Template for the review of the document on scientific and technical information to support the review of the proposed goals and targets in the updated zero draft of the post-2020 global biodiversity framework

TEMPLATE FOR COMMENTS

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General comments

We, together with a number of other organisations, are convinced that a clear path to net gain of biodiversity and nature's contributions to people by 2030 ('curve A' on page 3) reflects the level of ambition that is needed. We therefore suggest that SBSTTA24 recommend that the OEWG refine the draft mission statement of the GBF to aim for 'nature positive' by 2030.

We note with concern the lack of integration of the role of the finance sector, in particular in paragraphs 109, 110, and 121.

- According to document CBD/SBI/3/5/Add.2 paragraph 13. (a) *Mainstreaming biodiversity within the finance sector, via assessments of dependencies, impacts and risks, helps to reduce biodiversity loss and the subsequent costs.*
- In addition, the finance sector is identified as a key actor in paragraph 18: *The finance sector: Providing financial services to businesses, individuals and governments, some key actors in the finance sector include central banks and other regulators, commercial banks, institutional investors and asset managers (including pension funds), the insurance industry, and national, regional and international development banks.*
- In order to reduce or redirect resources causing harm to biodiversity, CBD/SBI/3/5/Add.2 paragraph 23. recommends to *Identify and incorporate biodiversity impacts, dependencies and risks into the strategies, operations and processes of the finance sector with a view to avoiding or minimizing net harm to biodiversity and ecosystems caused by investment decisions.*
- Among the suggested targets in document CBD/SBI/3/5, in Annex I, the target in paragraph 3 (c) reads *By [2025], financial institutions at all levels, including international development finance institutions, have integrated biodiversity into risk assessment policies and processes, are demonstrating at least decreasing negative impacts of investments in their portfolios and increasing the amount of dedicated finance for biodiversity and are reporting on risks, impacts and financing.*

We recommend that these elements be integrated in the document.		
We note with concern that the Rights-based Approach (RBA) is not referred to nor discussed as such in the document. Elements of an RBA approach are only mentioned with reference to selected targets: Indigenous Peoples in Target 7, 19, 20 (and missing in key targets such as 1 and 2). Customary Sustainable Use only mentioned with reference to target 4. In the scope of the proposed goals and targets, LBO-2 is cited but 2 of the 6 critical transitions proposed in that report, culture and governance, are not discussed. There is also no reference to the right to a healthy, safe, clean environment and sustainable development. It is mentioned that gender is an important consideration across the framework but this is not yet adequately reflected in the targets. We recommend that the document discusses the importance of the RBA for the GBF and how the RBA could best be integrated in a comprehensive way in the GBF.		
We support the calls by a number of Parties during the informal virtual session of SBSTTA 24 in February 2021 for the framework to be strengthened with regards to its reflection of the ocean, including the need to strengthen indicators for marine and coastal biodiversity. We furthermore note that this document has a terrestrial bias and suggest that the reference to and inclusion of marine and coastal biodiversity elements be similarly strengthened given that the references to marine and coastal ecosystems are largely absent, even under relevant targets, where terrestrial examples and references are given preference.		
Specific comments		
Page	**Paragraph**	**Comment**
3	8	We suggest that the observation in this para that *the information in this note is linked to a number of additional documents* is relevant to the monitoring framework of the GBF. We note with concern proposals to only adopt headline indicators at COP15. The experience from delayed adoption of indicators for the Aichi targets showed how detrimental this delay was for progress towards achieving the Aichi targets. We suggest that the evidence and experience from 'Aichi' be included in the document and that it recommends, based on that experience, the simultaneous adoption at COP15 of the GBF and the fully developed monitoring approach, including headline, component and complementary indicators so that tracking of progress can begin immediately. Where indicators are not yet available, those can be designated for further consideration by the AHTEG.
3	11	We, together with a number of other organisations, are convinced that only the approach that provides a clear path to net gain of biodiversity and nature's contributions to people by 2030 ('curve A') reflects the level of ambition that is needed if we are to keep the biosphere operating in a manner that produces the goods and services on which humankind is dependent, as well as to effectively combat the interrelated biodiversity,climate, and health crises. We therefore suggest that the document proposes that CBD SBSTTA-24 recommends the Open-ended Working Group on the Post-2020 Global Biodiversity Framework refine the draft mission statement to clarify that it aims for a net gain in the status of biodiversity and nature's contributions to people ('nature positive') by 2030. See the attached note for an explanation of this proposal.
5	18	We note that **significant** net increases of the extent of some ecosystems may not be achievable (e.g. for coral reef ecosystems) and so we recommend to further emphasise in the document the need to avoid further loss, while improving integrity and connectivity for overall net gain in the contribution of ecosystems to biodiversity and people.

5	19	● We propose that the second to last sentence be edited to read "*Net gain, or no net loss approaches, if not qualified, carry high risk of harmful outcomes,* ***especially in the marine environment"*** ● The suggestion in the last sentence of para 19 proposes use of replacement of same or similar ecosystems where critical ecosystems are lost. We urge caution in applying any such wording as this could result in unintended consequences - especially in the marine environment.
5	19, 21	Customary sustainable use and the role of indigenous and local communities' practices and innovations could be noted here in the document given their importance in areas beyond 'natural ecosystems' such as mosaic landscapes, restoration, and habitat connectivity
5	22	This paragraph states that "*Proposed target 1, addressing land-/sea-use change, contribute directly to improving ecosystem extent, while targets…*" We would argue that in the marine environment, addressing land/ sea use change could also lead to improving ecosystem **integrity**. Therefore we propose to edit the sentence to include "and integrity", to read "Proposed target 1, addressing land-/sea-use change, contribute directly to improving ecosystem extent **and integrity…**"
6	26	"*Halting human-induced extinction completely by 2030 is likely not realistic, especially given that certain threats such as climate change will continue to intensify and there are unavoidable time lags associated with conservation action. However, where both the species at risk and the drivers of decline are known, extinctions can probably be avoided given sufficient political will and investment*" Para 58 adds: *'....active measures…....have demonstrated that, in principle, it is possible to prevent extinction in most cases where both the species and the cause of the threat are known.'* We suggest that in most cases, the causes of threats are known and that therefore, halting human-induced extinction by 2030 is possible and we propose to add this to this paragraph. It necessitates transformative changes in land and sea use, resource use efficiency, production and consumption patterns (particularly for food), resource mobilisation and inclusive decision-making (as well as improved in situ and ex situ conservation actions). These changes will require the political will to agree and implement ambitious targets for 2030. We would also like to point out that a target that does not aim to halt species extinction by 2030 would be a substantial regression compared to the relevant aichi target, which aimed to prevent the extinction of known threatened species by 2020.[1] Lowering ambition would go against the principle of non-regression.
6	26	At the end of the paragraph, also organisms critical for soil fertility should be mentioned in the list. Those are critical for food security and nutrition.
7	32 & 33	We suggest that the statement *'..current knowledge suggests a minimum of 90 per cent by 2050 would be consistent with the 2050 Vision.'* is reasonable, but we note that plant conservation often aims for a minimum of 95% of genetic diversity maintained in perpetuity (Marshall and Brown 1975, CSIRO), and thus the ambition could be increased to

[1] Aichi target 12. By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.

		95%. This is feasible, yet ambitious, and is measurable directly with genetic data and indirectly via acceptable proxies including recent indicators (CBD/SBSTTA/24/3/Add.1) and we suggest that this level of ambition is recommended in the document. Where-as paragraph 33 refers to targets that impact on genetic diversity, there is no reference to (a numerical value for) generic diversity in the targets of the updated zero draft of the GBF. We suggest that this gap is identified in the document.
8	34	Reference to spiritual and strong bonding could be noted here among the non-material contributions of nature to people so as to make reference to Indigenous Peoples and local communities and their special bond with nature
8	36	We suggest to add reference to governance in addition to manage distribution
8	39	We suggest that points a to d (together with their numerical values) provide a more concrete, specific and comprehensive set of milestones for this goal than what is proposed in the updated zero draft of the post-2020 global biodiversity framework. We therefore propose to add a sentence at the end of this paragraph as follows: *In order for the post-2020 global biodiversity framework to address nature's benefits to people in a comprehensive manner, these elements, including their numerical values, should all be included as milestones.*
9	39 (c)	We propose that the document may add to the reference to 4 billion people who rely on natural medicines, that the targets in the updated zero draft of the GBF should address or reference this.
11-12	51-53	This document has a terrestrial bias and could usefully draw on the available experience in applying marine spatial planning. Furthermore, the document should recognize that marine spatial planning is one of several tools for addressing changes in sea use. Note: We recommend that Parties avoid, as much as possible, subjective terms such as "most" and qualifiers such as "where possible" to make targets clearer, while recognizing that some flexibility will be needed.
12	52-53	Spatial planning is a necessary but not sufficient tool to guarantee to allow for socio-economic development and biodiversity conservation. Governance is a critical driver here that should be mentioned. We also suggest to reference territories and lands of IPLC that contain 80% of biodiversity and are largely 'natural habitats'
12	54	We propose that the document may add to the reference to *effectively and equitably managed*, that target 2 in the updated zero draft of the GBF should cover the equitable dimension.
12-13	54-56	Target 2: it would help to be specific about protection of at least 30% of the planet - both on land **and at sea**. The explanatory paragraphs are heavily focused on land surface/ land area. In particular, paragraph 56 refers only to land and land-use changes. In this context, reference should be made to the existing descriptions of areas meeting the criteria for "ecologically or biologically significant marine areas (EBSAs)" that have been acknowledged by the CBD to be areas in need of protection.
18	72	● The document does not explain the relationship between the specific targets (in %) for different kinds of pollution with the overall ambition of the target that "*pollution from all sources should be reduced to levels that are not*

		harmful to…". We recommend that the document includes scientific information for the different kinds of pollution about the pollution reduction (in %) required to achieve levels that '*are not harmful to*' biodiversity, ecosystem functioning and/or human health. ● We agree with the statement that: "*Different metrics will be needed for different types of pollution*". We also propose that reference be made to the need to further develop and adapt indicators for different types of pollutants (e.g. noise) and in different geographies, e.g. adapting the Index of Coastal Eutrophication (ICEP) for use in geographies that do not have river systems, e.g. many island systems.
18	74-75	Nature-based solutions are equated with ecosystem based approaches. This does not necessarily clarify the use of the term in the context of GBF. We note the important references to fairness, equity, and inclusion of IPLC (should be men and women) in the development and implementation (....). We propose that the document identifies that these elements need to be strengthened in the target and indicators.
20	80	Scientific evidence is solid about the negative impact on biodiversity of the agricultural practices mentioned in this paragraph. We therefore propose to delete 'tend to' in the following sentence: *"In addition, many agricultural practices, such as intensive tillage, inappropriate or excessive fertilizer and pesticide use as well as the overuse of antibiotics in livestock also* ***~~tend to~~*** *reduce biodiversity".*
20	80	"*To achieve the 2050 Vision and the proposed Goals of the post-2020 global biodiversity framework there is a need to increase the productivity (i.e. reduce productivity gaps) of production landscapes, and in particular of existing agricultural areas, in order to limit and reduce the demand for land and water resources"* Productivity can be defined in different ways (e.g. production per worker or per dollar invested are amongst the most used definitions). We propose that this section clarifies that it discusses increasing productivity (measured both in terms of calories and nutritional values) per hectare and liter of water used. We also suggest that the document recommends that this should also be made explicit in the proposed target or, in order to avoid confusion, that the target instead focuses on the broader need to transform food systems for Nature and People. The document should also discuss that in order to use less land and water, we should not only address how food is produced but also how it is transformed and consumed. Reducing food waste and loss and a transition toward sustainable and healthy diets have the potential to massively decrease the amount of land and water needed. The importance of protecting and restoring soil biodiversity to maintain and increase productivity should also be underlined. In addition, we suggest that the document factors in that these actions should be undertaken not only while *"reducing pesticide use, overuse of fertilizers and water and improve the management of soils and forests*" but while safeguarding and enhancing the capacity of "production landscapes" to halt and reverse biodiversity loss. This implies the adoption of practices and approaches that e.g. strengthen the connectivity role of agricultural land.

		In order to ensure that the GBF is based on science, all those elements should be addressed within an holistic target on transforming our food systems. Focusing only on productivity (in particular without a clear definition) could result in support for practices and approaches that do not reverse the loss of biodiversity, or worse still, lead to increased rates of biodiversity loss. We recommend that the document discusses this issue.
20	80-81	We suggest that this section includes reference to indigenous and rural agricultural systems that have long implemented conservation agriculture and agro-ecology.
26	102	*Substantial and widespread changes to harmful incentives, will be a necessary and critical step to ensure the conservation and sustainable use of biodiversity. "Substantial and widespread changes"* are insufficient. Moreover, this formulation does not properly define the nature of the change that is needed to halt and reverse biodiversity loss. As long as incentives remain harmful, they will also remain an indirect driver of biodiversity loss. Only the elimination or repurposing of the direction of all incentives will contribute to hating and reversing biodiversity loss. We recommend that the document includes this clarification.
27	104	*Financial savings from redirection, repurposing, reform and/or elimination of harmful subsidies has the potential to make resources available for the conservation and sustainable use of biodiversity as well as for other societal objectives*. Although the potential may exist, the concept of "redirecting" harmful subsidies - using the money freed up due to elimination of harmful subsidies and directly transferring it to financing for biodiversity - fails to reflect the fiscal and budgetary processes in most countries: financing available for biodiversity will, in most cases, be decided independently of subsidy reform. We suggest that the document takes into account this observation.
27	104	*A necessary first step in reaching a target on this issue is the identification of those incentives which are harmful to biodiversity. In most countries and regions, there are likely to be a number of incentives which are having negative effects on biodiversity.* We suggest to add in the document that the identification of harmful incentives to biodiversity needs methodologies that are standardized and can be easily implemented by all parties.
27-28	106	*Biodiversity funding through international flows including official development assistance doubled during the last decade, but total funding is estimated to have increased more modestly.* We suggest that the WWF Barometer on CBD Resource Mobilization (2020) confirms this conclusion and could be used as a reference. The document is available here: Barometer on CBD's Strategy for Resource Mobilization.
28	108	*These estimates suggest a funding gap of the order of $700 billion per year. However, this gap could be closed substantially by subsidy reform (see proposed target 17) both by reducing the need for finance and through the contributions that may be made from redirected subsidies.* *1.* See observation above re. redirecting subsidies 2. We recommend that the document includes reference to the fact that, even if substantive subsidy reform will take place in the urgency that is required, it will most likely take time for significant progress to have impact. Until this is the case, additional financing, from all sources, is necessary to address the large funding gap.
28	109	*Actions towards this target should bear in mind the provisions of Article 20 of the Convention. A combination of resources from domestic and international sources as well as from the public and private sectors will be needed. Some*

		additional resources could come from a combination of (a) reducing subsidies causing harm to biodiversity and thereby reducing the total funding need; reducing financial flows that are harmful to biodiversity is not limited to harmful subsidies. Private financial flows, including from financial institutions, need to be included under (a) of this paragraph or added as a separate sub-point. This would be consistent with the recommendations made by the panel of experts (CBD/SBI/3/5/Add.3) and the respective SBI document (CBD/SBI/3/5) as well as with recent statements made by parties, such as during the informal virtual sessions in preparation of SBI-3. We suggest that the document includes this in this paragraph.
28	109	*(b) making use of funds redirected from subsidy reform;* Although repeatedly suggested by some parties and stakeholders, this has proven to be politically infeasible. Simply "redirecting" harmful subsidies - using the money freed up due to elimination of harmful subsidies and directly transferring it to financing for biodiversity - fails to reflect the fiscal and budgetary processes in most countries. Financing available for biodiversity will, in most cases, be decided independently of subsidy reform and we suggest the document discusses this issue.
28	110	This section neglects the role of the finance sector as a relevant indirect driver of biodiversity loss and thus requiring appropriate attention in the targets of the GBF, as recommended by the panel of experts on resource mobilization, in particular in their third report (CBD/SBI/3/5/Add.3) and in SBI document CBD/SBI/3/5. We thus propose that this is added to this paragraph. We also note a growing consensus among parties as well as financial institutions that alignment of private financial flows with biodiversity should be addressed in the GBF.
28	107	*Determining funding needs for the implementation of the post-2020 global biodiversity framework is challenging given that the framework is still under development and different methodological approaches exist for estimating financial needs.* We recommend including in the document the suggestion that using BIOFIN methodologies or developing a toolkit could be approaches to identifying funding needs.
29	113	We propose that the document may add to the reference to the knowledge, innovations, practices, etc. of IPLC, that the language of the target #19 should reflect this dimension adequately
29-30	115-117	We welcome the strong justification for target #20. However, we note that this target includes many different elements. We recommend that the document refers to the usefulness to consider that these elements could maybe be better addressed by an additional target or sub-targets on: gender; environmental defenders and the right to a healthy environment; IPLC rights to land and resources; equitable participation in decision-making related to biodiversity and whole of society approach.
30-31	121	This paragraph states that financial resources, as an indirect driver, are addressed by target 18. However, target 18 addresses the mobilization of resources, from all sources, which is not an indirect driver, but a means of implementation. Nevertheless, financial flows are a significant indirect driver of biodiversity loss - both in the form of public incentives such as subsidies (which are addressed in target 17) and in the form of public and private financial flows in the financial markets, such as investments. The role of public and private financial flows in the financial markets is not addressed in the undated zero draft of the GBF. We recommend that this gap should be highlighted in this paragraph as well as in paragraphs 109 and 110.

31	122	Paragraph 122 analyses how the proposed goals and targets address two key concepts in the IPBES *Global Assessment*: 1. interventions (levers) for transformative change to address indirect drivers, and 2. key leverage points - where efforts yield exceptionally large effects. Given the importance of addressing the root causes of biodiversity loss, amd to prioritise interventions which will have the most impact, we would like to suggest that each of these levers and leverage points be systematically covered. At the moment the document only provides commentary on some of them: 1. Interventions (levers): the document identifies that two of the five interventions or levers for transformative change are fully addressed in the framework (incentives, and strengthening law and policy). It would be good for the document to explicitly name the other 3 levers that are not addressed i.e. identify that these are gaps in the framework: Cross-sectoral cooperation, Pre-emptive action, and Decision-making in context of resilience and uncertainty. In particular we believe it is a critical gap in the draft framework that cross-sectoral cooperation is not addressed. 2. Key leverage points: paragraph 122 provides commentary on four of the eight key leverage points identified in the *Global Assessment*. It would be good to explicitly state that the other four leverage points are/are not addressed, in order to make clear any gaps in the framework: ○ Visions of a good life; ○ Values and action; ○ Technology, innovation and investment; and ○ Education and knowledge generation and sharing. We suggest that the document emphasizes the importance for the GBF to fully address all of the key leverage points, in particular to fully address Externalities and tele-couplings, Inequality and Justice and inclusion.
31	123	We suggest that it would be useful to add a paragraph showing which of the key/high impacts sectors identified by the CoPs are explicitly or implicitly addressed in the framework.
31	125	Given the importance of respecting the principle of non-regression, we suggest that it would be useful to compare in this document the level of ambition of the goals and targets of the updated zero draft of the GBF with that of the relevant Aichi targets.
28	107	We recommend that the document clarifies that this para does not cover the funding needs to implement other components of the GBF and associated strategies, including the strategy for capacity building, technology transfer and scientific cooperation, and communication.
29	111	In addition to what has been elaborated in this para, information also needs to be provided to different target audiences to raise awareness on biodiversity, to make use of it in education material and other communication tools, such as social media; in that regard information must be sufficient relevant and credible ; information gaps must be constantly filled by knowledge generation and research.
29	112	We recommend that the document adds that indicators for that target should not only be focused on ‘availability’ of information, but should cover a broader range of issues, including metrics for biodiversity/nature awareness, social media information uptake, education, etc.

29	113, 114	We recommend that the document adds that TK and knowledge of IPLC are also very relevant to inform different target groups, including the broader public, decision-maker, business and others to raise awareness on the values of biodiversity associated with activities of IPLC to conserve and sustainably use biodiversity.