

The Co-Chairs
Open-Ended Working Group on the Post 2020 Global Biodiversity Framework
Convention on Biological Diversity
413 Saint-Jacques Street, Suite 800
Montreal, Quebec, Canada
H2Y 1Ng



31 / 01/ 2020

Dear Sirs,

**COMMENTS - ZERO DRAFT OF THE GLOBAL BIODIVERSITY FRAMEWORK
(BD/WG2020/2/3)**

On behalf of ICLEI - Local Governments for Sustainability (ICLEI) we hereby wish to commend the Co-chairs on producing the Zero Draft of the Global Biodiversity Framework, which is well structured, and provides a useful, clear and concise basis for discussion and negotiation going forward.

In preparing our comments we hereby represent - in addition to consulting internally within the ICLEI network - consulted our partners,

- Regions4 in its capacity as coordinator of the Advisory Committee on Subnational Governments and Biodiversity (AC SNG) to the Convention on Biological Diversity
- the European Committee of the Regions (CoR), and
- the Group of Leading Subnational Governments to the Aichi Biodiversity Targets (GoLS).

We are particularly pleased that the Zero Draft uses a "theory of change" [section C paragraph 5], which recognizes a 'whole of government' approach and acknowledges that implementation of the Global Biodiversity Framework needs to, and will be done in partnership with all levels of government. This is an important consideration in that it captures the principle of multilevel governance.

We also welcome the ambitious, concrete 2030 action targets [section D] set out in the Zero Draft. In particular, we appreciate the reference in action target (c) 13, to integrating biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts; and in action target (b) 10 on enhancing the benefits of green spaces for health and wellbeing, especially for urban dwellers.

However, it is our view that the important role and contribution of local and subnational governments and their networks in attaining global biodiversity and societal objectives, is not adequately addressed in the Zero Draft.

For example, while the theory of change [section C paragraph 5], recognizes supporting action by the subnational levels, the Zero Draft makes it clear that the implementation of the framework will be primarily through the activities at the national level [section B, paragraph 3]. To strengthen acknowledgement of local and subnational government, we suggest the following addition to section C paragraph 7:

"... and the full and effective participation of local and subnational governments, indigenous"

ICLEI - Local Governments for Sustainability is the leading global network of over 1,500 cities, towns and regions committed to building a sustainable urban future.

By helping the ICLEI Network to become sustainable, low-carbon, ecomobile, resilient, biodiverse, resource-efficient, healthy and happy, with a green economy and smart infrastructure, we impact over 25% of the global urban population.

ICLEI- Local Governments for Sustainability

Africa Secretariat

Physical Address

Unit 1, 2nd Floor, South Tower,
Sable Park, 14 Bridge Boulevard,
Century City, 7441

Postal Address

PO Box 5319, Tygervalley, 7536
South Africa

Phone

+27 21 202 0381

E-mail

iclei-africa@iclei.org

Website

<http://www.iclei.org/africa>

Non Profit Company (NPC)

VAT No. 4400266807

Reg. No. 2002/007758/08

PBO No. 930 032 155

Furthermore, we feel that the opportunity to mainstream the essential contributions by local and subnational governments to the implementation of the GBF, has been missed. With the exception of action target (c) 13, none of the action targets refer to local and subnational governments. Local and subnational governments and their networks around the world have already taken actions and implemented policies, programmes and projects that reduce threats to biodiversity, and are perfectly positioned and aimed at meeting peoples' needs through sustainable use and benefit-sharing. We therefore make a strong call for amending the action targets to specifically address the contributions made at the local and subnational levels, particularly action targets:

- 1, on marine and terrestrial ecosystems;
- 2, on biodiversity protected areas;
- 3, on invasive alien species;
- 6, on nature-based solutions to climate change and DRR;
- 9, on enhancing nature-based solutions for clean water provisions; and
- 19, on the participation of indigenous peoples and local communities, women as well as youth.

We welcome the inclusion of local and subnational governments in the enabling conditions [section F, 14 (b), (f) and (g)]. However, we suggest that the role of local and subnational governments and their networks, notable ICLEI, Regions4 and others, also be included in the implementation support mechanisms [section E] to reflect the critical contributions to be made at these levels in ensuring effective implementation of the GBF. To enable this, it is important that the needs of local and subnational governments are taken into account in defining implementation support mechanisms, specifically in relation to

- resource mobilisation,
- capacity building,
- generating and sharing scientific information and knowledge,
- technology transfer and
- innovation relevant to the implementation of the framework.

We further want to recommend that the role and contribution of local and subnational governments in monitoring, review and reporting (section G) be specifically addressed. Given the important and very substantial contributions of these levels of government, and their networks, towards the successful implementation of the GBF it is essential that they are involved and integrated in the planning and reporting mechanisms of the GBF from the outset.

The document does not recognize local and subnational governments as governments, and that they are in many instances sovereign levels of government with their executive mandates, capacity and resources. It is our position that their role in the post-2020 global biodiversity framework, and specifically its implementation, should not be relegated to a few general references. Instead it should be mainstreamed throughout the document. On behalf of our constituency of local and subnational governments we call for **a dedicated, significantly stepped-up Decision on the role of Local and Subnational Governments in the Post 2020 Global Biodiversity Framework**, giving local and subnational governments the fullest opportunity to contribute to, and thereby ensure optimal implementation of, the new framework. Such a Decision, to build on the 10-year **Plan of Action on Subnational Governments, Cities and Other Local Authorities for Biodiversity, adopted in at COP10 in Nagoya as CBD COP Decision X/22** and which expires this year, should incorporate the following nine points:

1. Acknowledging Local and Subnational Governments as sovereign spheres of government which are essential to committing to, and implementing the Post-2020 Global Biodiversity Framework, through a "whole of government" approach that empowers transformative change on the ground at local and landscape level;
2. Committing to the unlocking of resources and upscaling of resource mobilisation to increase funding for biodiversity and nature-based solutions (NBS) at local and subnational levels;
3. Creating enabling environments for significantly increased private sector investment and development aid in nature-based solutions at local and subnational levels;
4. Ensuring that the current nature trajectory of biodiversity loss is recognized as a global priority for all, alongside the climate crisis, also within the urban context, and to support inclusive and action-oriented communication, education and public awareness (CEPA) initiatives at local and subnational levels, while reconnecting nature and people in and around our cities and regions;

5. Supporting mainstreaming mechanisms for multiple social and health benefits of nature at the local and subnational levels to improve the quality of life and resilience of communities, enhance social cohesion and unlock financial benefits and savings for both individuals and all levels of government;
6. Fostering the interconnectedness with other global agendas through applying systemic approaches to challenges that communities, cities and other subnational governments face daily;
7. Supporting of local and subnational governments in co-producing data and in gaining better access to data and scientific evidence and expertise;
8. Creating an enabling environment that ensures sustainable consumption and production patterns through the development of a circular economy that protects the environment while assuring social progress by aiming to gradually decouple growth from the consumption of non-renewable resources; and
9. Endorsing and supporting existing leading networks such as ICLEI, Regions4, and platforms such as CitiesWithNature and RegionsWithNature, a commitment and reporting mechanism sanctioned by the SCBD, where local and subnational governments can report on, and track progress against, their commitments to contributing to NBSAPS and the implementation of the new GBF; as well as other initiatives such as the European Union's Green City Accord, a comprehensive platform to better engage local governments in delivering environmental policy objectives such as in the area of nature and biodiversity, within the EU.

ICLEI is coordinating a comprehensive desktop review of the Nagoya Plan of Action, which involves input and contributions from CBD Parties, our above-mentioned partners and our broader constituency. This review will provide:

- a record of the significant milestones, projects and programmes started as result / in support of the Nagoya Plan of Action (PoA)
- the solutions and lessons learned through the PoA, and
- recommendations for what a next generation post-2020 PoA could incorporate.

We plan to present this review to the Co-chairs at an appropriate time at one of the official Post-2020 meetings ahead of COP 15.

We look forward to continuing our engagement with the Co-chairs on the development of the GBF going forward and look forward to the next version and to participate in OEWG2 in Rome next month.

Kind regards,



Kobie Brand

Global Director for Biodiversity and ICLEI's Cities Biodiversity Center
Cape Town, South Africa