**Guidelines and template for the review of the draft monitoring framework for the post-2020 global biodiversity framework**

## Background

1. The second meeting of the Open-ended Working Group[[1]](#footnote-1) on the Post-2020 Global Biodiversity Framework invited the Subsidiary Body on Scientific, Technical and Technological Advice at its twenty-fourth meeting to, among other things, carry out a scientific and technical review of the updated goals and targets, and related indicators and baselines, of the draft global biodiversity framework. Under agenda item 3 the Subsidiary Body will consider this issue.
2. Tables 1 and 2, presents a draft monitoring framework for the 2050 Goals and the 2030 targets respectively. These tables are being made available for the purposes of peer review. In both tables’ interim formulations of the proposed 2050 goals and milestones and the 2030 targets are provided for context. Review comments are not being sought on these parts of the post-2020 global biodiversity framework at this time. Columns A, B of the tables provide draft monitoring elements and indicators to be used at the global level to monitor progress in the implementation of the post-2020 global biodiversity framework. Further column C provides information on the baseline year for the indicator and on the frequency that the indicator is updated where known. Review comments are being sought on columns A, B and C only.

## II. Submitting Comments

1. To ensure that your comments are given due consideration, please send them by e-mail to secretariat@cbd.int, at your earliest convenience but **no later than 25 July 2020**
2. When submitting comments, please adhere to the following guidelines as much as possible:
	1. Please provide all comments in writing and in an MS Word or similar document format using the table provided below.
	2. Please provide full contact information for the individual/Government/organization submitting the comments.
	3. Please avoid commenting on issues related to grammar, spelling, or punctuation, unless it affects the overall meaning of the text, as the document will be edited as the final draft is prepared.
	4. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest, if possible, what this text may look like or what should be included.
	5. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
	6. Please focus your comments on columns A (monitoring elements), B (indicators) and C (Indicator baseline year and frequency of updates) of the tables 1 and 2.
	7. If you are suggestion the inclusion of additional indicators please provide information on if the indicator is currently operational, the organization supporting its development, its baseline (i.e. the year data is first available) and how frequently the indicator is updated (i.e. monthly, yearly, every two years etc.).
	8. All review comments will be posted on the webpage[[2]](#footnote-2) for the post-2020 global biodiversity framework in the interests of transparency
3. Should you have any questions regarding the review process, please contact secretariat@cbd.int.

***III. Template for Comments***

1. Please use the review template below when providing comments.
2. The complete draft of the monitoring framework has been released in a portable document format (PDF). For tables 1, 2 and 3 column letters and row numbers have been provided as well as page numbers. Please use these as a reference as illustrated in the table below. General comments can be included in the table by referring to Page 0 and Line 0.

**TEMPLATE FOR COMMENTS**

|  |
| --- |
| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** |
| *Contact information* |
| **Surname:** | Kumah |
| **Given Name:** | Frederick Kwame |
| **Government** (if applicable)**:**  | n/a |
| **Organization:** | Africa CSO Alliance (Coordinator) |
| **Address:**  | Ngong Road, Karen, P.O. Box 310-00502 |
| **City:** | Nairobi |
| **Country:** | Kenya |
| **E-mail:** | fkumah@awf.org |
|  |  | ***Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
| 0 | 0 |  |  | While lessons from the Aichi Targets demonstrate the immense importance of a monitoring and indicators framework elaborated from the start, it is also true that innovations in data acquisition and processing revolutionize what is possible almost every 5 years. It will be immensely important for the GBF, particularly with its ambition to be relevant to 2050 in decadal time-steps, to be able to absorb these innovations over time. It is critically important to include this flexibility, to allow governments and actors to transform the indicators and monitoring framework with the correct justifications, and appropriate work done to assure complementarity and continuity with past data series that may be specified here.A further challenge is the vast diversity of local contexts, making it extremely difficult to address all local variations (in nature, economy and society) in a small group of headline indicators.To assist this process a model that facilitates grounding of the monitoring framework in real measures across nature, economy and social domains is critically important. The SDGs provide a theory of change that grounds the GBF, but the ACTUAL pathways of action and change need to be elaborated locally for monitoring to capture the real state of nature, economy and welfare in the diversity of contexts around the world. Facilitating the development of ‘SDG narratives’ can help this, which the reference doi:10.1016/j.marpol.2020.103973 provides a method for. Comments to this effect are made in the feedback form on “SDG linkages” provided alongside this document on the monitoring framework.The value of this from a monitoring and indicators perspective is that this process helps to identify variables and indicators that quantify actual interactions between nature, economy and social domains in specific local contexts. See table 1 and figs. 4a and 4b for illustrations of these metrics.The task for national and higher level experts and offices will be to aggregate these local indicators into more synthetic ones that enable governments to capture all this data into their SDG monitoring and reporting frameworks.Providing approaches for these varied physical/tangible indicators to be aggregated into the headline indicators for the GBF will help to accommodate the many contexts that people live in around the world, AND change that will occur in data acquisition and processing over the coming decades. |
| **Ecosystems/coral reef focus** |
| 1 | 2 | A | 1, 15 | Strongly endorse the independent inclusion of components on ecosystem extent and integrity, as these are essential together in measuring the health and status of ecosystems. |
| 1 | 2 | C | 8, 9 | Strongly endorse the variables as written: “live coral cover” is equivalent to the Essential Ocean Variable “Hard coral cover and composition”. However the term “live coral cover” is more accurately understood and is more succinct, in the context of the Convention, Parties and other stakeholders. “Global coral reef extent” as currently written to exclude “and condition” is correct, as condition is quantified by Live Coral Cover and other variables, and is not measured by satellite techniques that are used to assess extent. |
| 1 | 2 | C | 4, 5-12 | The Red List of Ecosystems is appropriately included for terrestrial ecosystems, but is equally relevant for marine ecosystems, particularly the shallow tropical systems included here. During 2020 the first regional data-driven RLE for coral reefs of the Western Indian Ocean will be published/released (Obura et al. in review, Conservation Letters), paving the way for global coverage within 3-4 years. The process will also be directly applicable to mangroves and seagrass systems, so may also be rolled out by 2025 by the RLE Parntership hosted by the IUCN.**Recommendation** - Strongly support inclusion of the RLE for coral reefs, and secondarily for mangroves and seagrasses as well. |
| 1 | 2 | A | 15 | “Ecosystem integrity and connectivity” … connectivity is one component of integrity (see CBD/SBSTTA/24/INF/9, page 8) so including it at this high level, while good for communicating among Parties and observers, may become confusing. Measures of connectivity may be included under the term ‘fragmentation’ in columns B and C.**Recommendation** – don’t include the term ‘connectivity at this level, but in B or C |
| 1 | 3 | C | 23 | The Red List of Ecosystems explicitly measures ecosystem integrity, so the Red List of Ecosystems is essential to use here as a direct measure of ‘fragmentation and quality’ of all ecosystems. So where Red List Index of species is cited under the ecosystem components, the Red List of Ecosystems is more appropriate.The Red List Index (species) for corals is included here, presumably as declining species status is an index of declining integrity – it should certainly be used under species components (A3), while its use here is more correlative, and may add value to information from the Red List of Ecosystems.**Recommendation** – include the Red List of Ecosystems as the most appropriate Red List indicator here. |
| 1 | 4 | A | 42 | Strongly support the inclusion of Critical ecosystems as a specific component in the monitoring framework |
| 1 | 4 | B | 42-49 | All of the monitoring elements mentioned are of ecosystem area alone, corresponding to Component A1, without any elements related to ecosystem integrity, as in Component A2. It is essential for Critical ecosystems that their integrity, not just their area, is maintained or increased, and certainly not degraded (see CBD/SBSTTA/24/INF/9, page 7).Further, the wording of the elements is confusing “Trends in area of coastal and marine areas conserved”. This means that if trends in the baseline period are negative, then this negative trend should be conserved. **Recommendation** –Suggested wording for all these elements should mirror that for A1/A2, such as “Area, fragmentation and quality of coastal and marine areas are maintained or restored”, though language is needed to identify the reference level/targets for maintenance and restoration. |
| 1 | 5 | B | 51 | “Trends in habitat creation and maintenance” – this term is quite non-specific. It, or an indicator in column C, could be written to reference ‘nature-based solutions’ for monitoring number, area and their effectiveness in providing their regulating/protection service. |
| 1 | 5 | C | 62 | Alternatively, from the point above, an indicator in relation to “Trends in regulation of hazards and extreme events” could include “Number and area of certified nature-based solutions areas with verified impacts on [hazard/impact mitigation] [or lives lost/property destroyed]**Recommendation** – include an indicator of biodiversity/nature-based assets/solutions that address hazards/extreme events. |
| 2 | 9 | C | 13 | The Red List of Ecosystems explicitly measures ecosystem area and integrity, so the Red List of Ecosystems is essential to use here as a direct measure of ‘fragmentation and quality’ of all ecosystems. So where Red List Index of species is cited under the ecosystem components, the Red List of Ecosystems is more appropriate.**Recommendation** –replace the RLI with the Red List of Ecosystems for coral reefs. |
| 2 | 8-9 | B | 6-22 | The list of ecosystems is somewhat arbitrary, based on indicators that are most available, but this may change significantly in coming years. It may be that a more generic monitoring element on ‘ecosystems’ could be stated, with clear guidance to greater resolution based on IPBES Units of Analysis and or ecosystems following the IUCN Global Ecosystem typology (Keith 2020 – see <https://seea.un.org/sites/seea.un.org/files/nicholson_iucn_rle_typology.v4.pdf> But more updated version is now available) **Recommendation** –replace the arbitrary list of ecosystems with a clear global (hierarchical) ecosystem typology. |
| 2 | 9 | A | 23 | The wording of this target should reflect more closely the need to maintain critical ecosystems, which may be intact, wilderness or essential for NCP provision (see CBD/SBSTTA/24/INF/9) |
| 2 | 10 | B | 25 | There is no need for specific citation of corals here, where ‘degraded marine and coastal ecosystems’ is mentioned in line 26. This reflects the challenge already mentioned above, where a more general specification of the Monitoring elements to cover all/key ecosystems/species/facets of nature may better serve the goals of the convention, with multiple possible indicators in column C. |
| 2 | 10 | B | 29 | ‘Converted’ agricultural lands may refer to agricultural land fully transferred back to a more natural system. However, guidance for restoring 10-20% of each km2 of agricultural/urban lands to natural habitats calls for a more general specification of this target, perhaps to ‘Trend in the area and proportion of agricultural lands restored to natural habitat’. Or include this in line 125, see below**Recommendation** –amend this element to reflect the need for natural habitat in agricultural/working/management land/seascapes. |
| 2 | 11 | A | 39 | ‘particular importance for biodiversity’ – this could be simplified as ‘critical ecosystems’ – where what constitutes a critical ecosystem is clearly defined elsewhere |
| 2 | 11 | A | 40,42 | Why do these exclude marine systems? **Recommendation** Should add marine. |
| 2 | 20 | A-C | 125 | See comment on line 29 above, **Recommendation** - include non-forest natural habitats and new guidance for incorporating 10-20% natural habitat in landscape mosaic of agricultural/managed ecosystems. |
| 2 | 21 | B-C | 128 | These indicators are on the final outcome, which depends on many factors, but with no indicators on the characteristics of the natural system.**Recommendation** - Include area, condition and role indicators quantifying the nature-based solutions themselves, as is done for T10.3 |
| 2 | 27-29 | B-C | 162-179 | See preambular comment on the need to include space for emerging indicators, as the current set of measurable indicators is insufficient for full measurement of achievement of GBF goals and targets. Can mention processes that will identify these, such as the Science-Based Targets for Nature (SBTN) process. Further, the contribution of the GBF will be more tangible if indicators focus on NCP use and production relative to thresholds/reference points for sustainability, rather than on instruments/policies.**Recommendation** – include text that can address the above points. |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Sustainable use comments** |
| 1 | 5 | A | 51, 64, 68 | The three classes of regulating, material and non-material contributions are commendable, to assure that the elements of the framework and indicators are comprehensive, and that this framework is consistent with the IPBES-NCP classes and categories. It will be very important for the general framing of the monitoring framework to emphasize inclusivity rather than exclusivity of indicators. See following comments on indicators.**Recommendation** – retain the three Components for goal b. |
| 1 | 5 | B | 51-71 | This is a very strong framework, basing the monitoring elements on the 18 NCP classes. Efforts to change this should be strongly resisted, as the NCP framework has been negotiated extensively, accepted by the IPBES plenary, and has structured IPBES global and regional assessments, and future assessments. Thus any adaptations to that framework will also be able to be incorporated here, if this becomes relevant with advances in science and practice.Further, building on the preambular comments (line 0) on the SDGs providing the Theory of Change behind the GBF, the NCP classes provide the comprehensive inventory of peoples’ transactions with nature that need to be made sustainable, in order to not degrade nature indicators under goal a. If the scope of coverage of NCPs is reduced or undermined the potential for hidden/unaccounted damage to nature increases, undermining the Vision of the GBF.**Recommendation** – retain the 18 NCP classes as Monitoring Elements for goal b. |
| 1 | 5 | C | 51-71 | The selected indicators of Natures Contributions to People are somewhat arbitrary. For example, the focus on ‘forests’ as production systems rather than other ecosystems (such as grasslands, mangroves, coral reefs, agro-ecological systems, etc) reflects bias in the recent science and literature, not the true dependence of people on nature. It would be preferable here to identify the types of measures that should be included in any system-relevant monitoring framework. Indicators should be consistent with those identified under Goal A for species and ecosystems, to enable tracking the health of those natural assets and production from them, and be based on trends and science-based thresholds, of:1. Physical/stock indices of the NCP itself – e.g. timber, animal counts, fish caught, pollination levels, etc, plus
2. Sustainability-based reference indices such as against Maximum Sustainable Yield (though recent improvements of this should be used) and certification-based indices (as in the examples given) from which tangible data can be derived.

**Recommendation –** adopt indicators based on the physical provision of NCPs from natural assets, plus reference systems relating to the sustainability of their production and use over the long term.The indicators framework should then incorporate processes for aggregating different variables from different systems under headline indicators. These would likely have to be non-unit metrics scaled from 0 (no use) to 1 or 100 (sustainable) (with > 1 or >100 indicating excess use and impacts to the system) so data from disparate systems can be combined. Alternatively, scientific disciplines could be tasked to identify system-specific thresholds so that variables can be reported in their natural units.**Recommendation –** adopt a sustainability framework for aggregating indicators that a) abstracts from the individual cases so that synthesis/aggregation is possible, and b) includes explicit limits/thresholds for assessing sustainability.Relevant indicators should also be aligned with direct benefit SDGs (6,7,8,9,11) – some will fit with the existing SDG indicator framework, but it is also limited, so the monitoring and indicators framework in the GBF can be used to improve and make more systematic the SDG monitoring/indicator framework.**Recommendation –** align indicators at this level with the sectors covered by the SDGs.This point further illustrates the value of the SDG narrative approach in doi:10.1016/j.marpol.2020.103973, in which the relevant ecosystem (and other) indicators can be specified from the bottom up. What is important at this level in the GBF monitoring and indicators framework is to be inclusive such that potentially specialized and unique cases CAN be aggregated into more summarized reporting at national and international levels. This addresses the tension addressed in CBD/SBSTTA/23/INF/4 in Table 1 between the “limited set of global and national indicators for reporting on global targets” versus setting process to support a “flexible framework of ‘indicative’ global and national indicators for reporting on global targets”.**Recommendation –** use the SDG framework for alignment of tangible local/NCP indicators and with higher level indicators for target/goal/SDG reporting. |
| 1 | 5-6 | B | 51-71 | Also incorporated into each NCP class should be indicators addressing benefit sharing as in lines 74-76 for genetic resources. So indicators of equity in a) access, b) utilization and c) monetary and non-monetary benefits from all 18 NCPs need to be considered. This marks a significant addition to the monitoring framework than has been used in the Aichi Targets, in the SDGs and as so far proposed here for the GBF. Accordingly, an additional Goal Component could be proposed for Goal b, such as “The benefits, from utilization of biodiversity resources are shared fairly and equitably”, mirroring the language of Goal c. To support this Goal Component (B4), two monitoring elements could be added also mirroring goal C, on 1, access to and 2, sharing of benefits. Potential indicators could include:* Number/trends of users that have access to NCPx
* Number/trends of users that benefit from NCPx
* Income/benefits derived from NCPx, in a) units natural to that NCP, and b) monetary units, if appropriate
* Disaggregation of access and benefits by gender, age group, country, marginalized groupers, etc.

**Recommendation –** a goal component, monitoring elements and indicators to be added to include all aspects of access and benefit sharing under goal b. Note: if deemed more appropriate, these elements may also be considered for inclusion under goal c. |
| 2 | 18 | A-C | 103-116 | Target Components 8.1 and 8.2 cover terrestrial and aquatic biological resources, focusing on species that are fished or hunted, respectively, then breaks these down into monitoring elements and indicators that reflect indicator availability, but not a comprehensive scope of the building blocks/requirements for sustainability (see comments on lines 51-71 above). For example, under 8.2 an equity indicator is shown in line 115 (Average income of small- scale food producers, by sex and indigenous status (SDG indicator 2.3.2)) for terrestrial species, but a similar one is not shown under 8.1 for aquatic species. While it is recognized that the framework is being built up to identify currently ready indicators, without clear organizing principles the imbalance and inadequacy of the overall framework may render it ineffective to meet the biodiversity vision. Thus, as for Goal b (comments in lines 51-17), the Target components, monitoring elements and indicators need to be structured to be complete/holistic to make space for emerging indicators in the future, while giving examples of available indicators today.From this perspective, and using the existing indicators in the table, it may be most productive to identify monitoring elements for any resource (e.g. a fishery) to include: trends in the stock, trends in sustainable management, trends in population & extinction risk of the stock and affected (e.g. bycatch) species, AND trends in income/equity indicators (as suggested for lines 51-71 above). Within this framework, the monitoring/indicators framework can list examples of these indicators that ARE available, from the current list shown in C.**Recommendation –** re-orient the monitoring framework to be synthetic, giving example/available indicators but making it clear how new indicators can be developed for systems that currently don’t have indicators. |
| 2 | 20 | A-C | 117-126 | Target 9 is about ‘managed’\’working’ ecosystems (see CBD/SBSTTA/24/INF/9), which is appropriate, and Components 1, 2 and 3 are about terrestrial, aquatic and forest systems. However, as in the comments on Target 8, a systematic overview of indicators needed should be developed, then populated with those that are available, and giving guidance on priority ones to be developed. Given that this Target is about managed ecosystems, then the range of indicators that might be included is similar to those under Goal A/Target 1, plus those related to use and equity, thus:* Ecosystem extent and integrity
* Managed species abundance and stocks
* Genetic diversity
* Use/offtake/provision of relevant NCP
* Access to and sharing of benefit
* Regulatory coverage (e.g. sustainable management regimes)
 |
| 2 | 20 | A/B | 125 | Target 9.3 should be more explicitly about plantation and managed forests, as the current language could include natural forests, which are addressed under Target 1.**Recommendation –** make language more explicit to managed/plantation forests. |
| 2 | 21 | C | 128 | See comments to Table 1 line 62 on extreme events under Goal b. An indicator should be included that is on the natural asset itself that protects from hazardous/extreme events. This/these can then be based on the status indicators for that asset (e.g. an ecosystem such as a mangrove forest, which may be natural or planted/managed), thus linking indicators and efforts across Targets and Goals.**Recommendation** – include an indicator of biodiversity/nature-based assets/solutions that address hazards/extreme events. |
| 2 | 22 | A | 140 | There is no target equivalent to Target 12 (on genetic resources) specifically on equitable access and benefit sharing in relation to species, ecosystems and NCPs. In comments on other targets, and goal b, we have suggested indicators and how to incorporate this into those elements of the framework, but it is worth considering if it should be elevated to a target – either parallel to or included in Target 12. See also CBD/SBSTTA/24/INF/9 on goal d of the Zero Draft GBF.**Recommendation** – comprehensively include targets and/or target components, monitoring elements and indicators on equitable access to and sharing of benefits from species and ecosystem facets of nature, as well as genetics. |
| 2 | 25-27 | A | 152-161 | Target 13 is on integrating ‘biodiversity policies’ into laws and regulations, etc. The wording of this Target closely follows the historical focus in the Convention on the state of nature. However it does not address the emerging focus on goals b and c - sustainable use and equitable access and sharing. **Recommendation:** consider adding Target components that reflect these two aspects, to motivate and track progress on Sustainable Use (goal b) and benefit sharing (goal c) in national policies, legislation, etc.  |
| 2 | 25-27 | A | 152-161 | The Convention understandably focuses on national legislation and action, but special case that is left out from this is the High Seas. Recognition of the importance of Biodiversity Beyond National Jurisdiction (BBNJ) in the re-negotations of UNCLOS should be mentioned, emphasizing country and collective obligations under that process.**Recommendation:** consider an indicator specifically tracking national commitments in the BBNJ process and its implementation. |
| 2 | 27 | B-C | 162-193 | Targets 14 and 15 address sustainable production and consumption practices. These are essential for reducing drivers of loss and the links of indicators to SDGs are highly relevant. Linking performance assessment to more physical measures of state of nature (ecosystem and species indicators under Goal a and Targets 1-6) might also be appropriate, and giving a more general framework to enable development of indicators to fill gaps may also help. There are specific processes to identify sustainable targets for producers and consumers and these could be relevant here. One that may be very important for Target 14 is the Science Based Targets Network (SBTN)**Recommendation** - adding language to incorporate meeting sustainability targets could be impactful, e.g. in line 173 – not just publishing sustainability reports, but meeting science-based sustainability targets. |
| 2 | 31 | B | 193 | Target 15.3 on people’s responsibility is entirely appropriate, but falls far short of the equity requirements in goals b and c, which also include more direct responsibility for past impacts and declines in nature. Developing more precise goal elements on equitable sharing of responsibility to reduce impacts/contribute to gains in nature between different countries, sectors of society (SDGs 5 and 10) would be relevant here, as well as specific indicators on this.**Recommendation:** add a goal element, with relevant indicators, on balancing/redressing past impacts on biodiversity, sustainable use and benefit sharing. |
| 2 | 33 | B-C | 205-210 | Target 17 is on ‘incentives harmful for biodiversity’, which include subsidies, and Monitoring element 17.1 cites “biodiversity conservation AND sustainable use”. As with other targets, the focus is strongly on ‘biodiversity positive’ actions, but less so on the ‘people centred’ components that should go alongside these, and make the nature positive results possible. This target could also address non-subsidy instruments that promote and entrench discrimination, prevention of equitable access and sharing of benefits, and actions that impact nature incentivized by an inequitable system. **Recommendation:** The monitoring elements and indicators need to include linked people-centered AND nature-positive actions, and go beyond subsidies to address other incentive structures that are harmful to both. |
| 2 | 36 | A-C | 225-238 | Target 19 is on traditional knowledge, and ensuring it is valued, used and contributes to the vision 2050. The focus of the Target components, monitoring elements, and indicators is on traditional use in relation to ‘biodiversity’ though implicit in the nature of traditional knowledge is that iT fundamentally includes aspects related to sustainable use, and to indigenous values and beliefs important to local rights to benefits, and welfare. **Recommendation:**The Target components, monitoring elements, and indicators should be broadened to reflect the two additional components locl and traditional knowledge, in relation to sustainable use and benefit sharing. |
|  |  |  |  | Additional indicators that need to be included in the framework1. Including goal 5.a. of SDGs could add value to protection of biodiversity by ensuring that women have equal access to land, natural resources and other property. However, in articulating the indicators, the SDGs only focused on women’s access ,use and control of land but did not provide an indicator of women having ownership, access and use rights for natural resources
 |
|  |  |  |  | There is already recognition that increasingly, much of the population will be urban. To realize the vision of “Living in Harmony with Nature” and to avoid practices of sacrificing /degazetting natural resources to give way for urbanization, it would be precautionary to incorporate Goal 11.4 of SDGs and its indicator 11.4.1 |
|  |  |  |  | Governments are very big consumers/buyers of resources (e.g. furniture for offices and schools) and food (for relief, refugees, etc.) mainly provided by private companies and individuals. In addition to SDG 12.6 and its indicator 12.6.1 focusing on reporting of sustainability practices already included, it would add value to also include indicator 12.7 and its indicator 12.7.1 focusing on sustainable procurement |
|  |  |  |  | As trade is one of the drivers of biodiversity loss, it a great omission to leave out SDG 15.7 and its indicator 15.7.1 and SDG 15.c and its indicator 15.c.1 on combating poaching, trafficking of protected species and illegal trade. |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

*Comments should be sent by e-mail to* *secretariat@cbd.int****no later than 25 July 2020****.*

1. [CBD/WG2020/REC/2/1](https://www.cbd.int/doc/recommendations/wg2020-02/wg2020-02-rec-01-en.pdf) [↑](#footnote-ref-1)
2. <https://www.cbd.int/conferences/post2020> [↑](#footnote-ref-2)