**Ref.: SCBD/SSSF/AS/SBG/CC/VA/**

**Notification February 25, 2020**

August 15, 2020

Dear Executive Secretary,

The undersigned organizations, Wild Heritage (USA), Griffith University (Australia) and the Australian Rainforest Conservation Society are writing in response to the notification No. 2020-053 of June 25, 2020, **Peer review of draft documents for the twenty-fourth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA 24)**. This submission is regarding the document on linkages between the post-2020 global biodiversity framework and the 2030 agenda for sustainable development.

With many thanks and best regards,

Cyril Kormos

Executive Director, Wild Heritage

Cyril@wild-heritage.org / +1 510 862 5359

  

**Template for the review of the document on linkages between the post-2020 global biodiversity framework and the 2030 agenda for sustainable development**

**TEMPLATE FOR COMMENTS**

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| --- |
| *Contact information* |
| **Surname:** | Kormos |
| **Given Name:** | Cyril |
| **Government** (if applicable)**:**  |  |
| **Organization:** | Wild Heritage |
| **Address:**  | PO Box 9451 |
| **City:** | Berkeley, California |
| **Country:** | USA |
| E-mail: | cyril@wild-heritage.org |
| ***General comments*** |
| We reiterate comments submitted regardingthe draft monitoring framework for the post-2020 global biodiversity framework here and note that the general and specific comments to the monitoring framework would also need to be reflected in the linkages document. |
| 1. Wherever forest area/cover is mentioned, reporting should be based on all three FAO forest categories: primary forest, other naturally regenerated forest and planted forest.
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| 1. As drafted, the monitoring framework assumes that certification systems such as FSC and PEFC can be used as indicators to measure biodiversity as well as climate benefits. This is inappropriate because even certified logging results in very substantial losses of biodiversity and causes significant CO2 emissions. It is therefore not an indicator of biodiversity or climate benefit or of an OECM (Other Effective Area Based Conservation Measure).
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*Comments should be sent by e-mail to* *secretariat@cbd.int* *by 25 July 2020*