Template for the review of the document on scientific and technical information to support the review of the proposed goals and targets in the updated zero draft of the post-2020 global biodiversity framework

TEMPLATE FOR COMMENTS

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General comments

Born Free welcomes document CBD/SBSTTA/24/3/Add.2, complementing CBD/SBSTTA/24/3 as well as CBD/SBSTTA/24/3Add.1 on proposed indicators and monitoring approach. We feel this supporting document provides useful information in support of the scientific and technical review of the proposed goals and targets in the updated zero draft of the post-2020 global biodiversity framework ('GBF').

We acknowledge that document CBD/SBSTTA/24/3/Add.2 contributes to filling some important gaps in the current form of the GBF, by connecting the various components of the draft framework, highlighting its strengths and weaknesses, and offering concrete recommendations based on strong recent evidence-based literature and findings.

While we recognize the tremendous work undertaken by the OEWG co-chairs to date to develop a comprehensive, coherent, ambitious yet realistic post-2020 GBF, we are concerned that both structural and substantive issues remain and believe the current draft framework does not sufficiently reflect the urgent and transformative actions needed to halt and reverse biodiversity loss by 2030.

SBSTTA-24 has a major role to play in providing sound scientific and technical knowledge to advise the post-2020 WG in the development of a strong post-2020 global biodiversity framework. We therefore encourage SBSTTA-24 delegates to provide bold and solid recommendations to rectify the situation ahead of OEWG-3 and CoP15.

Born Free would like to highlight three general persisting issues with regards both the structure and content of the updated draft of the post-2020 global biodiversity framework, followed by some more specific comments pertaining to document CBD/SBSTTA/24/3/Add.2. We will also be sharing detailed input and recommendations as regards the post-2020 global biodiversity framework in the lead up to the formal sessions of SBSTTA-24.

1. Firstly, there should be a logical flow between the 2050 goals and 2030 targets, so that we all clearly understand how our efforts to achieve the 2030 targets will contribute to the 2050 goals and the overall 2050 Vision of Living in harmony with nature. 2050 goals should help define what "Living in harmony with nature" means in a more tangible manner and should convey the much-needed sense of urgency for action. It is not currently clear how each of the proposed 2030 targets contributes to each of the 2050 goals. Further, 2030 targets do not equally address all the drivers of biodiversity loss, and are not all

actionable, translatable from global to local levels, or SMART (Specific, Measurable, Attainable, Realistic, and Time-bound). As regards indicators and the monitoring framework, Born Free provided comments on the draft monitoring framework for the post-2020 GBF in August 2020, and we hope for an opportunity as well as the flexibility to adjust the monitoring framework after the goals and targets have been further discussed at OEWG-3. We also noted with concern that some monitoring elements do not adequately match their goal/target formulation. Indicators based on science will be crucial for effective implementation of the post-2020 GBF. To facilitate implementation, we would support the identification of a smaller set of global headline indicators that comprehensively cover aspects of the goals and targets and can be disaggregated to national and local levels. These should be adopted as an Annex to the CoP15 decision on the post-2020 GBF.

2. Secondly, we believe that the lack of definition of key concepts including 'sustainability' and 'safety' hinders the common understanding of those terms and therefore undermines the potential for effective implementation of the new goals and targets by Parties and other relevant stakeholders. The concept of sustainability is central to Goal B as well as Targets 4, 8, 9 and 12. The question of how sustainability is defined and measured is hugely significant, and the term 'sustainable use' should only be applied in reference to uses which have been demonstrated to meet strict criteria for assessing biological and ecological sustainability. Ways of measuring sustainability must also be established to take into account all uses and pressures on species, and incorporate the potential societal and economic impacts of wildlife use on human and animal health.

3. Thirdly, operationalization of the framework will only be possible through multilateral partnerships and synergies across relevant actors. We encourage the development of a more structural approach building on existing processes and increasing synergies with other Multilateral Environmental Agreements (MEAs) and key partners including the WHO/OIE/FAO tripartite. Given the multiple biodiversity and health linkages and the crucial role that the CBD can play in reducing the risk of future pandemics, we strongly encourage leveraging holistic approaches such as the One Health and One Welfare approaches, as they offer strategic opportunities and solutions to address the common drivers of biodiversity loss, climate change, negative health outcomes and increased pandemics risk. Finally, the post-2020 global biodiversity framework should align with and promote use of the global action plan to mainstream biodiversity and health linkages that is currently under development as per decision 14/4.

Specific comments

Page	Paragraph	Comment
I.		RELATIONSHIP BETWEEN THE VISION AND PROPOPOSED MISSION, GOALS AND TARGETS
3	9	We would have expected a more detailed section II. *'As set out in GBO-5, a portfolio of actions would be needed involving transformative change in the management of land and oceans, and of production and consumption patterns across all sectors, particularly food and agriculture.'* – this is a selective rendition of GBO-5 findings. The portfolio of actions as set out in GBO-5 includes five elements requiring transformative change. These should be reflected here, namely 1) enhanced conservation and restoration of ecosystems; (2) climate change mitigation; (3) action on overexploitation, invasive alien species and pollution; (4) more sustainable production of goods and services, especially food; and (5) reduced consumption and waste. In addition, GBO-5 stresses the importance of implementing these actions in combination, as none of the areas of action alone, nor in partial combinations, can bend the curve of biodiversity loss.

		'*Models and scenarios suggest that this is feasible, at least for some indicators of biodiversity.*' – the second part of that sentence suggests that it is not possible to progressively reduce, halt and reverse some biodiversity declines globally by 2050. It would be beneficial to clarify which indicators of biodiversity are referred to.
3	10	We generally support the set of longer-term outcome-oriented goals but fear the 2030 milestones may lead to confusion. For the sake of simplicity and clarity, both necessary to communicate the new framework once adopted as well as avoid overlap and redundancy, components of the 2030 milestones should be incorporated into the action-oriented 2030 targets. The problematic and insufficiently ambitious 'no net loss' concept, initially part of the original zero draft of the GBF, has been deleted in the updated zero draft and should therefore not be shown in the diagram following paragraph 10. A 'no net loss' approach does not echo the multiple calls for bold, urgent and accelerated action. Biodiversity offsets typically seek 'no net loss' of biodiversity. We would like to see the avoidance on reliance on net zero and offsetting approaches and instead an emphasis on preventing further loss and enhancing existing natural systems. If we are to restore biodiversity both in quantity and quality, 'no net loss' approaches will not be sufficient.
3-4	11	We agree that the 2030 mission "*To take urgent action across society to put nature on a path to recovery for the benefit of people and planet*" highlights the urgency of action. However, it lacks in ambition and should be strengthened. A more ambitious 2030 mission could read: '*To take urgent action across society to halt and reverse biodiversity loss by 2030 and put biodiversity on a path to recovery for the benefit of planet and people.*'[i]
4	12	We strongly agree that targets should be formulated in such a way as to promote immediate action (2021) even if the target year for the result is 2030. There should be no delay in the implementation of actions, with the decade for action (2020-2030) already underway.
4	13	We would like to see the new framework address, in parallel, all drivers of biodiversity, both direct and indirect, in order to secure nature's long-term resilience and achieve the 2050 Vision of Living in harmony with nature. As it stands, the draft framework contains an imbalance in the treatment of these drivers. We encourage a much stronger commitment to tackling all forms of wildlife exploitation (including but not limited to wildlife trade and trafficking), with a clear focus on prioritizing the protection of wildlife, biodiversity and viable ecosystems as opposed to the promotion of utilization and human benefits.
4-11		
II.	INFORMATION TO SUPPORT THE SCIENTIFIC AND TECHNCIAL REVIEW OF THE PROPOSED GOALS	
Ecosystems, species and genetic diversity *Goal A -The area, connectivity and integrity of natural ecosystems increased by at least [X%] supporting healthy and resilient populations of all species while reducing the number of species that are threatened by [X%] and maintaining genetic diversity*		
5	18	Overall agree. See above comment on 'no net loss' (para 10).
5	19	*'While ecosystem restoration will be an essential part of efforts to achieve this goal, priority should be given to retaining existing natural ecosystems'* – Restoration is an essential component to scale up ambition. The post-2020 GBF should align with the

		vision set out for the UN decade on ecosystem restoration 2021-2030 (https://www.decadeonrestoration.org/). *'Net gain, or no net loss approaches, if not qualified, carry high risk of harmful outcomes […] in accounting for net changes, safeguards would be needed, for example, to ensure that any loss is replaced by the same or similar ecosystems and that critical ecosystems are not lost.'* – See above comments on para 10. *'The loss of existing intact and wilderness areas, areas with high integrity and biodiversity value, rare or vulnerable ecosystems, those essential for planetary function, and those which cannot be restored should be avoided'*. – There is a danger that we always focus on those ecosystems that we see as being of high value, while paying insufficient attention to wider ecosystems which may have less biodiversity 'value' per unit area, but that are nevertheless hugely important.
5	23	**Species** *"Maintaining the diversity of species and ensuring that populations of species are healthy are clearly indispensable to the achievement of the 2050 Vision. Further, conserving species diversity and abundance is essential for the integrity (functioning and composition) of ecosystems and directly conserves genetic diversity."* – The need for species recovery to be commensurate with ecosystem stability and functionality is a crucial aspect of Goal A.
6	25	*"To reach the 2050 Vision, it will be necessary to reduce both the extinction rate (i.e. prevent species extinctions) and the extinction risk (i.e. reduce the number of species threatened with extinction and improve the status of threatened species), as well as to maintain or improve the population abundances and the natural geographical extent of all species."*- Agree; we can't only focus on species at high risk of extinction – important to improve population abundances and natural geographic extent of all species (within the context of ecological stability/integrity).
6	26	*"plausible pathway towards the 2050 Vision is to prevent an increase in extinction rates in the coming decade and to reduce them progressively through 2050, towards being as close as possible to background levels by 2050"* – 'Prevent an increase' in the coming decade seems to lack ambition and might make it more difficult to get close to achieving 'background levels' by 2050 (and what are considered to be 'background levels'? Presumably these are no longer achievable, given the inevitability of some level of climate change, and large increases in human populations) *"However, where both the species at risk and the drivers of decline are known, extinctions can probably be avoided given sufficient political will and investment."* – 'Avoiding extinction' is not, in and of itself, a sufficiently ambitious goal – restoring viable wildlife populations within functional ecosystems is what is required.
6	27	The ecological role of species also depends on the existence of functional units, not just sufficient numbers.
7	30	*"The genetic diversity of wild species provides the variation essential to maintain ecosystem stability and ensure benefits to people, and supports species survival and adaptation, linking explicitly to ecosystems and species."* – Particularly important given other factors such as climate change, which will require adaptability both by species themselves, and in the systems designed to conserve them and their habitats (for example, understanding population shifts in response to changing climate, and how to manage this).

7	32	*"[…] current knowledge suggests a minimum of 90 per cent by 2050 would be consistent with the 2050 Vision"*- 90% of what? Current diversity? What is the baseline? And is this a minimum for all species or an average minimum?
Nature's contributions to people *Goal B - Nature's contributions to people have been valued, maintained or enhanced through conservation and sustainable use supporting global development agenda for the benefit of all*		
8	35	*'The need to maintain, and where appropriate, enhance nature's contributions to people provides a strong rationale for the conservation and sustainable use of biodiversity. They are essential elements of the 2050 Vision and underpin most of the Sustainable Development Goals.'*- First and foremost, priority should be given to reduction of exploitation and threats to biodiversity and to the active conservation and restoration of biodiversity. See UNEP's Making Peace with Nature report (2021).
8	36	*"fairly and equitably"* …and sustainably
9	40	*"Nature's capacity to continue delivering its contributions to people is reliant on the area and integrity of both natural and managed ecosystems and their constituent species and within-species genetic diversity."* … and the functional/social integrity of populations.
Fair and equitable sharing of benefits from the utilization of genetic resources *Goal C - The benefits, from the utilization of genetic resources are shared fairly and equitably*		
9	41	*"Access and benefit-sharing (ABS) also provides an important incentive for the conservation and sustainable use of biodiversity."* - See comment on para 35.
Means of implementation *Goal D - Means of implementation are available to achieve all goals and targets in the framework*		
10	46	"*will need to be implemented primarily through activities at the national or subnational levels, with supporting action at the regional and global levels"* *"However, the capacity for implementing the Convention in terms of human, technical and financial resources is limited in most countries, especially in developing countries, in particular the least developed countries and small island developing States, as well as countries with economies in transition"…*hence the need to build on existing processes. NBSAPs, revised to reflect the post-2020 GBF, are a good starting point. It is crucial that the main components of an effective implementation plan are agreed at CoP15.
10	47	*"The capacity which currently exists in countries must be further built upon so that it can be substantially increased from current levels if the post-2020 global biodiversity is to be effectively implemented …* and of course subsidies and incentives for unsustainable or harmful practices need to be phased out (covered below)..
11	48	*"Inadequate funding levels are a major impediment to effective biodiversity conservation in many countries and may be associated with failures to meet global targets"* *"Conservation investment has been shown to reduce biodiversity loss."* *"Spending on biodiversity provides a very high social return on investment"* *= "increased biodiversity resource mobilization from all sources = likely to generate net economic benefits for both present and future generations"*- See Dasgupta Review on valuation of biodiversity and global cost-benefit analyses of biodiversity policies.
11	49	"Currently more than $500 billion is spent on subsidies considered particularly harmful to biodiversity; removal of such subsidies could greatly reduce the funding need" – very important that financial including development banks and other institutions incorporate nature-friendly criteria and processes going forward.
11-30		
III. INFORMATION TO SUPPORT THE SCIENTIFIC AND TECHNCIAL REVIEWOF THE PROPOSED TARGETS		

A. Reducing threats to biodiversity		
Land-/sea-use change *Target 1. By 2030, [50%] of land and sea areas globally are under spatial planning addressing land/sea use change, retaining most of the existing intact and wilderness areas, and allow to restore [X%] of degraded freshwater, marine and terrestrial natural ecosystems and connectivity among them*		
11	51	*Target text: "retaining most of the existing intact and wilderness areas[…]"*…clarify 'most'. This needs to be quantified in some way as currently it could be considered very unambitious.
12	52	*"maintaining current production" …*but production is forecast to need to increase in line with human population growth? 'Maintaining current production' will not be sufficient to feed an increasing human population.
12	52	*"could avoid over 60 per cent of expected extinctions"…* avoiding extinctions is one thing, but restoring populations to healthy levels is another. 'Avoiding extinction' is an insufficient target – we must be about restoring healthy viable populations.
Area-based conservation measures *Target 2. By 2030, protect and conserve through well connected and effective system of protected areas and other effective area-based conservation measures at least 30 per cent of the planet with the focus on areas particularly important for biodiversity.*		
12	54	*"Currently over 16 per cent of land and about 8 per cent of oceans are covered by protected areas"…* this does not mean they are being adequately protected to prevent biodiversity decline/species loss.
12	54	*"PAs: if well-sited and designed, and managed effectively and equitably, remain essential measures to conserve biodiversity. Currently over 16per cent of land and about 8per cent of oceans are covered by protected areas registered in the World Database on Protected Areas. Aichi Biodiversity Target 11, are likely to have been met or exceeded" Moreover, many protected areas are not effectively or equitably managed"* - However, despite improvements, coverage of areas of importance to biodiversity show significant gaps.
13	55	*"Protected area and OECM coverage needs to be expanded with appropriate prioritization and management improved."* – this is really important, as well as enhancing connectivity.
13	56	*"Also, to ensure provision of ecosystem services and to maintain integrity of planetary ecological processes, natural ecosystems need to be maintained and restored beyond protected areas and biodiversity also needs to be nurtured in managed ecosystems (see proposed targets 1 and 9)"…* this is hugely important.
Active species management and Reducing human-wildlife conflict *Target 3.By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%].*		
14	59	*"species reintroductions, species recovery actions (such as vaccinations, supplementary feeding, provision of breeding sites, planting and protection of seedlings) and ex situ conservation"…* Ex situ conservation can only be a measurable intervention if it proves successful – it is not a measure in and of itself. Perhaps add something like "proportion of conservation interventions where ex situ measures are recommended, that have benefited from such measures".
14	60	**Reducing human-wildlife conflict** *"Reducing human–wildlife conflict and improving co-existence is important both to improve human health and well-being (e.g. avoiding danger, property damage, and disease transmission) and to reduce threats to wildlife, both deliberate (e.g. reprisals against large land mammals that may damage crops or threaten human life or livestock)."* – Very much agree.

		"essential element of efforts to maintain or reintroduce many keystone species and usual requires targeted management interventions"- Carefully managed reintroduction can be extremely valuable if local stakeholders are brought along; as it can otherwise be disastrous – e.g. the recent mass killing of wolves in Wisconsin.
14	61	*"difficult, at present, to determine the specific quantitative level or amount of human wildlife conflict. In order to identify such a level, it will be necessary to identify appropriate indicators of such conflict"*- We need to address the gap in post-2020 indicators to measure reduction in human-wildlife conflict. This target should include actions aimed at implementing practical solutions that develop a culture of co-existence with wildlife, and we would promote monitoring systems that address broader issues beyond providing a record of damage incidents are likely to have a greater effect in reducing human–wildlife conflicts in the long-term. Possible indicators might include the attitudes, tolerance and understanding of rural communities; their living standards and capacities; and the resilience of sustainable rural economies; as well as the implementation and success of direct actions to mitigate HWC, such as physical barriers and policy changes.
14	62	*"Human-wildlife conflict may be exacerbated by poorly planned development including encroachment into wild areas"…* particularly when it results in habitat fragmentation and loss of migratory routes or access to prey.
Reducing threats from overexploitation and unsustainable use *Target 4. By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora is legal, and safe*		
15	63	Current proposed indicators for Target 4 focus on legality, which is not a direct measure of sustainability or safety. The target suggests that if it's not illegal or unsustainable, it is therefore safe, which isn't necessarily the case. In addition, "proportion" of traded wildlife that is "legal and safe" is not only difficult to objectively ascertain, but it doesn't account for fluctuations in supply and demand, the effects of which can be dramatic on total volume of trade. Further, monitoring measures to ensure "safe" wildlife offtake and trade operations will inevitably fall short of keeping people safe. We need clear indicators measuring reductions in the commercial exploitation of wildlife that risks zoonotic disease transfer. *"Further, while broad concepts of sustainability might include safety for human and animal health inter alia, reducing the risk of future pandemics is useful for clarity."….* *"promoting sustainable use is therefore integral to achieving the 2050 Vision and the proposed Goals of the post-2020 global biodiversity framework"* - See previous comment on the need to define concepts of sustainability and safety. *"CBD also recognizes the customary sustainable use of biodiversity by indigenous peoples and local communities."…* Customary use is not necessarily sustainable. We should avoid assuming that subsistence, traditional or customary uses should automatically be considered 'sustainable' but instead look to develop clear measures of biological sustainability and seek to help cultural and social 'norms' adapt according to biological sustainability criteria.
15-16	64	*"range of actions will be required:* *a) investing in fisheries management (inclusive of distant water fleets), combatting illegal, unreported and unregulated fishing and removing harmful subsidies, could, by 2030, end overfishing, rebuild many stocks, and reduce threats to endangered species while increasing the provision of food, reducing costs and prioritizing the nutritional and livelihood needs of those most dependent on fisheries*

		b) combination of measures is needed to ensure that the supply of wild meat is sustainably and legally managed at the source; to reduce the demand for unsustainably managed and/or illegal wild meat in towns and cities, and to enable governance, while respecting customary sustainable use *c) The introduction and enforcement of stronger regulation, through national measures as well as CITES could drastically reduce the illegal and unregulated trade in endangered species and that posing particular risks for human health"* …Also see UNTOC protocol on illicit wildlife trafficking.
15-16	65	We would encourage Parties to consider inputs from Born Free and other participants in the Thematic Consultation on sustainable use that took place last year. Also see the ongoing IPBES Assessment on sustainable use of wild species, due to be finalized in 2022.
Preventing and controlling invasive alien species *Target 5. By 2030, manage, and where possible control, pathways for the introduction of invasive alien species, achieving [50%] reduction in the rate of new introductions, and control or eradicate invasive alien species to eliminate or reduce their impacts, including in at least [50%] of priority sites*		
17	68	*"Preventing = far more cost-effective than attempting to eradicate alien species once they become established* – Agree. See ongoing IPBES Assessment on Invasive Alien Species.
17	69	*"a standard Environmental Impact Classification of Alien taxa*"… presumably this 'scores' the damaging impacts of invasive species, because a measure of reduction in number of invasive species in and of itself is not necessarily a reflection of a reduction in impact on biodiversity.
Climate change mitigation and adaption *Target 7. By 2030, increase contributions to climate change mitigation adaption and disaster risk reduction from nature-based solutions and ecosystem-based approaches, ensuring resilience and minimizing any negative impacts on biodiversity.*		
19	75	*"while many ecosystem-based approaches have co-benefits for biodiversity, this is not always the case, and careful assessment of synergies and trade-offs is required"* – see comments on para 10.
Meeting people's needs through sustainable use and benefit-sharing *Target 8. By 2030, ensure benefits, including nutrition, food security, livelihoods, health and well-being, for people, especially for the most vulnerable through sustainable management of wild species of fauna and flora*		
19	76	*"Biodiversity is the source of many goods and services on which human well-being depends" "particularly important for people living in vulnerable situations" "essential to well-being"*- Agree. The post-2020 GBF needs to switch the emphasis towards promoting biodiversity protection for its intrinsic value. Also see ongoing IPBES Values assessment.
19	77	"*Wild species of flora and fauna contribute to human well-being in multiple ways. Contributions to food and nutrition are particularly important. For example, globally it is estimated that bushmeat can make up to 85per cent of protein intake of people living in or near forests while more than 30 million people are estimated to be reliant on reef-based resources to meet their food, income and livelihood needs"* – include more linkages between bushmeat and health impacts.
Sustainability of agriculture and other managed ecosystems *Target 9. By 2030, support the productivity, sustainability and <u>resilience of biodiversity in agricultural and other managed ecosystems</u> through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%]. - Change underlined wording to … "resilience of biodiversity in agriculture, food systems, fisheries and forestry".* While a multisectoral approach is needed, the framework should contain sectoral targets (on sustainable food systems, agriculture, fisheries, forestry).		

20	81	*"Most of these actions centre around the sustainable intensification of production practices*"… - Very contentious with respect to intensification of livestock production, given the massive negative impacts this can have on natural resources and biodiversity, and the difficulties making it sustainable given the need to grow food to feed livestock - let alone the negative animal welfare and human health implications. There is a need to spell out the environmental and biodiversity implications of intensive animal agriculture, alongside the welfare issues and the human health implications of increasing animal production.
20	81	*"sustainable intensification of production practices which includes improving the efficiency of use of land and inputs of water, fertilizers and pesticides, including though genetic improvements to crops and livestock, substituting external inputs, and designing or redesigning systems based on agroecological principles."* *"Other actions could include the conservation or restoration of native habitats within working landscapes of agricultural and other managed ecosystems. A recent study recommended that 20per cent of native habitat to support conservation and ecosystem services"* – Agro-environment schemes need to be promoted and leveraged.
Nature-based solutions and ecosystem services *Target 10. By 2030, ensure that, nature-based solutions and ecosystem approach contribute to regulation of air quality, hazards and extreme events and quality and quantity of water for at least [XXX million] people.*		
21	85	*"Green and blue spaces can provide important habitat for species, provide ecosystem services and help mediate extreme events, if managed with such objectives in mind."*… need to include the importance of connectivity.
B. Tools and solutions for implementation and mainstreaming		
Integration of biodiversity *Target 13. By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into assessments of environmental impacts*		
23	93	*"greater efforts to incorporate biodiversity values and considerations into sectoral policies, including policies related to development, forestry, agriculture, fisheries, energy, finance, and other economic sectors; to develop natural capital accounts; to undertake more effective strategic environmental assessments and environmental impact assessments and to further develop of tools, guidelines and methodologies to support institutions in decision-making among other things*."… It is important to emphasise that this isn't just about assigning a dollar value, it's about recognising the often intangible benefits as well (carbon sequestration value, aesthetic and cultural value, contribution to ecosystem services etc.).
23	93	*"more effective use of instruments or policy tools for addressing biodiversity and ecosystem services and functions in a comprehensive manner within and across different sectors and policy areas*"… add the importance of cross departmental consideration.
Sustainable production and supply chains *Target 14. By 2030, achieve reduction of at least [50%] in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable.* - Target 14 should therefore be strengthened, to promote just and nature-positive transitions in productive sectors. They should be supported by the wider system of finance and incentives.		
24	95	*"For example, intensive systems of timber production, such as plantations and clear cutting, may reduce species richness by 13-44 per cent while extensive forest management systems have minimal impact "...* if they are well managed with biodiversity protection as a major management consideration – many extensive forest systems have become effectively 'empty forests' because of poor management.

		"while extensive forest management systems have minimal impact"... if they are well managed.
24	95	*"More sustainable practices can be further supported through the further promotion of environmental impact assessment practices, labelling and certification schemes and/or moratoria as well as including environmental considerations in trade contracts, policies and agreements"* – need to beware of certification that does not necessarily reflect best practice from a biodiversity/ecological perspective.
Sustainable consumption *Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions*		
26	101	*"55 per cent of Parties to the Cartagena Protocol reported having fully introduced the necessary legal, administrative and other measures for the implementation of the Protocol"* – Surely the objective should be to eliminate the most harmful subsidies completely?
Incentives *Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.*		
26	102	*"Harmful incentives, including subsidies, are a major indirect driver of biodiversity, particularly as they affect decisions around land-use, consumption and production patterns, overexploitation, pollution and climate change"* *"Substantial and widespread changes to harmful incentives, will be a necessary and critical step to ensure the conservation and sustainable use of biodiversity."*- promote the rapid development and implementation of innovative financial solutions.
27	104	*"In the redirection, repurpose, reform or elimination of harmful incentives priority may be given to those particularly harmful to biodiversity and those which also impede other societal objectives or are not effective from a socio-economic perspective. A total phase out of such incentives could be envisaged"*- 'must' is more appropriate than 'could'.
Financial resources *Target 18. By 2030, increase by [X%] financial resources from all international and domestic sources, through new, additional and effective financial resources commensurate with the ambition of the goals and targets of the framework and implement the strategy for capacity-building and technology transfer and scientific cooperation to meet the needs for implementing the post-2020 global biodiversity framework*		
28	108	*"both by reducing the need for finance and through the contributions that may be made from redirected subsidies*." - what proportion of harmful subsidies would be redirected, and what proportion simply eliminated?
28	109	*"provisions of Article 20 of the Convention. A combination of resources from domestic and international sources as well as from the public and private sectors will be needed."* – need to clarify strengthen and clarify the role of business and finance. See recommendations by Business for Nature.
Knowledge *Target 19: By 2030, ensure that quality information, including traditional knowledge, is available to decision makers and public for the effective management of biodiversity through promoting awareness, education and research.*		
29	111	"Despite important advances in recent years, biodiversity information remains limited or absent for many issues." – Education and awareness-raising efforts are crucial elements of an effective post-2020 GBF.
Participation		

Target 20: By 2030, ensure equitable participation in decision-making related to biodiversity and ensure rights over relevant resources of indigenous peoples and local communities, women and girls as well as youth, in accordance with national circumstances		
29	115	*"Reaching the 2050 Vision for biodiversity will require a whole of society approach, important that the views, perspectives and experiences of all groups are taken into account in decision making processes related to biodiversity. This will require equitable participation in decision making"* *"particular attention being needed to ensure that the views and rights of indigenous peoples and local communities, women and girls,and youth"* *"Equal rights to relevant resources, particularly land, to contribute to social objectives, including poverty alleviation, health and human well-being"* – there needs to be more clarity regarding the role of each stakeholder involved in implementation of the post-2020 GBF, and how each will be held accountable.
30-31		
IV. SCOPE OF THE PROPOPOSED GOALS AND TARGETS		
31	123	*"The Biodiversity-inclusive One Health transition is partly covered through proposed targets 1, 4, 9, 10 and 11, but with no particular focus on a One Health approach"* See general comments on the need to better incorporate the health dimension into the post-2020 GBF, and to consider other holistic approaches including the One Welfare framework.
		Additional rows can be added to this table by selecting "Table" followed by "insert" and "rows below"

Comments should be sent by e-mail to secretariat@cbd.int by 22 March 2021

[i] This text is supported by the Business for Nature coalition and based on its January 2021 position on the post-2020 global biodiversity framework. See https://www.businessfornature.org/news/business-for-nature-cbd-position