply with TCFD and EP standards (BRIGC 2022) and BRI

stakeholders are recommended to emulate the World Bank's ESS industrial project standards (BRIGC 2024). Across these reports, the BRIGC opts to select moderate to weak international operational norms and repackage them into tools for BRI partners. Its 'green light system' collates these norms into guidelines that "comprehensively consider the dimensions of pollution, biodiversity and climate impacts" of different types of industrial projects and accordingly label them as red, yellow, or green light projects.

The localized and subsidiary norms produced by the BRIGC are not stark breakaways from internationally accepted practices nor do they seek to challenge the normative status quo. Rather, the BRIGC has curated aspects of operational norms with moderate normative strength to produce its own tools. On one hand, relying on norms employed by the international community ensures current BRI stakeholders can readjust their current practices and prospective stakeholders are not alienated by an unfamiliar mode of green project development. On the other hand, repackaging green finance standards does not address issues of inconsistent categorizations of what is "green" across this patchwork of standards (Babic 2024). Additionally, the BRI's audience of developing nations lack the financial capacities needed for green finance to be effectively mobilized without the developing world and reinforces relationships of dependency between the developing and developed worlds (Ciplet 2022).

As the BRIGC continues to deliberate its Green Development Guidance standards and produce reports on the progress made towards finalizing these standards, researchers should pay particular attention to the composition of its membership and the particular norms it references. Although some have claimed most Chinese eNGOs are mere mouthpieces for party interests (Jirous 2022), this paper has articulated the complicated relationship eNGOs like the CBCGDF have with state apparatuses because of their efforts to improve Chinese environmental

governance. Additionally, eNGOs appear to confine themselves to realms that best suit the pathways of influence they exert, although there is likely some level of prioritization political leaders place the norm dynamic roles that eNGOs are able to take on given the degree to which they are connected to the normative status quo.

This relative containment of eNGOs into domestic and internationally focused realms of norm dynamics may hint at a multi-level governance approach to realizing China's aspirations of greater influence over global governance wherein operational and procedural norms established in domestic spaces influence the general policy goal norms of international spaces in vice versa (Saito-Jensen 2015). Multi-level governance dynamics have been observed in other aspects of China's environmental governance (Cheng & Zhang 2023) and may provide direction for further research into Chinese eNGOs as normative actors. Future research in the norm dynamics of Chinese eNGOs could benefit from analysis of which of these two forces influences eNGO participation in political spaces for norm entrepreneurship more – eNGO desires to best leverage their influence or political leaders using their agenda setting power to favor eNGOs able to take on specific norm dynamic roles. Applying similar methods of QCA to larger bodies of reports including eNGO-published documents may lend further strength to the findings of this paper and inform how eNGOs engaging with norms of different strengths influences their actions as norm entrepreneurs.

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Appendix

1. BRIGC Partner Organizations

Environmental Departments of BRI Partner Countries

1. Ministry of Environment, Angola
2. Ministry of Nature Protection, Republic of Armenia
3. Ministry of Environment, Cambodia
4. Ministry of Science, Technology and Environment, Cuba
5. Ministry of the Environment, Estonia
6. Ministry of Environment, Forest and Climate Change, Ethiopia
7. Ministry of the Environment, Finland
8. Ministry of Environment, Climate Change and Natural Resources, the Republic of Gambia
9. Ministry of Environment and Natural Resources, Guatemala
10. Department of Environment, Islamic Republic of Iran
11. Ministry of Environmental Protection, Israel
12. Ministry of the Environment, Land and Sea, Italy
13. Ministry of Environment, Climate Change and Forestry, Kenya
14. Ministry of Natural Resources and Environment, the Lao People's Democratic Republic
15. Ministry of Environment, Climate Change and Technology, Maldives
16. Ministry of Environment, Solid Waste Management and Climate Change, Mauritius
17. Ministry of Environment and Tourism, Mongolia

Intergovernmental Organizations

1. Basel Convention Regional Centre for Asia and the Pacific
2. Global Green Growth Institute
3. Green Climate Fund
4. International Union for Conservation of Nature
5. Sustainable Development Solutions Network
6. United Nations Economic Commission for Europe
7. United Nations Environment Programme
8. United Nations Industrial Development Organization
9. United Nations Office for South-South Cooperation

Non-Governmental Organizations and Think Tanks

1. Appraisal Center for Environment and Engineering, MEE (China)
2. Association of Ecological Organizations of Kazakhstan
3. Beijing Normal University (China)
4. Biodiversity Conservation Center (Russia)
5. Bloomberg Philanthropies (USA)
6. Center for International Knowledge on Development (China)
7. Central Asia Regional Economic Cooperation Program (China)
8. Centre for Ecology & Hydrology (England)
9. Charhar Institute (China)
10. Chengdu Municipal Ecology and Environment Bureau (China)
11. China Academy of Urban Planning and Design, MOHURD (China)

18. Ministry of Natural Resources and Environmental Conservation, Myanmar
19. Ministry of Environment, Niger
20. Ministry of Climate Change and Environmental Coordination, Pakistan
21. Ministry of Ecology and Environment, the People's Republic of China (MEE)
22. Ministry of Natural Resources and Environment of the Russian Federation
23. Ministry of Sustainability and the Environment, Singapore
24. Ministry of Environment of the Slovak Republic
25. Ministry of the Environment, Sustainable Development and Nature Protection, Togo
26. Ministry of Climate Change and Environment of the United Arab Emirates

Enterprises

1. Aluminum Corporation of China
2. Bosco (China)
3. BROAD Group (China)
4. BYD Co., Ltd. (China)
5. China Electric Power Enterprises Federation
6. China Energy Conservation and Environmental Protection Group
7. China Metallurgical Industry Planning and Research Institute
8. China National Petroleum Corporation
9. China Nonferrous Metal Industry Association
10. China Petroleum and Chemical Industry Federation
12. China Banking Association
13. China Business Council for Sustainable Development
14. China Daily
15. China Electricity Council
16. China Institutes of Contemporary International Relations
17. China University of Political Science and Law
18. Chinese Academy of Environmental Planning, MEE (China)
19. Chinese Research Academy of Environmental Sciences
20. Chongyang Institute for Financial Studies, Renmin University (China)
21. Clean Air Asia (the Philippines)
22. Climate Policy Initiative (USA)
23. Energy Foundation China
24. Energy Research Institute, National Development and Reform Commission (China)
25. Environmental Law Institute (USA)
26. Global Center on Adaptation (the Netherlands)
27. Global Energy Interconnection Development and Cooperation Organization (China)
28. Global Infrastructure Basel (Switzerland)
29. Greenovation Hub (China)
30. Institute of Environmental Science and Research (New Zealand)
31. Institute of Finance and Sustainability (China)
32. Institute of Remote Sensing and Digital Earth, Chinese Academy of Sciences
33. International Green Technologies & Investments Projects Center (Kazakhstan)
34. International Institute for Sustainable Development (Canada)

11. China Railway Construction Corporation, Ltd.
12. China Three Gorges Corporation
13. CNNC Environmental Protection Industry Co., Ltd. (China)
14. Delta Aluminum Industry Co., Ltd. (China)
15. DNV GL (Norway)
16. Feili Group (China)
17. Hainan International Carbon Emission Trading Center (China)
18. IER Environmental Protection and Engineering Technology Co., Ltd. (China)
19. Industrial Bank Co., Ltd. (China)
20. iSoftStone (China)
21. Jiangsu Rainbow Heavy Industries Co., Ltd. (China)
22. JSTI Group Co., Ltd. (China)
23. National Demonstration Area for the Cooperation among China's Eastern, Central and Western Regions (Xuwei New Demonstration Area, China)
24. SAP China Ltd. (Germany)
25. Schneider Electric (France)
26. Shenzhen Energy Corporation (China)
27. SunEee (China)
28. The Carbon Trust (England)
29. Urumqi Economic and Technological Development Zone (Toutunhe District, China)
30. Wuzhou Communication Centre (China)
31. Yixing Environmental Technology Industrial Park (China)
32. Yunnan Water Investment Co., Ltd. (China)
33. Zhejiang Shenlian Environmental Protection Group (China)
34. International Institute of Green Finance, Central University of Finance and Economics (China)
35. International Network for Bamboo and Rattan (China)
36. International Road Federation (Switzerland)
37. Korea Environment Institute
38. Lancaster University (England)
39. Nanjing Institute of Environmental Sciences, MEE (China)
40. National Center for Climate Change Strategy and International Cooperation (China)
41. National Marine Environmental Monitoring Center (China)
42. Natural Resources Defense Council (USA)
43. Nicholas Institute for Energy, Environment & Sustainability, Duke University (USA)
44. Northeast Asian Studies College, Jilin University (China)
45. Oxford Sustainable Finance Group, Smith School of Enterprise and the Environment, University of Oxford (England)
46. Paulson Institute (USA)
47. Research Institute of Environmental Law, Wuhan University (China)
48. Rockefeller Brothers Fund (USA)
49. Satellite Application Center for Ecology and Environment, MEE (China)
50. Sequoia Climate Foundation (USA)
51. Shanghai Institutes for International Studies (China)
52. South China Institute of Environmental Science, MEE (China)
53. State Information Center Belt and Road Portal (China)
54. Stockholm Environment Institute (Sweden)
55. Taihe Institute (China)
56. Tongji University (China)
57. Tsinghua University (China)
58. University of International Business and Economics (China)
59. Visegrad for Sustainability (Hungary)
60. World Economic Forum (Switzerland)
61. Zoë Environment Network (Switzerland)

2. Individual Report Norm QCA Data

