15 September 2019

**New Zealand response to CBD Notification 2019-075 – Comments on the structure of the post-2020 framework**

New Zealand’s comments on the structure of the post-2020 global biodiversity framework will focus on the 30 August 2019 version of the non-paper submitted by the Co-chairs of the discussion group *Possible Elements Of A Post-2020 Global Biodiversity Framework For Further Discussion*. It is our view that while further work, and in particular streamlining and prioritisation, is required, the non-paper provides a good basis for further discussion.

In addition to our more specific comments below, New Zealand's view is that the ‘higher’ levels of the framework (e.g. the rationale, any explanation of the 2050 Vision if needed, the Mission/apex target, and any high-level targets/goals) should be drafted in such a way as to be communicable and easily understood, not just by people familiar with biodiversity issues and the Convention on Biological Diversity, but by all people who will need to be reached and influenced if the new framework is to succeed. This is important for inspiring increased public engagement, global momentum and ambition. Accordingly, it is important that the top levels of the framework are not weighed down with highly technical, legal, policy or management language. Language at this level should be kept short, simple, and easy to understand.

New Zealand holds that the overall framework will need to reflect the fact that biodiversity loss impacts all three objectives of the Convention. If the drivers of biodiversity loss are not addressed, all three objectives of the Convention will be affected.

On the **rationale and scope** section of the non-paper, while the scope of the framework is important, and could be covered in the rationale, the section could be simply named “rationale” or, perhaps, something more communicable, such as “The global biodiversity crisis – an urgent existential challenge”.

New Zealand recognises that a rationale would provide a useful narrative that explains the global biodiversity crisis and contextualises the framework. New Zealand does not object to the inclusion of many of the elements reflected in 3(a)(i) to 3(a)(ix) though some amendments and additions may be required.

The rationale could include a recognition of the importance of all actors in addressing biodiversity loss, including, but not limited to, Parties, non-parties, indigenous peoples, civil society, local and regional government, private land owners, and the private sector.

There may also be a place in the rationale to address some relevant cross-cutting issues and principles.

We would be open to further additions to the rationale, but only if these are succinct and add value.

New Zealand is of the view that the **2050 Vision** remains relevant and should not be renegotiated. It is a worthy vision for 2050 and should inform our work in determining the post-2020 biodiversity framework. We are not opposed to creating a narrative around what the 2050 vision means using simpler language, but only if this narrative is not duplicative of what is already covered by the rationale and only if it is deemed necessary to enhance the overall understanding of the framework. Any articulation of the vision should be in simple languagethat is easy to understand.

The 2050 vision should be considered in its entirety, i.e. all parts of “Living in harmony with nature” where “By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people.” There are a number of interrelated and important concepts contained in the vision and they are all important. We would not wish to see any changes to the meaning of these concepts.

Any explanation of the vision should be informed by a recognition of both the intrinsic and instrumental valuesof nature.

To reiterate, many, if not all, of the above elements could be included in the rationale section, and a separate section explaining the 2050 Vision should only be included if it adds value to the overall framework.

The contents of the **2030 Mission and/or apex goal and milestones** should be inspirational and motivating. It should also be achievable. It should be short and focused. One possible way of doing this is to focus the mission/apex goal on an outcome of no more extinction and loss of ecosystems and ecosystem services by 2030.

On the **Goals, targets, sub-targets, and indicators** section, we agree that the targets should be shaped by the three objectives of the Convention 6(a)(i), the Protocols 6(a)(ii), the five direct drivers of biodiversity loss 6(a)(iv), and the conclusions of the fifth edition of the Global Biodiversity Outlook 6(a)(vii). There may be additional areas that require targets and the above should not be considered an exhaustive list.

There are a number of drivers that should be considered including, but not limited to, environmentally harmful subsidies. The amount of finance currently mobilised to support biodiversity work is outweighed by the amount spent on potentially environmentally harmful subsidies by a factor of ten. This issue needs to be addressed in the post-2020 framework.

The framework also needs to include a greater recognition of the biodiversity-climate change nexus, including an explicit acknowledgement within the targets that: climate change is a key driver of biodiversity loss and that biodiversity can play a key role in climate change mitigation and adaptation.

Issues of implementation are important enough to warrant their own section. They are also conceptually distinct from targets. We suggest the deletion of 6(a)(vi) and 6(a)(viii).

Targets could be clustered, but only if these clusters are coherent and meaningful. The Strategic Goals of the Aichi Biodiversity Targets are not worded in a way that creates impact, and as a result tend to be overlooked. A similar situation should be avoided for the post-2020 framework.

New Zealand recognises that many targets or sub-targets will most likely end up being drafted in such a way that progress towards them will contribute to a number of higher-level goals, biodiversity outcomes or objectives of the Convention.

Ensuring that the new targets are evidence-based and, wherever possible and appropriate, quantifiable will help to also ensure that they are specific, measurable, achievable, relevant, and time-bound. Some of the previous “targets” were arguably more enablers than actual targets, which meant that they have been harder to measure.

Sub-targets, i.e. stepping stones to larger, more important targets/goals, and potentially targeted to address specific responses or pressures, could be included under each target they are required for. Each sub-target should be SMART and accompanied by quantifiable and measurable indicators, where possible, and quantifiable baselines, where required.

We support the development or agreement of indicators alongside the selecting of targets. This will help ensure that the new targets have impact and are “SMART”.

The indicators should be chosen and designed to minimise the cost of measurement, by making use of existing data collected for management purposes at national level, or information that can be efficiently collected at a global scale. However, care will need to be taken to ensure that indicators are robust and useful.

Where there are issues that are better suited to consideration by other fora, then the framework should recognise that fact and, as far as possible, avoid duplication and promote efficiency and, where appropriate, synergies.

The list under **Means of implementation and enabling conditions**, could be rationalised as there are some points that are either duplicative or already covered in other areas of the structure.

As was the case for the Aichi Targets, the targets should be global ones.

New Zealand's view is that many of the issues identified in **Cross-cutting issues and approaches** are important ones that need to be included in the post-2020 framework. Mainstreaming in particular should be built-in throughout, and given direct effect by, the framework.

However, these points could be covered in other sections, such as the rationale, goals/targets/sub-targets, and means of implementation and enabling conditions. As such, in the interests of simplicity and avoiding duplication, it would make sense to delete this section and move its contents to those other areas.

On the **Transparent implementation, monitoring and reporting mechanism** section, New Zealand supports improved transparency and improved monitoring systems to support implementation of the targets. At the same time, any reporting requirements should not be overly burdensome, especially for states with limited resources.

New Zealand supports improved processes that ensure greater accountability and transparency around the actions Parties take in support of the new targets. The content of future reporting should clearly tie to the new targets and measure progress towards those targets.

A system of review that facilitates enhanced implementation efforts by Parties will be an important part of the post-2020 framework. New Zealand supports the approach outlined in Decision 14/29.

New Zealand holds that the ideas contained in the **Outreach, awareness and uptake** section could be included in the **Means of implementation and enabling conditions** section, and do not warrant their own section. Having two sections would be duplicitous and unnecessary.