

To the Secretariat of the Convention on Biological Diversity

Submission from EcoNexus regarding the Post-2020 Global Biodiversity Framework (CBD/POST2020/PREP/1/1)

This time we have decided to focus on some of the **guiding questions** put by the Secretariat. We would therefore also refer readers back to our other submissions, of August 2018 and December 2018.

A preliminary comment:

We find the term **framework** less clear than **strategic plan**. **Strategic plans** are defined as a ‘long-term vision for the future, with goals, planned projects to achieve those goals, and metrics to determine success.’

In the UNFCCC, ‘the framework sets non-binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to specify further action towards the objective of the UNFCCC’.

It is clear that in the coming decade we are going to have to make many **binding commitments** and fulfil them. **So what is intended by the use of the word framework for the CBD?**

Question: In the context of the post-2020 global biodiversity framework, what would “ambitious” specifically mean?

A truly ambitious framework would properly reflect the gravity of the biodiversity crisis we are in. Biodiversity and environmental issues must no longer be sidelined by governments in favour of economic growth. At current rates, biodiversity loss in combination with climate change could lead to the collapse of societies and the end of sustainable living conditions if both are not tackled now. The upcoming IPBES report will confirm just how serious the loss of biodiversity really is.

The post 2020 framework thus needs to signal a **step-change in ambition** from previous attempts, which have largely failed due mainly to a lack of political will. A sense of urgency is now crucial. Over the next period, from 2020-2030 and on to 2050, those who consume most resources need to lead the way in massively reducing their consumption, while at the same time those who consume least need to reach a level that can fulfill their needs. Thus there needs to be a genuine process of **contraction and convergence** that goes far beyond its original application to carbon emissions to extend to resource consumption in general.

Governments have the most profound responsibilities because they must provide enabling and legally binding frameworks for change and all sectors of society need to be reached and involved. Such frameworks should also include the impacts a country’s consumption may have beyond its borders, on the land, soil, water and biodiversity of other countries.

We also have to make it clear that if we are to tackle the climate emergency, diverse, healthy

and resilient ecosystems are essential.

Question: What, in real terms, does “living in harmony” with nature entail, what are the implications of this for the scope and content of the post-2020 global biodiversity framework and what actions are needed between now and 2050 to reach the 2050 Vision?

We are currently living a trajectory of less and less harmony with nature. We need to consult with Indigenous Peoples, local communities and peasant farmers who are still closely linked with biodiversity and work with them to see what is required of the rest of us in order to reverse this. The needs of future generations for healthy and resilient biodiversity must also be taken into account. The paradigm of economic growth and the notion of gross domestic product as measures of development are causing multiple crises and the breaching of planetary boundaries. To ‘live in harmony’ with nature sounds beautiful but is in fact a huge challenge, especially for the global north.

Question: What would be the elements and content of an actionable 2030 mission statement for the post-2020 global biodiversity framework?

- Such a statement needs to clearly set out the challenges involved in ending biodiversity destruction and how they will be addressed
- By 2020 each Party should develop clear baselines for measuring progress in ending biodiversity loss and set out what they need in order to be able to do this effectively.
- They need to avoid or minimize projects of all kinds that further fragment and destroy biodiversity in order to fulfill Article 14 of the Convention: Impact Assessment and Minimizing Adverse Impacts
- By 2030 they need to have made strong and verifiable progress in tackling biodiversity loss and ecosystem degradation
- For all this we need clear and verifiable milestones on the path to 2030.
- There also needs to be more solidarity and mutual support between Parties globally because biodiversity loss in one region has impacts for us all. (Article 5 of the Convention)
- We should return to first principles with the CBD and follow the Convention text and the Rio Declaration on Environment and Development more closely, as they contain many vital elements that have tended to become diluted over time (see also our submission for the August 2018 deadline).

Question: How should the set of targets in the post-2020 global biodiversity framework relate to existing Biodiversity Targets?

Most of the Aichi Targets have yet to be achieved. We therefore believe that new initiatives should build on the existing Aichi Biodiversity Targets rather than trying to devise a set of new targets.

However, we have proposed three additional targets that seem essential if we are to achieve the objectives of the Convention: on soil biodiversity; to protect those who defend territories

and lands rich in biodiversity; and for the protection of deep sea beds. (submission from EcoNexus for deadline of 15th December 2018)

We think there should be an analysis of why some Aichi Targets seem more difficult to achieve than others. We suspect that this may be due to the fact that some, like Target 11, can be achieved while degradation and destruction of biodiversity continues elsewhere. The achievement of many other targets primarily depends on addressing pressures from other sectors, which can at least in part be addressed through rigorously applying Aichi Target 3.

Aichi Target 3

This crucial target is currently not being implemented seriously. It must be maintained in the post2020 framework. A priority should be the identification and analysis of subsidies harmful to biodiversity in every region, if possible in every country, and this should be included in a COP15 decision. Then, perhaps as part of their NBSAPS, Parties should report on how they are reducing perverse incentives and redirecting funds. They should also report on the development of positive incentives and their impacts.

Regarding ‘subsidies harmful to biodiversity’, a few figures are a useful reminder:

Fossil fuel subsidies were calculated worldwide to be some \$373 billion in 2015, while EU fossil fuel subsidies are some \$62 billion and those of the UK alone are \$13.7 billion. We should not be subsidising industries that cause global warming and pollute the air we breathe. An ITCSD report from 2012 noted that according to the Mckinsey Global Institute ‘current global government supports on energy, water, agriculture and fisheries total more than a trillion US dollars annually.’

Cutting these subsidies and re-allocating some of the money would go a long way towards funding the biodiversity work we urgently need to factor into the post2020 process, ie awareness raising, devising new models of development, proper consultation of all sectors of society and genuine action on points arising from these deliberations.

Similar distortions are seen in agriculture, where perverse subsidies urgently need analysis and reform in order to have any prospect of addressing:

- land degradation and desertification, soil loss and destruction of soil-food-webs, dead zones due to over-fertilisation, impact of agrottoxics
- rural depopulation and displacement of Indigenous Peoples and local communities and farmers with strong local and cultural connections and traditions of *in situ* conservation and of adapting agricultural biodiversity for food production to new areas and/or conditions from which we must collectively learn.
- The destruction of agricultural biodiversity that will be vital if we are to address climate change and shift our current industrial model of production

In Europe it appears for example that Agri-environment schemes are useful, but only ‘a drop in the ocean’ compared to subsidies to industrial agriculture for practices that are damaging to biodiversity and ecosystems.

Energy, agriculture and fisheries are just three major areas affected by perverse subsidies and there are plenty more.

We propose that studies should be made on the impact of perverse subsidies, ideally for each Party to the Convention, to include how some of this money could be redistributed for biodiversity and this should be included in the post 2020 framework. However, we need to go beyond subsidies to examine the impacts of the industries that are being subsidised. A major collective effort will be required to take the necessary action as part of the transformation of our current development paradigm based on intensive energy and resource exploitation to a new one, based on low consumption of energy and resources, which must primarily target those who are consuming most. (Aichi Target 4)

Question: What form should voluntary commitments for biodiversity take and how should these relate to or be reflected in the post-2020 global biodiversity framework?

Voluntary commitments must not be used as a public relations exercise or to conceal an absence of real action. They can only be additional to the binding commitments made and cannot be proposed instead of such binding commitments.

Question: How could a post-2020 global biodiversity framework help to ensure coherence, integration and a holistic approach to biodiversity governance and what are the implications for the scope and content of the post-2020 global biodiversity framework?

Coherence, integration and a holistic approach can only be achieved if values shift at government level to make biodiversity, including agricultural biodiversity (and climate) leading priorities in policy-making at every level. For this we need **political will**. We will also have to find ways of **ensuring compliance** to commitments once they are made. This requires a process of monitoring and verifying that needs to be established under the post 2020 framework. **Monitoring compliance and deciding how address failure to comply** are two key issues that have to be addressed if the framework is to be effective.

Question: How can the post-2020 global biodiversity framework incorporate or support the mainstreaming of biodiversity across society and economies at large?

Currently mainstreaming amounts to the marginalization of biodiversity, which is seen as less important than projects (energy, mining infrastructure etc) that contribute to ‘economic growth’. We urgently need to integrate biodiversity into decision making across all government departments and throughout society. Governments must make biodiversity a top priority and empower their environmental departments so that the needs of biodiversity are stronger than the demand for mining, infrastructure, energy etc. Currently the situation is the reverse, which helps to explain the continuing and even accelerating destruction of biodiversity including agricultural biodiversity.

Biodiversity offsetting is not an acceptable practice, as one forest/area of biodiversity cannot be swapped for another and offsetting can also be used to mask the continuing destruction of biodiversity.

Seeking to **put a monetary value on biodiversity** is also not acceptable since the value of biodiversity goes far beyond money and market economics. It is essential to life even though we often seem to forget that, perhaps because it is so all-encompassing.

Question: What are the lessons learned from the implementation of the current Strategic Plan? And how can the transition from the current decade to the post-2020 framework avoid further delays in implementation and where should additional attention be focused?

The main lesson to be learned **from the implementation of the current Strategic Plan** is that it has failed because, as previously noted, biodiversity is not treated as a priority by governments. Climate is given slightly more prominence, but both need to be given top priority by governments for the post2020 framework, **especially as resilient ecosystems provide the best possible buffer to inevitable continuing disruption from climate change**. The question is how can we generate the sense of urgency and political will to make this happen?

The critical importance of agriculture for the post-2020 biodiversity framework

We believe that agriculture should be the focus of more attention in the CBD. The UNCCD Global Land Outlook of 2017 shows clearly the multiple negative impacts of our current agriculture and food systems on land, biodiversity, climate and livelihoods (page 10-11 for key messages). We have to work urgently to address this and the CBD must prioritise these issues in the post-2020 framework. The FAO report on the state of the world's biodiversity for food and agriculture also has important messages. We already produce enough food for projected future populations; but much is wasted or not fairly distributed. It is true that some of these issues lie outside the remit of the CBD, but that probably means that we need more cooperation between those bodies tackling agricultural issues. The CBD's focus on biodiversity including agricultural biodiversity and also cultural diversity gives it a unique and vital place in these discussions.

Regarding our food systems: agroecological approaches based on in situ conservation of agricultural biodiversity must be made a priority in the post 2020 framework. We have proposed adding to existing targets for this and also proposed a new target for **soil quality** in our submission of 15th December 2018. We urgently need to change our food systems globally for the sake of environmental and human health as well as to tackle climate change. Agroecology offers the possibility of producing nutritious food without the use of agrottoxics, finding better ways, eg: to address pests by working with beneficial predators and rebuilding soils at the same time, alongside providing dignified livelihoods to more people. We must remember that healthy plants are more resistant to disease than plants that are stressed by poor soil quality and chemicals. Healthy plants build healthy animals and people.

However, rural depopulation is currently a major problem in many regions and it must be reversed. Effective rural infrastructure, support for small farms and peasant farmers and access to land and the recognition of land rights would help to stem the flow to cities. We also need shorter food chains. Industrial agriculture has driven many of the small farmers who still feed most of us off the land, to be replaced by monocultures requiring very few people, whereas a small diverse farm of 3 ha can provide work for several people.

IPLCs obviously have a key role to play in all this and must be central to any processes developed.

Almost all the Aichi targets are relevant for agriculture/food systems and must be reflected in any new framework.

Question: How can the effectiveness and implementation of the NBSAPs be strengthened, what additional mechanisms or tools, if any, are required to support implementation of the post-2020 global biodiversity framework and how should these be reflected in the framework?

NBSAPs are currently hard to assess and compare. **Common criteria, frameworks and compliance mechanisms should be developed and** applied by all Parties so that they can be better assessed on their effectiveness. Resources need to be devoted both to assessing NBSAPs and then working with Parties to revise, improve and successfully implement them. They must include the wider society (IPLCs, women, youth, civil society, etc) in their establishment and implementation.

Without common frameworks and good assessment, it will be very difficult to monitor progress in addressing biodiversity degradation and loss either at national or global level. **For all this a review process is necessary and should be established as part of the post-2020 framework.**

Question: What are the issues associated with biosafety under the Convention and what are the implications for the post-2020 global biodiversity framework?

Biosafety must be included in the post-2020 global biodiversity framework, especially since at times of crisis (the biodiversity and climate emergency) technological solutions are all too often promoted as the answer. When they ignore root causes and the interactive complexities of biological, ecological, and cultural systems, technological 'solutions' have the sad track record of either deepening the problem, creating new problems or shifting the symptoms elsewhere. The strongly promoted and intensive application of pesticides to monoculture crops is just one example, with detrimental consequences for biodiversity, resilience and ultimately the productivity of farming systems. It is important to learn from history.

We have all heard the claim that genetic modification is needed to feed the world, and gene drives to fight agricultural pests or to protect biodiversity, and it is likely that the promotion of new applications and developments in modern biotechnology will further intensify as the crisis deepens.

Thus it is a priority to have both a **process and the capacity necessary for horizon scanning and also a process for developing CBD/biodiversity specific guidance for risk assessment and risk management** (including using online forums and AHTEGs)

Additionally it will be crucial to be able to ascertain if claims made for novel technologies, techniques or applications are justified and can bring the benefits projected, and also if there

are alternative approaches, practices or appropriate technologies that can safely address either the underlying problems or the specifics. These include approaches such as increasing agricultural diversity and beneficial insects and micro-organisms for enhancing resilience and, where required, productivity. Whilst the latter aspect is not directly a CPB issue it is strongly linked – especially as it addresses the issue of “need”, ie whether there is a need for the applications of modern biotechnology proposed to address the problem

All this requires **a good, up-to-date and easy to use website**, and the people necessary to carry out these tasks. It also requires a dedicated biosafety team with sufficient capacity assigned to the work required. **This must include the Biosafety Clearing House website (BCH)**, which also requires its own funding to collect the information and stay up-to-date with all the different products. A database should be developed where Parties can go and find out about new developments that could affect their biodiversity. All genome edited organisms should be registered with the BCH.

Furthermore, all aspects of the biosafety work as set out in the 2011-20 CPB strategic plan that are still relevant need to be included in the post-2020 framework.

There must be a close link between the CPB and CBD on synthetic biology – and insofar as synbio products are LMOs, the CPB needs to address them, especially gene drives, alongside them being addressed by the CBD.

Finally, there is not enough reference to the Protocols to the CBD in the post-2020 framework so far. The strength of the CBD is undermined if its protocols are not well supported.

Question: What are the issues associated with access and benefit-sharing under the Convention and what are the implications for the post-2020 global biodiversity framework?

Here digital sequence information (DSI) is one major problem yet to be resolved. Parties calling for easy access to DSI, claiming that this is in the interests of research, need to understand that ABS is a fundamental requirement under the second and third pillars of the Convention and the Nagoya Protocol. However this may be resolved prior to 2020, it is bound to be an important issue for the post 2020 framework and vital for IPLCs.

Question: How can the post-2020 global biodiversity framework facilitate the involvement of indigenous peoples and local communities and support the integration of traditional knowledge as a cross-cutting issue?

IPLCs must be central to the post2020 global biodiversity framework because they have insights and approaches that can help all of us to address biodiversity loss and find ways into the future for human development that do not compromise biodiversity. Many also have methods of inclusive community consultation that we could all learn from.

Traditional knowledge has played a vital role in human societies to date and is crucial to all our futures. Here **Aichi Target 18** is of critical importance, relevant to all the other targets and their implementation. All these points must be prioritised in the post 2020 framework.

Questions relating to how issues relating to gender, women, youth, civil society, IPLCs, subnational governments, cities and other local authorities can be reflected in the scope and content of the post-2020 global biodiversity framework and how their involvement can be facilitated

We need the involvement of all these sectors of society. This means that a priority for post 2020 is to develop processes that are genuinely participatory, truly inclusive and that and also involve ongoing, genuine consultation.

Citizen assemblies on biodiversity issues

We have worked on public dialogues, including the UK's Synthetic Biology Dialogue and also GM Nation, which, although not perfect, showed clearly how wise members of the public can be when given access to good information, the opportunity to question key people such as regulators and time to deliberate. We **believe that the post 2020 framework should contain provisions for Parties to establish citizen assemblies** as a priority to discuss how to respond effectively to the biodiversity crisis in their particular region or country. These could be an excellent way to facilitate the involvement of the wider society.

However, they must not replace any processes already in place, for example those established by Indigenous Peoples and ICCAs, "**territories and areas conserved by indigenous peoples and local communities**" or "**territories of life**". These already have their own governance structures and processes. In fact there is much that the rest of society could learn from them. It is possible therefore that citizen assemblies will be most relevant in the global north and in urban areas.

Citizen assemblies in brief:

- A citizens' assembly is formed of a quasi-random selection of citizens from a country, region, or city
- They can be selected to represent or weighted towards particular groups where appropriate, eg: women, youth, IPLCs
- They may meet for one weekend a month for a year, or every weekend for a few months – or just a few times
- They provide answers to selected questions through discussion
- They can also call for information and experts to question
- They typically go through three phases: learning; consultation; deliberation and discussion.
- They will usually make recommendations at the end of this phase
- Their proposals may then be put to a referendum, but this is not essential.

Question: How should issues related to the engagement of the private sector be reflected in the scope and content of the post-2020 global biodiversity framework?

The private sector's role in the CBD must now be recognized as different from that of other sectors or major groups because currently the notions of economic growth, profit maximization and the concept of GDP, central to their development, are working strongly against living in harmony with nature. We urgently need to end the degradation, fragmentation and destruction of biodiversity and ecosystems, and that means **cancelling**

projects for resource exploitation and infrastructure development where they compromise biodiversity. All sectors need to be able to contribute to the major shift that is required to new kinds of economic model that are not based on economic growth, profit maximization and GDP values. This is a huge challenge for humanity, especially since the global north has benefited for centuries from the exploitation of the global south at huge cost to all in terms of biodiversity destruction, climate forcing and the creation of mountains of 'waste' materials leading to widespread pollution of soil, water and air. Now the global south must be assisted to meet the challenge of finding ways to avoid following this trajectory, while the global north must reduce their own footprint and assist in the development and implementation of new models of development that embrace contraction and convergence.

Question: How should the post-2020 global biodiversity framework reflect diverse and multiple perspectives?

This requires consultation with all the different sectors: women, youth, civil society, IPLCs, subnational governments, cities and other local authorities etc. Ongoing consultation must be an important component of the post-2020 framework.

Question: How should the post-2020 global biodiversity framework address issues related to communication and awareness and how can the next two years be used to enhance and support the communication strategy adopted at the thirteenth meeting of the Conference of the Parties to the Convention on Biological Diversity to ensure an appropriate level of awareness?

We should beware of using the term nature rather than biodiversity / biological diversity, as has been proposed by some. Instead we need to work harder to convey the meaning of the terms biodiversity / biological diversity to the public at large and help them to engage with and identify with biodiversity. It is also important that people should better understand the meaning of ecosystems and ecosystem functions and services. However, one problem with the word 'services' is that it helps to foster the illusion that biodiversity exists to serve people primarily.

A problem with the words environment and nature is that both can imply that humans are somehow separate from biodiversity. This has helped us to overlook our (at first inadvertent) impact on planetary ecosystems, which characterizes the definition of the Anthropocene epoch. This has now developed into the idea that we can manipulate the planet to serve our interests and overcome or counter the negative impacts of our current model of development with new technologies that will also enable continued 'economic growth'. This is very dangerous, especially considering that our understanding of how biodiversity and ecosystems function at every level is still in its infancy.

We need to shift perceptions so that **people see themselves as part of biodiversity, not separate from it but intimately reliant upon it, connected to and interactive with other species. The post 2020 framework should therefore contain projects for developing materials and activities to achieve this.**

In Decision CBD/COP/DEC/XIII/22: the paragraphs in the Annex: 13, 42 and 71 referring to business are too weak in view of the multiple crises we face. For far too long, much of the business sector has failed to respond to persuasion and encouragement and we now need stronger action.

We also worry about a tendency to see the UNFCCC Paris agreement as some kind of triumph, indeed the idea of a 'Paris moment' in Beijing has been mentioned by some. However, this is not a public relations exercise we are involved in here and Paris has not proved itself yet, so we should beware of such comparisons.