TEMPLATE FOR COMMENTS

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework	
Contact information	
Surname:	Musasa
Given Name:	Monipher
Government (if applicable)**:**	
Organization:	International Fund for Animal Welfare
Address:	Area 3, European Business Centres (EBC 2 Building) Mandala Road, Plot Number 3/336
City:	Lilongwe
Country:	Malawi
E-mail:	mmusasa@ifaw.org

General Comments

IFAW welcomes the draft indicators as outlined in the monitoring framework. However, we feel that there is need to consider the translation of such indicators at national level to ensure that parties contribute to the indicator. Furthermore, the need to prioritize what aspects are required to track progress is key as we clearly can't measure everything. Therefore there is need to prioritize which elements of the state of biodiversity are comparable at international level and which elements might be more useful at national levels to ensure that parties are able to accurately report on the progress being made at national level.

The Global Strategic Plan for Biodiversity and the Aichi targets failed to provide realistic targets and indicators for genetic diversity, except for those that were focused on species of agricultural relevance. However, genetic diversity within all species not just domesticated species and their wild relatives, must be conserved and monitored using appropriate metrics. The draft-monitoring framework has managed to include all wild species; we will provide specific comments on the appropriate metrics in the space provided below.

Specific Comments

Table	**Page**	**Column letter**	**Row number**	**Comment**
1	3	B	29	The indicator used, with birds and mammal extinctions highlighted assumes that only fauna can be used to determine extinction rates. There should be other indicators that can be used to show species extinction, bearing in mind that habitat loss is also a measure of species extinction. We therefore need much deeper thought about how we can estimate the extinction rate properly to improve the science behind conservation planning.
1	4	B	36	As highlighted in the general comments, it is encouraging to see that the trends in the diversity of wild species has been included. Some of the indicators that can be used to measure it

				include; the number of populations within species with an functional population size; the proportion of populations maintained within species; the number of species and populations in which genetic diversity is being monitored using DNA based methods (https://doi.org/10.1016/j.biocon.2020.108654)
1	5	C	56	The only indicator used for trends in regulation of climate relates to forestry. Additional indicators are required for other climate regulating ecosystems, particularly marine ones. The indicators for mangroves, seagrass and saltmarshes under Goal A could all be used here too, to represent the contribution of blue carbon to climate regulation, which are on par with terrestrial forests in terms of demonstrating trends in regulation of climate. Other terrestrial indicators e.g soil carbon could also be included.
1	6	B	64	Whilst we appreciate the monitoring elements, we would like to highlight that they should be renewable biological resources to ensure the indicator does not encourage uses of biological resources that are damaging to biodiversity e.g. deforestation, monoculture plantations for biofuels.
1	6	B	68	An additional element to be measured could be trends in wildlife tourism. The World Bank 2018 report could be used as a baseline for measuring extent of wildlife tourism, see http://hdl.handle.net/10986/29417
1	6	B	74	Whilst appreciating the elements of the target, we believe that other elements that are important in the targets are not being measured in this target. The fair and equitable sharing is of particular importance and therefore appropriate indicators need to be identified that will measure fair and equitable in the target.
1	7	C	78	A proposed indicator "The proportion of financial resources coming from the private sector over the total resources dedicated to biodiversity conservation Another additional indicator could be *"Amount of resources allocated by national government directly to biodiversity conservation programs"*
2	8	C	2	The indicators proposed seem not to be related to the monitoring elements; perhaps these are related to line 3 and 4?
2	10	C	35	Does the protected areas referred in this line mean terrestrial protected areas, given that marine protected areas seem to be accounted rfo separately in row 36 below? There is need to explicitly specify if the intention in row 35 is all protected areas or only terrestrial ones.
2	11	C	39-42	Recommend adding an additional indicator under this monitoring element as follows: "Protected area or OECM coverage of Ecologically or Biologically Significant

				Areas (EBSAs)."
2	11	C	40	The indicator only measures proportion of important terrestrial and freshwater sites. Should be an indicator for marine sites as well (e.g. see comment above re: tracking trends in PA or OECM coverage of EBSAs).
2	12	B	48	The indicator used does not relate very well with the monitoring element presented in this regard. When one considers the monitoring element, it is more focused on the proportion of protected areas (either marine, freshwater, terrestrial) under various governance regimes. Furthermore, the proposed indicator on certified forestry relates to forest management, which should not be equated with protected areas.
2	12	B	55	Whilst we appreciate the need to measure reduction in human wildlife conflicts, we are of the view that this will be difficult to measure at the global level. Even though some countries keep track of human deaths because of wildlife and problem animals killed or otherwise dealt with, these are often collected locally and not sure how they can be collated to provide a global picture that significantly addresses the issue at hand.
2	12	C	59	We note a bycatch related monitoring element is included under Target 8, but it also belongs here if we are talking about sustainable harvest. Suggest including this monitoring element here as well: "*Trends in population and extinction risk in bycatch species*"
2	13	B	62	One possible indicator that could be used is "*the number of Non Detriment Findings for CITES listed species"*. However, IFAW notes that while NDFs may be in place this does not necessarily guarantee sustainability, depending on the quality of the NDF. But it at least provides for a starting point and synergistic implementation of both conventions.
2	13	B	65	"Trends in proportion of biological resources used within the established limits/quotas" is only reliable as a measure of sustainability if those limits/quotas have been set sustainably, and commensurate conservation outcomes ensue for target populations. For example, Many RFMOs and domestic fisheries set quotas far above limits recommended by scientific advisory bodies, yet such quotas would qualify under this element despite the fact they are unsustainable.
2	16	B	93	Monitoring element should be rephrased to be explicit that it relates to both terrestrial and underwater noise pollution e.g. "Trends in levels of pollution from terrestrial and underwater noise"
2	16	A	97-99	Whilst appreciating the importance of biodiversity

				(species, ecosystem and genetic) in climate change mitigation, the monitoring elements and corresponding indicators could be more explicit about certain types of habitats that make specific contributions, for example, indicators that provide for the trend in mangroves, sea grass, reefs, saltmarshes and wetlands given their contribution to climate regulation and coastal flood prevention.
2	17	C	101	Whilst we appreciate that LDCs and SIDS are the most affected by the impacts of climate change, all countries should be able to develop nationally determined contributions and long term strategies for adaptation and mitigation of climate change impacts. Unless an additional monitoring element on mitigation is added with its own standalone indicators, the current indicator must be changed to include all countries.
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	18	C	108	Proposed edits to the indicator "*MCS certified catch as a percentage of total catch*" rather than an absolute number.
2	19	C	110	Proposal to extend red list index to all marine mammals in addition to albatrosses and large petrels.
2	19	B	114	Proposal to include "*flora"* in the monitoring element, as both the target T8.2. and the indicators consider both fauna and flora.
2	33-34	C	208-2010	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 25 July 2020****.*