**GHANA COMMENTS**

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| **Review comments on the draft monitoring framework for the post-2020 Global Biodiversity Framework** |
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| ***General Comments*** |
| The draft monitoring framework was well done and we commend the drafters for their efforts. We however have a few comments for their consideration as in the specific comments below.  |
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| ***Specific Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
| 1 | 2 | B | 25-26 | In addition to “Trends in fragmentation and quality of other marine and coastal ecosystems”, we recommend adding a monitoring element on interconnectivity of marine protected areas which is critical, for example, for the protection of highly migratory species. The WDPA may be used to assess this. |
| 1 | 3 | C | 34-35 | It could be argued that a fisheries indicator is from Goal A and specifically section A4 and A5 as well. Unsustainable and excessive fishing obviously threatens the resilience of species and their genetic diversity. The following are some recommended indicators for consideration: - Changes in the ecological health and stock abundance of fisheries- Number of fisheries where full harvest strategies have been adopted, implemented, or are in development.- Number of fisheries with sufficient observer coverage systems to address illegal and/or unsustainable harvest and to correctly estimate bycatch rates. |
| 2 | 8 | B | 1 | Correct the monitoring element that currently reads “**Trends** in area under spatial land-use plans” to say “**Increase** in area under spatial land-use plans” |
| 2 | 8 | B | 6-11 | We recommend adding trends in ecosystem integrity as a monitoring element with the following new indicator: “Ecosystem Integrity” (found within Ocean Health Index) |
| 2 | 10 | B | 26 | There is no direct mention of the sustainability of fisheries as a metric. As one moves further from the coast (where development, habitat change, pollution etc. are all potential human impacts) then overfishing and damaging fishing practices become some of the prominent ways in which the marine ecosystem is degraded. As stated under the goals section, we recommend the following relevant indicators for consideration: - Fisheries Management Effectiveness (Ocean Health Index)- Number of fisheries with precautionary science-based management plans- Changes in the ecological health and stock abundance of fisheries- Number of fisheries where full harvest strategies have been adopted, implemented, or are in development.- Number of fisheries with sufficient observer coverage systems to address illegal and/or unsustainable harvest and to correctly estimate bycatch rates.- Number of fisheries where management is based on formal stock assessments |
| 2 | 11 | C | 39-42 | Recommend adding an additional indicator under this monitoring element as follows: “Number of Protected area or OECM coverage of Ecologically or Biologically Significant Areas (EBSAs).” |
| 2 | 12 | C | 56 | We note a bycatch related monitoring element is included under Target 8, but it also belongs here if we are talking about sustainable and safe harvest. Suggest including this monitoring element here as well: “Trends in population and extinction risk in bycatch species”Another example of harvest that is unsustainable and harmful is when it uses bottom trawling, dynamite fishing. Perhaps one indicator to add here is as follows:“Increase in legislation prohibiting destructive fishing activities such as bottom trawling and dynamite fishing, etc. |
| 2 | 18 | C | 105-109 | "Sustainable fisheries management" must incorporate "ecosystem-based fisheries management". This will help insure benefits to communities from other avenues besides harvesting such as tourism or recreation.Suggest including an additional indicator here as follows: “Number of countries using ecosystem-based approaches to manage marine areas (SDG indicator 14.2.1)” |
| 2 | 33 | B  | 205-206 | Recommend editing monitoring element as follows:“Trends in development and application of public incentives that ensure biodiversity conservation and sustainable use” |
| 2 | 33 | C | 208-210 | Indicators listed are limited to agriculture and fossil fuels. These are important, but recommend also adding “forestry and fisheries”. Suggest this additional monitoring element: “Trends in the elimination and reduction of harmful fisheries subsidies under the WTO Agreement of Fisheries Subsidies” |

*Comments should be sent by e-mail to* *secretariat@cbd.int****no later than 15 August 2020****.*