



## **Submission**

**In response to:**

**Possible targets, indicators and baselines for the Post-2020 Global Biodiversity Framework and peer review of a document on indicators.**

### **Prepared by**

Bush Heritage Australia  
31 January 2020

### **For further information on this submission, please contact:**

Dr Rebecca Spindler, Executive Manager Science and Conservation, Bush Heritage Australia

E: [rebecca.spindler@bushheritage.org.au](mailto:rebecca.spindler@bushheritage.org.au)

T: +61 421 428 793

P: PO Box 329 Flinders Lane, Melbourne Vic 8009

### **Submitted to**

Convention Secretariat: [secretariat@cbd.int](mailto:secretariat@cbd.int)

and

CBD post-2020 Unit: [CBDPPost2020AUS@environment.gov.au](mailto:CBDPPost2020AUS@environment.gov.au)

# **Bush Heritage Australia’s submission in response to the Post-2020 Global Biodiversity Framework and review of indicators.**

Bush Heritage Australia is a national not-for-profit organisation, protecting millions of hectares of ecologically important land for the benefit of nature and all Australians. Operating nationally, Bush Heritage has an interest in and influence on the protection of our native species and natural landscapes. We work primarily in 19 priority landscapes that cover a vast and diverse subset of Australia’s human and environmental communities.

Within these areas we are focussed on restoring natural ecosystem health and the viability of native species both on our reserves and across the broader landscape. Aside from carefully managing our own land, Bush Heritage takes a collaborative approach to land management and biodiversity protection, engaging and working with others, across sectors, to protect natural assets at a landscape scale. Bush Heritage is involved in a number of significant species recovery programs across Australia, working with Traditional Owners, other not-for-profit organisations, farmers, governments and universities.

Bush Heritage would like to congratulate the CBD Team for engaging with stakeholders early, incorporating feedback, adopting a theory of change approach and for the collective hard work to develop Goals, Targets and Indicators that are, in the main, well-constructed to protect our environment and go some way to driving the 2030 Mission: “To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people”.

## **In brief, Bush Heritage Australia makes four key points in relation to the Framework:**

1. This draft is an improvement on the current framework, however, Bush Heritage encourages the CBD to greater ambition even than that already expressed in the Mission and subsequent Goals and Targets. Global biodiversity needs urgent action now to halt the scale of loss we are witnessing. There is now insurmountable evidence of this loss that can no longer be ignored or dismissed. We must tackle the systems and processes of our society that are tuned to propagate this loss without clear vision of the future. Unequivocal targets must flow from clear goals to halt or change the activities that lead to the loss of biodiversity and leave governments in no doubt as to the actions they must take to stem the loss, restore nature and achieve the global targets.
2. Effective uptake of the goals, targets, and indicators of the Framework would be considerably aided by including specific recommendations for legislative and regulatory frameworks within each of the signing parties. This will vary widely across government units, but outlining the hallmarks of successful policy, legislation and support to achieve the stated Goals would improve the success in achieving goals.
3. Further, implementation tools and case studies explaining processes that have been most successful in limiting harmful activity and promoting the work of conservation agencies would drive outcomes from this Framework, as would promoting innovative avenues for productive industries that limit harm and indeed improve natural ecosystem function and biodiversity values.
4. Continued consultation with international environmental agencies and productive industries showing innovative and collaborative tendencies throughout the development of the Framework and its implementation will add significantly to its value moving forward and the probability of succeeding in achieving measureable changes in the extent, integrity, resilience and function of natural ecosystems globally.

## Goals:

Bush Heritage is strongly aligned with the vision “By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people” and is in agreement with the sentiment of the 2030 and 2050 Goals presented in the Zero draft of the post 2020 GBF.

Bush Heritage would like the following issues to be given consideration in the further development of the Goals:

- 1) Percentages are used without a time or condition reference or baseline definition. A clear definition of reference states for extent and integrity per habitat, could be provided to ensure maximum compliance and the provision of helpful guidelines to those attempting to contribute to National and Global Goals.
- 2) Bush Heritage supports the consistent inclusion of equity for indigenous peoples, women and girls and the need for intergenerational justice. It would be equally fitting to recognise the need for justice and equity across the socio-economic strata as lower strata across and within countries are disproportionately affected by biodiversity loss, natural disasters and climate change;
- 3) The over-reliance on broad percentages with no associated overarching target on a per country basis may lead directly to perverse outcomes;
- 4) There is little focus on addressing the drivers of biodiversity loss. We have a unique opportunity now to alter the myopic view of “progress” in our society. This framework, built on the wealth of experience of many governments, their constituent agencies, non-government agencies and innovative industries, can provide alternative methods, ways of working and definitions of a successful society.

These comments also relate to the development of the Targets.

## Targets

Bush Heritage is supportive of the Action Targets overall and encouraged by the trend toward strong environmental measures that drive focused action in a concerted way. Below are specific comments on selected Targets and suggestions to avoid perverse outcomes as has been seen under the current system. The inconsistency between this set of Targets and those in supporting documents CBD/SBSTTA/23/INF/2 & CBD/SBSTTA/23/INF/3 is noted. Overall the Action Targets are stronger, more specific and more measureable.

All comments below relate to selected Action Targets in the Zero Draft.

### **1. Retain and restore freshwater, marine and terrestrial ecosystems, increasing by at least [50%] the land and sea area under comprehensive spatial planning addressing land/sea use change, achieving by 2030 a net increase in area, connectivity and integrity and retaining existing intact areas and wilderness**

The wording of this target is ambiguous, allowing the specific actions aiming to both retain and restore may be obfuscated. Mechanisms by which natural ecosystems might be retained should be delineated – including improving protection measures, transparency of decision making, incentives for protection and sustainable management of productive lands and prioritisation of areas to be protected based on biodiversity values rather than lack of productivity values. As referenced in the Goal section above, the reference to 50% provides no reference state or time from which to measure, allowing for parties to measure and report against moveable targets.

### **2. Protect sites of particular importance for biodiversity through protected areas and other effective area-based conservation measures, by 2030 covering at least [60%] of such sites and at least [30%] of land and sea areas with at least [10%] under strict protection.**

The index of only 60% of important biodiversity sites (Key Biodiversity Areas for example) is inadequate given the devastating loss these habitats have suffered already. Further, 10% of

protected areas slated for strict protection may allow the perverse outcome that destructive practices are allowed in 90% of protected areas. The majority of protected areas should maintain significant protection from all harmful activity.

**4. Reduce by 2030 pollution from excess nutrients, biocides, plastic waste and other sources by at least [50%].**

This aggregate number not only combines all industry types together, it also does not take into consideration the extreme events that may destroy entire ecosystems or human communities in a short time frame without impacting the average over a medium to long term assessment. Reduction of risk and impact of both average pollution as well as extreme events must be considered here. Again, uptake of incentives and protective measures that have been proven to work could be recommended as mechanisms of implementation.

**5. Ensure by 2030 that the harvesting, trade and use of wild species, is legal and at sustainable levels.**

This could lead directly to the perverse outcome of unwarranted legalisation of rightfully illegal wildlife trade to meet the Target. A Target that addresses the root cause of illegal and unsustainable wildlife trade could encourage coordinated international efforts to target and reduce illegal wildlife trade routes and facilitate innovative detection measures.

**6. Contribute to climate change mitigation and adaptation and disaster risk reduction through nature-based solutions providing by 2030 [about 30%] [at least XXX MT CO<sub>2</sub>=] of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity and food security.**

This Target has two clear omissions of the key drivers of climate change. Land clearing and adherence to fossil fuels must be addressed specifically here.

**7. Enhance the sustainable use of wild species providing, by 2030, benefits, including enhanced nutrition, food security and livelihoods for at least [X million] people, especially for the most vulnerable, and reduce human-wildlife conflict by [X%].**

The intent of this goal is supported but should be linked closely to Target 5 above and include advice that the benefits of the use of wild species must be seen by all people across the socio-economic strata (to avoid confusion over the definition of vulnerable), and be obtained with due respect to intellectual property of indigenous peoples.

**8. Conserve and enhance the sustainable use of biodiversity in agricultural and other managed ecosystems to support the productivity, sustainability and resilience of such systems, reducing by 2030 related productivity gaps by at least [50%].**

Indigenous managed lands should be mentioned in equal position with agriculture. Further, the outcomes of this target should be reframed to ensure the benefits of sustainable use of biodiversity are also seen by the natural ecosystem, to maintain balance of the use and benefit derived. Bush Heritage suggests the following wording: "Reducing productivity gaps and potential harm to the natural ecosystem as a whole by at least 50% from reference X."

**9. Enhance nature-based solutions contributing, by 2030, to clean water provision for at least [XXX million] people.**

This target appears to separate water from the environment and is represented only as a commodity for human consumption. Wording that encourages a balanced approach including the thoughtful design of industries and crops approved for specific areas based on natural values, sustainability of required resources and biodiversity impacts should be included.

**11. Ensure that benefits from the utilization of genetic resources, and related traditional knowledge, are shared fairly and equitably, resulting by 2030 in an [X] increase in benefits.**

Specific mention of indigenous intellectual property and the sharing of benefits should be made here.

**14. Reform economic sectors towards sustainable practices, including along their national and transnational supply chains, achieving by 2030 a reduction of at least [50%] in negative impacts on biodiversity.**

Reference to the alignment and implementation and regulatory frameworks of the economic sector within a country would help facilitate the uptake of these measures. This Target should also mention the impact of climate change on biodiversity specifically.

**E. Implementation support mechanisms/F. Enabling Conditions/ G. Responsibility and transparency**

Bush Heritage understands that these sections will be further developed through consultation, and would be pleased to attend any fora for discussion and contribution to these sections in detail.

**G. 16. The framework contains measures to monitor, review and report on its implementation at the national, regional and global levels.**

All reporting measures should be drawn from the same data sources that are generated by reliable, repeatable measures. This data should be reported with consistency at the State, Federal and International level, and thus should reflect requirements in legislation and regulation at those levels. All data should follow the principles of being findable, accessible, interoperable and re-useable. These principles reduce duplication of effort, increase transparency and reduce the risk of misreporting across sectors and borders.

**Indicators:**

Bush Heritage is supportive of standard indicators, but would request that special attention is paid to avoiding the following:

- the reduction of biodiversity to one or even the sum of its ecosystem services. The value of biodiversity is an intrinsic value. Further, the productivity of natural ecosystems relies on the function on healthy ecosystems – the exquisite and intricate links that form a thriving system. By valuing the production of a single value such as water or carbon we may see perverse outcomes that jeopardise the function of the system as a whole; and
- an unworkable level of specificity that a) disallows logical inclusion of beneficial activities because of wording of an indicator; b) drives unproductive effort in specific measurements that can lend little to other information gathering efforts; and c) discourages inclusion and engagement across all sectors because the indicator measures and methods are intimidating. Groups working to assimilate data from a large range of stakeholder groups such as Accounting for Nature or other Natural Capital assessors have tackled the issue of deciding logically which information is most useful in measuring the Target, and providing guidelines for agencies across sectors to provide data and relevant information on those measures so that the data may be accepted and fit the principles of findable, accessible, interoperable and re-useable. Consultation with this or like-minded groups is recommended.

**Bush Heritage would be available and pleased to attend any further fora to participate in discussions or answer questions.**