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| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** |
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| ***General Comments*** |
| As requested, New Zealand is using this document to only comment on columns A to D. We are not commenting on the revised Goals and Targets. This should not be understood as endorsement or support for any of the revised Goals and Targets, or their contents. We understand that we will have an opportunity to comment on the revised Goals and Targets at OEWG III. We have restricted our comments on column A in this document to assessments as to whether column A accurately reflects the revised Goals and Targets – this should not be understood as an endorsement or support for the contents of column A, or the revised Goals and Targets. |
| ***Specific Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
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| 1 | 2 | C | 1 & 15  | It would be useful to consider biodiversity conservation as a forest management objective. Forest Resource Assessment 2020 (which the majority of Parties to the CBD already report to) has a category (3a) on designated management objectives. “Conservation of biodiversity” and “protection of soil and water” are two options for management objectives. Tracking the amount of forest managed for these objectives could be a useful application of an established international indicator. |
| 1 | 2 | C | 2 | We suggest this indicator be deleted and be replaced with the following indicator from the Forest Resource Assessment 2020:Annual forest expansion, deforestation and net changeAs a more general point, the CBD needs to engage with the collaborative partnership on forests on all forest related elements of the global biodiversity framework. |
| 1 | 2 | B | 3-4 | We suggest the following change to the monitoring element to better complement the monitoring element that immediately precedes it:Trends in area of ~~other~~ **non-forest** terrestrial ecosystems |
| 1 | 2 | B | 8-9 | We suggest that ‘Trends in area of coral reefs’ should refer to ‘live coral reefs’, as this is more relevant to monitor, as physical reefs can persist after death. |
| 1 | 2 | C | 10 | We suggest adding “Trends in Seagrass extent”, as there is the potential to complement infrequent assessments of the global extent of seagrass with more frequent assessments of trend in seagrass extent across a global network of seagrass monitoring sites. Trends in seagrass from global networks of monitoring sites is available from 1998-present through [www.seagrasswatch.org](http://www.seagrasswatch.org) and 2001 – present through [www.seagrassnet.org](http://www.seagrassnet.org). |
| 1 | 2 | C | 11 | We suggest adding “Trends in kelp extent” to column C. Annual subtidal monitoring from a global network of monitoring sites is available from Reef life Survey (RLS) and Kelp Ecosystem Ecology Network (KEEN). |
| 1 | 2 | B | 13 | The monitoring elements for wetlands is missing the “area” component included in the other ecosystem types. |
| 1 | 2 | A | 15 | Within this Component of the Goal there seems to be some confusion about the relationship between connectivity and fragmentation (column A refers to connectivity whereas column B refers to fragmentation), which are two different things. Connectivity can refer to either the physical pattern of habitat and potential connections between areas of habitat within a landscape (i.e., structural connectivity) or the movement of individual organisms through the landscape the degree to which the landscape facilitates or impedes this movement (i.e., functional connectivity). Alternatively, fragmentation refers to the process during which a large expanse of habitat is transformed into a smaller number of patches of a smaller total area isolated from each other. Consequently, one can have a good or poor connectivity in a highly fragmented landscape depending on how isolated the fragments are and the nature of the matrix between fragments. Therefore, fragmentation and connectivity are two related, but different concepts, and monitoring fragmentation is different from monitoring connectivity. We appreciate the difficulty in evaluating connectivity, especially at large spatial scales, and acknowledge that this may be why fragmentation has been used here instead, but it conveys something different to what the goal is asking.Further, fragmentation is explicitly included in the components of Target 1 in Table 2. We suggest that metrics of fragmentation would sit better there and that this section in Table 1 should be re-focused to evaluate connectivity. |
| 1 | 2 | C | 15 | We suggest there should be a monitoring element on ecosystem integrity. At present, integrity is mainly only reflected by indicators on fragmentation, though row 15 also includes a reference to ‘quality’. We suggest that integrity is given its own monitoring element, separate from fragmentation. Possible useful indicators could include: indigenous dominanceexotic species biomass |
| 1 | 2 | B, C | Between 15 and 16 | We propose a new monitoring element, to measure the integrity elements of A2:Extent of primary ecosystem loss.The relevant indicator would be:Primary ecosystem loss |
| 1 | 2 | C | 16 | We suggest the following indicator for trends in sustainability of agricultural land:Proportion of agricultural area under productive and sustainable agriculture SDG 2.4.1We note that there is a lack of indicator for the first part “Trends in farmland biodiversity”*.* We would be supportive of an indicator that appropriately tracked “trends in native biodiversity on farm/productive land”, and/or “actions or policies in place to protect or restore native biodiversity on farm/productive land.” |
| 1 | 3 | B | 23-24 | We suggest the word ‘living’ is added to the Monitoring element, so it reads: “Trends in fragmentation and quality of **living** coral reefs’. |
| 1 | 3 | C | 27-28 | An additional indicator could be added between 27 and 28:Hydrological integrity of wetlands |
| 1 | 3 | C | 25-26 | In order to ensure that coastal estuarine wetlands are included, we suggest the following addition in bold:Trends in fragmentation and quality of inland **and coastal estuarine** wetlands |
| 1 | 4 | C | 37-41 | We recommend that the FAO is consulted on this section. The FAO’s State of Biodiversity for Food and Agriculture report contains measurements and indicators that could be of use here. |
| 1 | 4 | B | 48 | Ecosystem services are not explicitly identified in GOAL A, where the focus is on natural ecosystems and healthy and resilient populations. Ecosystem services refer to the benefits that people drive from the natural system, so would fit more naturally under GOAL B, natures contribution to people. The second milestone of GOAL B explicitly refers to ecosystem services. |
| 1 | 5 | A-D |  | The draft Goal refers to “green investments”, “ecosystem service valuation in national accounts”, and “public and private sector financial disclosure”. None of these elements are included in columns A to D, and will need to be, if it is agreed that the draft Goal is to contain these elements. |
| 1 | 5 | A |  | B1 in Column A refers to climate regulation, but the redrafted Goal B does not refer to climate change. Either Goal B needs to mention climate change, or this should be removed from Column A. B1 in Column A also refers to “disaster prevention” while the milestones of Goal B refer to “resilience to natural disasters” – these are two different concepts. |
| 1 | 5-6 | A |  | Goal B refers to nature’s contribution being “valued, maintained or enhanced through conservation and sustainable use, supporting the global development agenda for the benefit of all people”. However, B.1, B.2 and B.3 do not refer to valuation, maintenance or enhancement. It would not be possible to measure achievement of Goal B using the draft components, monitoring elements and indicators. |
| 1 | 5 | B | 51-53 | “Trends in habitat creation and maintenance” does not measure B1 or what is contained in the draft Goal. We suggest deleting this monitoring element and these three rows. |
| 1 | 5 | C | 52 | Our understanding is that both the Species Habitat Index and the Biodiversity Habitat Index are terrestrially focused (see <https://geobon.org/ebvs/indicators/>); therefore, there are no marine-related indicators for Trends in habitat creation and maintenance. We would welcome suggestions of indicators that would be relevant at either a national or global scale. |
| 1 | 5 | C | 53 | Our understanding is that both the Species Habitat Index and the Biodiversity Habitat Index are terrestrially focused (see <https://geobon.org/ebvs/indicators/>); therefore, there are no marine-related indicators for Trends in habitat creation and maintenance. We would welcome suggestions of indicators that would be relevant at either a national or global scale. |
| 1 | 5 | C | 55 | There are challenges to scaling any measures of air quality to a global level as different regions have different characteristic air pollutants so need to consider distinctive air quality indicators that represent air quality regulations of that particular area.It may be worth exploring including indicators which include pollutants, as well as tree cover and deposition velocity to measure regulation of air quality and air purification. |
| 1 | 5 | B | 55-63 | The word ‘regulation’ in these proposed monitoring elements does perhaps not do a good job of referring to ‘nature’s regulating services’. ‘Trends in regulation’ sounds like it refers to human regulation. Perhaps ‘Trends in natural ecosystem regulating services in relation to X, y, z,’ might be more apt. |
| 1 | 5 | C | 56 | We suggest this indicator be deleted and replaced. The indicator as currently drafted would not capture the full scale of sustainably managed forests, as many sustainably managed forests are not certified. Measuring the number of forest areas also creates issues, as what the measure should be of is the area that is sustainably measures. The following two indicators would be acceptable substitutes: Forest area with long-term forest management plan (FRA2020 indicator)Proportion of forest area under long-term forest management plan (SDG 15.2.1 sub indicator 4) |
| 1 | 5 | C | 58 | We note that there are other ecosystems that contribute to freshwater quality beyond forests. Further to this, not all sustainably managed forests are certified as such. Finally, measuring the number of forests is less meaningful than measuring the area that these forests cover.We suggest that the current indicator be deleted and replaced with something along the lines of:Area of water-related ecosystems under conservation or sustainable management, with verified impacts on water quality |
| 1 | 5 | C | 59 | Many Parties use a combination of monitoring and modelling to determine freshwater quality state (not trends). We expect that for many Parties there is a monitoring bias in that poor-quality sites are monitored more than good quality sites, or even exclusively. If the point of these measures is to attempt to demonstrate the proportion of water bodies with good water quality at a national scale, an indicator that incorporates modelled proportions (or allows Parties to report their proportions according to their own best practice) would be more useful. |
| 1 | 5 | C | 61 | We recommend consulting with the FAO. Their Status of the world’s soil resources report (2015) contains indicators that could be of some use, including measures to track global trends in soil contamination, erosion, carbon and organic matter and acidification. |
| 1 | 5 | C | 62 | The numbers of deaths etc caused by disasters will be affected by more than just nature – e.g. better storm shelters, improvements in the healthcare system, better disaster response coordination etc are all human actions that will affect this indicator. An additional indicator is required that tracks nature’s specific contribution (though we are unclear as to whether this can actually be measured using existing methodologies and look forward to discussing this issue at SBSTTA) |
| 1 | 5 | C | 64-67 | We recommend consulting with the FAO on this section, including possible indicators. The FAO’s “*The State of the World’s Biodiversity for Food and Agriculture*” could be a basis for possible elements. |
| 1 | 6 | C | 76 | There may need to be a number of indicators for this monitoring element. We would suggest the addition of the following two indicators to especially track the “fair” and “equitable” elements of the Goal:Amount of monetary benefit received by indigenous peoples and local communities from granting access to traditional knowledge associated with genetic resources and its utilisation.Increase in the proportion of monetary benefits received by indigenous peoples and local communities from granting access to traditional knowledge associated with genetic resources and its utilisation. |
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| 2 | 8 | C | 1-2 | We suggest an additional indicator between rows 1 and 2:SDG 15.2.1 sub indicator 4:Proportion of forest area under long-term forest management plan |
| 2 | 8 | A | 1-5 | Monitoring element needs to change to reflect language in target:Trends in area under spatial planning **addressing land/sea use change** |
| 2 | 8 | C | 4 | We suggest the indicator should be “status of marine spatial planning”, using the UNESCO 7 phases of marine spatial planning, but distinguishing between underway and completed. See <http://msp.ioc-unesco.org/world-applications/status_of_msp/> |
| 2 | 8 | A | 6 | Column A specifically refers to reduction and fragmentation, however, column C only refers to (rate and change) of extent (reduction), but omits fragmentation. Suggest that fragmentation also needs to be explicitly included here. Could draw on the wording for fragmentation included in Table 1. (See also our comment against table 1, row 15.) |
| 2 | 9 | B | 13-14 | We suggest the monitoring element in relation to coral reefs should refer to “living coral reefs”. The proposed indicator in row 14 is correct in referring to “live” coral reefs. |
| 2 | 9 | B | 16 | We suggest adding “Trends in kelp extent” to column C. Annual subtidal monitoring from a global network of monitoring sites is available from Reef life Survey (RLS) and Kelp Ecosystem Ecology Network (KEEN). |
| 2 | 9 | C | 23 | We assume that Ecoregion Intactness refers to the approach outlined at this reference, although it would be good to clarify [Beyer, H.L., Venter, O., Grantham, H.S. and Watson, J.E., 2020. Substantial losses in ecoregion intactness highlight urgency of globally coordinated action. *Conservation Letters*, *13*(2), p.e12692.](https://doi.org/10.1111/conl.12692) |
| 2 | 10 | C | 26 | There isn’t a specific indicator identified here. This is worded more at the level of a Monitoring Element rather than an indicator. |
| 2 | 10 | C | 37 | We suggest this line item would sit better under T2.2. – Areas of particular importance for biodiversity are protected. It could then be merged with row 39 |
| 2 | 11 | C | 44 | We suggest that in additional to representativeness of ecoregions, the indicators could also include representativeness of species and habitats within ecoregions. |
| 2 | 12 | B, C | 51 | We suggest that the monitoring elements for ‘effectiveness’ should include ensuring that protected areas are “adequate” (eg, in terms of network and reserve size, configuration, replication, and level of protection), and also ensure “ecological viability”, eg, by allowing sufficient levels of connectivity between populations, species and habitats, and safeguarding the integrity of ecological processes. These attributes are necessary to ensure protected areas offer effective long term protection of biodiversity.We suggest that relevant monitoring elements and indicators are added to capture these effectiveness measures. For example, one indicator could be, “Trends in average and median size of all discrete areas protected and conserved,” but we would also welcome other suggestions to address ‘adequacy’ and ‘ecological viability’. |
| 2 | 12 | B |  | We suggest an additional monitoring element under this target;Trends in the number and proportion of species whose conservation status is assessed as ‘data deficient’This could be measured with the following indicators:Number of species whose conservation status is assessed as ‘data deficient’Proportion of species whose conservation status is assessed as ‘data deficient’ |
| 2 | 12 | B, C | 57-58 | We suggest that the following monitoring element be added between rows 57 and 58:Trends in enforcement to ensure the legal harvest of biological resourcesThis could be measured with the following indicators:Resources allocated to enforcement of legislation or regulation of the legal harvest of biological resourcesProportion of reported or suspected incidents of illegal harvest that are investigatedProportion of substantiated incidents of illegal harvest that lead to prosecution under relevant national legislation |
| 2 | 12-13 | C | 56-57 | Indicators 56 and 57 do not measure the full extent of the monitoring element as they do not capture the illegal harvest of terrestrial wildlife that has not being traded. An additional indicator(s) is required. |
| 2 | 13 | B | 58 | We suggest deleting the word “the” before “established harvest limits”, noting that for some species in some countries, all harvest will be illegal, and so there will not be an established harvest limit. |
| 2 | 12-14 | A, B | 56-66 | It is unclear what is meant by “safe” – does this refer to human health risks/impacts? Or is this a food safety issue? If so, the International Organization for Standardization has standards that cover this issue. |
| 2 | 13 | B & C | 56-60 | The text for T4.1. is stated as “harvest is legal, sustainable and safe for human health and biodiversity”. We suggest that an additional monitoring element be added as a separate row as the following: Trends in the emergence of zoonotic diseases from harvested wildlife. The indicators for this monitoring element could then be: Number of novel zoonotic infectious diseases in wildlife. Number of recently identified pathogens in wildlife with zoonotic potential |
| 2 | 13 | C | 58 | This indicator does not measure the full extent of the monitoring element as it only applies to the marine realm. An additional indicator(s) is required.  |
| 2 | 13 | C | 59 | We suggest the following indicators:Investment in scientific research to understand the nature and extent of the effects of different types of fishing techniques and gear use on aquatic non-target species and environments.Measures in place to monitor the nature and extent of the effects on non-target species and environments, and compliance with Parties’ fishing regulation and international commitments Use of best practice bycatch mitigation approaches and technologies.Adoption of best practice measures to limit impact of fishing on benthic environments |
| 2 | 13 | B | 62 | The drafting of this monitoring element suggests that the framework is going to create trade quotas, which we understand is not the intention. We would suggest the following amendments to clarify the purpose of this language:“Trends in proportion of **trade in** biological resources ~~traded~~ harvested within ~~the~~ established limits/quotas” |
| 2 | 14 | B | 73 | We suggest also adding the IAS asymmetry index as an indicator to highlight the imbalance of ingress/egress of IAS for a given country. See [Turbelin et al. 2016](https://doi.org/10.1111/geb.12517). |
| 2 | 14 | C | 74 | Trend data may not provide a complete picture about the comprehensiveness of policy settings and management controls. For example, if comprehensive mechanisms are in place that are working well, and there is no need for the development of new mechanisms, this will result in a zero trend, which will be indistinguishable from a zero trend where no measures being in place. Suggest column C should be related to the comprehensiveness of the responses, legislation etc rather than trends. There is a matrix for legal instruments related to AIS, as presented in [Turbelin et al. 2016](https://doi.org/10.1111/geb.12517), which could be adopted or modified here.  |
| 2 | 16 | C | 89 | It is unclear to us why eutrophication is being proposed as a measure of marine plastics.  |
| 2 | 16 | B, C |  | We suggest a new monitoring element along the lines of:Trends in levels of problematic plastic useThe following indicators could be used to measure this:Legislation, regulation, programmes and initiatives to reduce single use plasticsLegislation, regulation, programmes and initiatives to reduce unnecessary plastic packaging Reduction in subsidies for oil used in virgin plastic production |
| 2 | 16 | C | 94 | A possible indicator would be *“artificial night sky brightness”*, which measures artificial light pollution and the visibility of night skies using the world atlas of artificial sky luminance.Another possible indicator would be:Area of dark sky reserves  |
| 2 | 16 | C | 95 | Two indicators could be included here: one covering the percent of deposited fine sediment cover, and another covering some measure of turbidity. |
| 2 | 17 | C | 101 | We suggest an additional indicator relating to the prevalence of reported instances of negative biodiversity impacts from adaptation actions or infrastructure. |
| 2 | 17 | B | 102 | We suggest that the monitoring element includes a reference to inclusion of biodiversity considerations, so it would read:Trends **in inclusion of biodiversity considerations** in environmental impact assessments of mitigation, adaptation and disaster risk reduction projects |
| 2 | 17-18 | A, B, C | 103 onwards | The components, monitoring elements, and indicators do not cover the full range of what is in the draft target. The draft target mentions nature contributions to nutrition, food security, livelihoods, health and wellbeing. All of these elements should have corresponding components, monitoring elements, and indicators. The draft target also mentions the “most vulnerable”, so the monitoring framework also needs a corresponding component, monitoring element(s), and indicator(s) for this. |
| 2 | 18 | C | 105-109 | We suggest the addition of a new indicator to be added to the table somewhere in this section: Trends in levels of harmful fisheries subsidies  |
| 2 | 18 | C | 108 | While we acknowledge the usefulness of certification to provide an avenue of assurance to consumers, we are hesitant to promote a specific private entity in an intergovernmental forum. Further to this, there are cost implications to Parties/industry with using this form of certification and this might preclude certain Parties/industry from being able to certify their activities.We suggest deletion of this indicator. |
| 2 | 18 | B, C | 110-111 | We suggest that trends in population and extinction risk in bycatch has a complementary measure evaluating trends in the bycatch of at-risk and vulnerable species. For some species, especially deep-sea habitats such as corals and sponges, we don’t have a good idea of what there population sizes are, making it difficult to evaluate extinction risk. For such species, it would then be useful to have information related to bycatch, which when assessed against effort can be used to determine there appears to be changes (declines) in bycatch rates due to for example mitigation strategies or population reductions. |
| 2 | 20 | A, B, C |  | The components, monitoring elements, and indicators do not cover the full range of what is in the draft target. The draft target mentions productivity, resilience, and productivity gaps. All of these elements should have corresponding components, monitoring elements, and indicators.  |
| 2 | 20 | C | 119 | The inclusion of “conservation agriculture” is unnecessary given conservation agriculture is one of many types of agriculture that fit under the heading “sustainable agriculture, which is well covered by the well-recognised indicator in 118. We question why one specific measure be singled out, and given that it would be inefficient and impractical to attempt to list all types of sustainable agriculture, we suggest deleting this indicator. |
| 2 | 21 | C | 128 | The numbers of deaths etc caused by disasters will be affected by more than just nature – e.g. better storm shelters, improvements in the healthcare system, better disaster response coordination etc are all human actions that will affect this indicator. An additional indicator is required that tracks nature’s specific contribution (though we are unclear as to whether this can actually be measured using existing methodologies and look forward to discussing this issue at SBSTTA). |
| 2 | 21 | C | 129 | Many Parties use a combination of monitoring and modelling to determine freshwater quality state (not trends). We expect that for many Parties there is a monitoring bias in that poor-quality sites are monitored more than good quality sites, or even exclusively. If the point of these measures is to attempt to demonstrate the proportion of water bodies with good water quality at a national scale, an indicator that incorporates modelled proportions (or allows Parties to report their proportions according to their own best practice) would be more useful. |
| 2 | 21 | C | 130 | This indicator does not measure the corresponding monitoring element or component. As such, it should be deleted. |
| 2 | 22 | B | 133 | It is unclear what is meant by “trends in species that provide essential services”. We suggest that this is rephrased/defined should this item be retained.  |
| 2 | 22 | C | 135 | This indicator does not appear to measure what is contained in the monitoring element and should be deleted. |
| 2 | 24 | A |  | The draft target refers to the fair and equitable sharing of benefits. T12.2 needs to be changed to reflect this: Benefit shared **fairly and equitably** from the use of genetic resources. |
| 2 | 25 | C | 151 | We suggest the following two indicators to measure T12.3:Amount of monetary benefit received by indigenous peoples and local communities from granting access to traditional knowledge associated with genetic resources and its utilisation.Increase in the proportion of monetary benefits received by indigenous peoples and local communities from granting access to traditional knowledge associated with genetic resources and its utilisation. |
| 2 | 29 | C | 175 | The following indicators could be some of the indicators used to measure this particular element:Number of countries with legislation, regulation, programmes and initiatives to minimise the generation of wasteNumber of countries with legislation, regulation, programmes and initiatives to encourage the redesign, reduction, repurposing, reuse and recycling of resources Number of countries with legislation, regulation, programmes and initiatives to reduce single use plasticsNumber of countries with legislation, regulation, programmes and initiatives to reduce unnecessary plastic packaging  |
| 2 | 30 | C | 179 | While we acknowledge the usefulness of certification to provide an avenue of assurance to consumers, we are hesitant to promote a specific private entity in an intergovernmental forum. Further to this, there are cost implications to Parties/industry with using this form of certification and this might preclude certain Parties/industry from being able to certify their activities.We suggest deletion of this indicator. |
| 2 | 31 | D | 186 | We suggest an additional indicator be included between 186 and 187 as a measure of “Trends in use of renewable natural resources”:Change in water-use efficiency over time (SDG 6.4.1). |
| 2 | 33 | A |  | T17.1 requires amendment to ensure that it accurately reflects the proposed target:Increase in ~~positive~~ public and private economic and regulatory incentives **that are positive for biodiversity** |
| 2 | 33-34 | C | 208 | We suggest that AMS (aggregate measure of support) would be a more appropriate indicator than PSE here. PSE is limited to OECD countries, whereas AMS applies much more broadly given WTO origin. Suggested indicator:“Trends in production- and trade-distorting agricultural subsidy expenditure notified to the WTO (total Aggregate Measurement of Support).” |
| 2 | 33-34 | C |  | Under T17.2, there should be an indicator on fishing subsidies along the lines of SDG 14.6:Trends in levels of harmful fisheries subsidies This could be included between rows 210 and 211 |
| 2 | 35 | C | 216 | We are unclear as to what this indicator would measure that would not already be measured by the indicator in row 212. If they are measuring the same thing, then this indicator should be deleted. |
| 2 | 36 | C | 219 | An additional indicator is required here:Amount of funding provided from public domestic sources for implementation of the post-2020 global biodiversity frameworkSimilar wording, with appropriate changes, could also be used as indicators for rows 220 and 221 |
| 2 | 36 | C | 228 | Could be completed with “Growth in the number of records and species in the Ocean Biodiversity Information System database. See <https://obis.org/> |
| 2 | 38 | C | 238 | An additional indicator is required here:Number of countries with legislation, regulation, programmes and initiatives to protect and support the maintenance, including development where appropriate, of traditional knowledge, innovations and practices  |
| 2 | 38-39 | C |  | Two new indicators are required to measure “Trends in the participation of indigenous peoples and local communities in decision making”. These could be included between rows 239 and 240:Number of countries that consult indigenous peoples and local communities when making decisions related to biodiversity and rights over relevant resourcesExtent of protected area co-managed by indigenous peoples and local communities  |
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*Comments should be sent by e-mail to* *secretariat@cbd.int****no later than 25 July 2020****.*