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

1. Document SBSTTA/24/3/Add.2 is useful in establishing the scientific backdrop behind the proposed goals, targets and indicators of the post-2020 GBF. Acknowledging the importance of addressing the post-2020 GBF along with their monitoring, we submit our comments in conjunction with those related to the proposed indicators. We hope that the scientific and technical underpinnings of the proposed indicators to goals and targets will also be made available, as separate additional documents (e.g. such as CBD/SBSTTA/24/3/Add.2).

2. We believe that headline indicators, in particular, should be set in order to attract political attention to biodiversity issues, as well as to enable monitoring progress of the post-2020 GBF at the global level. Scientific rationales for the indicators together with their baseline data, including the information written in the addendum document, will be crucial in that regard. Furthermore, headline indicators should be narrowed down toward issues that: 1) should be addressed through all Party's combined efforts on a global scale; and 2) issues of which the level of ambition should be raised through applying ratcheting-up mechanism to each Party's national targets in case, when progress is deemed inadequate.

In doing so, we hope that the headline indicators will be improved in synch with more scientific information.

We think that indicators for the following issues in the current draft documents meet the criteria mentioned above; i.e., the number of endangered species, percentage of land covered by landscape scale land-use plans the area of protected areas, invasive alien species, (possibly) the percentage of benefits allocated for conservation and sustainable use of biodiversity from the utilization of genetic resources, negative impacts from supply chains, reduction of harmful subsidies.

For your reference, we submit an attachment which illustrates our view.

3. Since the proposed headline indicators include indicators from relevant international organizations, it is important to clarify the organizational source of that data (i.e. which organization the data come from). If countries opt to use headline indicators measured by the international organizations for their national reports, expected roles for each party (e.g. whether the party should submit their national data to specific international organizations or not) should be clarified in the suggested recommendation of Item 3 of SBSTTA24 or elsewhere (e.g., CBD/SBSTTA/24/3/Add.2).

4. Meanwhile, component indicators should be set for all the goals and targets in order to monitor the progress of all the targets, including those goals and targets that do not have headline indicators under the condition written above. The number of the indicators should be minimized (1-2 indicators for one target, or 3-4 maximum) to the minimum necessary to track the progress of each target. Component indicators should be used in the national reports of each Party in light of the lessons learned from GBO5. In this regard, the scientific and technical review on relevant information (on CBD/SBSTTA/24/3/Add.2) could also be revised in the future through the lens of updated headline and component indicators.

5. The purpose of complimentary indicators is to ensure each Party's flexible use of the indicators. Therefore, they should be used as reference information, but need not to be included in the monitoring framework, in order to make the framework simple. In this regard, additional documents, such as CBD/SBSTTA/24/3/Add.2, could accommodate such complimentary indicators as well.

6. Some of the newly proposed indicators reflect the outcomes of the efforts before and after the adoption of the Aichi Targets. Hence, when setting a reference year/ period, flexible responses, such as using a year or a period other than 2020 or 2016-2020 as a reference year/period, would be needed. For example, target 14 cannot be reviewed without monitoring the changes of two periods; one is a period 2000-2020, and the other is 2020-2030. It is because measures that affects the patterns of production and of consumption in relation to ecosystem restoration have implemented since 2020 or earlier. Therefore reference/period should be noted in the addendum document.

7. Overall, this document is rich in scientific and technical information by taking into account the IPBES' global report and other relevant publications. Likewise, when considering a new technical expert group on indicators, existing frameworks, including IPBES and BIP, could be useful. In other words, we should

consider what the new group should work among the relevant frameworks with comparison of estimated cost and possible tasks between establishing the new group and making use of existing frameworks.		
Specific comments		
Page	Paragraph	Comment
4-7	14-33	【Goal A】 1. While the area, connectivity and integrity are significant elements for ensuring the health of ecosystems, it is not reasonable to set one numerical target for these three elements in integrated manner from the viewpoint of accurate measuring. 2. 2030 milestones (i) has some inadequacies in its measuring method and indicators. Therefore, additional documents could mention its relevance to the proposed milestone. 3. A target for endangered species is important in terms of avoiding irreversible impacts on biodiversity. However, 2030 Milestones (ii) would not be able to grasp population of all species, and further consideration on the meaning of average value of population growth of some species will be needed. We think that measuring the average value of population growth of key stone species or umbrella species could be an example. 4. We do support for inclusion of genetic diversity into Goal A, as highlighted in the document of CBD/SBSTTA/24/3/Add.2. In this respect, the indicator of A.0.5 (the proportion of populations maintained within species) should be interpreted as "the proportion of ***distinct*** populations maintained within species ("distinct" is missing.)". Please refer to the following paper: Hoban, et al. (2020). Genetic diversity targets and indicators in the CBD post-2020 Global Biodiversity Framework must be improved. Biological conservation, Volume 248. https://doi.org/10.1016/j.biocon.2020.108654. 5. As highlighted in the document of CBD/SBSTTA/24/3/Add.2, ensuring global connectivity and integrity is important. Besides, maintaining the diversity of species, including endangered species, is important. The number of endangered species can also be used globally as a common indicator enabling add up the amount of efforts globally. Hence, such a number can be one of the headline indicators of Goal A, and its current data could be added to the addendum document for reference.
7-9	34-40	【Goal B】 1. We propose following amendments to the 2030 Milestone (i) of Goal B for the reasons written below. "(i) Nature contributes to the sustainable diets and food security, climate change measures, access to safe drinking water and resilience to natural disasters for all ~~at least [X%] million~~ people." 2. As explained in the document of CBD/SBSTTA/24/3/Add.2, Nature's Contributions to People includes climate regulating service. Furthermore, this service (contribution to the mitigation and adaptation for climate change) is the element of T7 and the T10. 3. Taking into account the principle of SDGs No one left behind, "at least [X] million people" in the 2030 Milestones (i) should be replaced by "all people." 4. It is difficult to measure progress of Goal B with the two proposed headline indicators. In this regard, if the indicators are retained in the framework, the document of CBD/SBSTTA/24/3/Add.2 should explicitly mention the current data of the two proposed indicators in the first place.
9-10	41-45	【Goal C】 1. What is important in the context of Goal C is not the increase of benefits itself, but the implementation of fair and equitable benefit sharing, and the subsequent promotion of the conservation and sustainable use of biodiversity. The document of CBD/SBSTTA/24/3/Add.2 mentioned that 27 Parties have reported having received benefits from granting access to genetic resources and/or associated traditional knowledge for their utilization and that some of those benefits are contributing to the conservation and sustainable use of biodiversity. However, this part should be more precisely elaborated, including how many parties allocated the benefits to purposes other than the conservation and sustainable use of biodiversity, and to what extent. 2. We are against the setting of numerical targets on benefit sharing which, in any case, is impossible to quantify.

		As mentioned in paragraph 42 of the addendum document, benefit-sharing should be based on MAT individually and the amount of benefits shared is confidential information. Hence, it is not possible to collect and monitor this information legally. As an alternative, we suggest monitoring the proportion of the benefits that were actually allocated for the conservation and sustainable use of biodiversity among all the shared benefits. Such data could be gathered, upon consent of the parties to the contract, regardless of the substance of the MAT. As such, we propose to revise the indicator of C.0.1 as follows: "C.0.1 Proportion ~~Amount~~ of ~~monetary~~ benefits ~~(in United States dollars)~~ allocated for conservation and sustainable use of biodiversity in the overall benefits received by countries from utilization of genetic resources as a result of an ABS agreement, including associated traditional knowledge" Likewise, if possible, the addendum document should show such data (over the last decade) for reference; 3. If 2030 milestones (ii) is revised as we are proposing above in 3., benefit sharing will promote the conservation and sustainable use of biodiversity. Taking into account the fact that the three objectives of the Convention can be implemented in an integrated manner, adding up the amount of such efforts globally will have significance. 4. Re: paragraph 43 of the addendum document ("monetary benefit sharing is likely a very small proportion of the total revenues of the relevant sectors"): Unless the document can show any quantitative data on the benefits shared through ABS, the observation of "it is likely a very small proportion" is highly subjective, and should be revised to be more objective. Moreover, considering the tremendous costs associated with the access and use of genetic resources, the shared benefits should be based on net profit linked to the access to genetic resources, rather than gross revenues.
10-11	46-50	【Goal D】 1. The addendum document is focusing on financial resources, while it does not mention efficiency and effectiveness of utilization of available resources, which is one of the three important components of resource mobilization. Therefore, current situation from this perspective should be added to the document. 2. Furthermore, other means of implementation should also be considered. For instance, ensuring participation of all entities in the implementation of the post-2020 GBF is another major premise. From this stand point, we propose to add mainstreaming biodiversity in every stakeholder in Goal D. Simultaneously, related information on such a premise could be added to CBD/SBSTTA/24/3/Add.2. Goal D Means of implementation, including necessary biodiversity mainstreaming, are available to achieve all goals and targets in the framework. 3. In this regard, we propose the follows as an component indicator; "The number or proportion of countries, local governments, private companies and citizens conducting continuous activities with consideration for biodiversity"
11-12	51-53	【Target 1 】 1. As indicated in the paragraph 53 of the addendum document, the landscape scale land-use plans are important, therefore coordination of land use among stakeholders at levels such as local government level could become a crucial element. The proposed indicators are appropriate. 2. Connectivity and integrity of ecosystems is an issue highly dependent on regional features, hence it should be addressed by each Party individually. On the other hand, ensuring global connectivity and integrity is a significant viewpoint, therefore it should be subject to ratcheting up. 3. In order to measure the element mentioned in the 1. above, we propose below as complementary indicators; -Number of countries applying landscape approaches to NBSAPs - Number of countries implementing measures on landscape approaches at a national level
12-13	54-56	【Target 2 】

		1. It is important to increase area where ecosystems are “effectively” conserved. “Effective management” and “connectivity” should be mentioned in the addendum document and targets. 2. Target 2 should be subject to ratcheting up. This is because target 2 is related to Goal A and has a high-profile globally, is articulated in simple and clear language, and the same unit can be used globally. Those features could attach meaning to adding up the amount of the efforts globally. 3. Headline indicators should be set to measure not only the protected areas but also OECMs. 4. There are some inconsistencies between proposed 2.0.2 and the target, hence, it should be removed from the list. In this regard, if this indicator is retained in the framework, the document of CBD/SBSTTA/24/3/Add.2 should explicitly mention its relevance to the target in the first place. Moreover, if protected areas management effectiveness proposed as a headline indicator 3.0.1 of T3 can be evaluated, it should be used as an indicator for T2.
13-14	57-62	【Target 3】 1. The headline indicator are inconsistent with the target. In this regard, if this indicator is retained in the framework, the document of CBD/SBSTTA/24/3/Add.2 should explicitly mention its relevance to the target in the first place. The 3.0.1 headline indicator focuses on protected areas, thus, it should be moved to T2’s indicator.
14	62	【Target 3】 1. Regarding human-wildlife conflict, adding complimentary indicators which relate to planning of development and control measures is appropriate in line with para 62 of the addendum document.
15-16	63-65	【Target 4】 1. Conservation of endangered species, which is indicated in the addendum document, cannot be measured by the proposed headline indicator 4.0.1 “proportion of legal trade”. Therefore it should be revised as “proportion of wildlife trade management effectiveness”. 2. Component indicator 4.1.1 and 4.1.3 require rewriting, since 4.1.1 is almost the same as 4.1.3. Accordingly, the component indicator 4.1.1 should be integrated into 4.1.3 because 4.1.3 is also used in SDGs. A measurable indicator should be considered, taking into account the status of the review of indicators under the SDGs (15.7.1 and 15.c.1). 3. Complementary indicator 4.1.1.4 (Marine Stewardship Council Fish catch) that only focuses on MSC certification is insufficient. Therefore, other certification schemes recognized by GSSI also should be included. 4. It is in contradiction with reality to use “total catch of cetaceans under the ICRW” as an indicator to determine these catch are “legal, at sustainable levels and safe,” since, without taking into account scientific evidences including stock statuses, a so-called moratorium on commercial whaling adopted by IWC has been generally prohibiting the catch of large whales. Hence, the complementary indicator 4.1.1.5 has to be removed from the list.
16-17	66-70	【Target 5】 1. In Japan, fire ants infestations have been ongoing since 2017. They are often found in sea containers containing industrial products, rather than plants, wood, etc. CBD/SBSTTA/24/3/Add.2 should take such events into account, and should identify and describe the introduction pathways of invasive alien species, including both intentional and unintentional ones. 2. We propose amendment of the target as follows. Refer to 2-3 below for the reasons; ”By 2030, manage, and where possible control, pathways for the introduction of invasive alien species by strengthening international collaboration, achieving [50%] reduction in the rate of new ~~introductions~~ establishments, and control or eradicate invasive alien species to eliminate or reduce their impacts, including in at least [50%] of priority sites.” 3. Global cooperation is crucial to address unintentional IAS that are introduced through the flow of goods. For enhancing effectiveness, control by countries that are origins of the IAS is significant, and international cooperation is needed. Thus, ratcheting up mechanism should apply to T5.

		4. It is difficult to track an “introduction” because it is a one-time event. In addition, it is difficult to achieve the target with the efforts of those countries where IAS are introduced alone. When setting a numerical target, it is easier to set a target which assesses “establishment” rather than “introduction”. Even in this case, the accuracy of “establishment” data varies widely between countries. Hence, we suggest the rate of establishment, rather than the rate of introduction, to be included when setting a numerical target. 5. Taking into account international cooperation, we propose revising the component indicator 5.1.2 as follows; ”5.1.2. An established alert and management system including international collaboration for prevention and control of IAS”
17-18	71-72	【Target 6 】 1. We propose following amendments to the Target 6 with following reasons described in 2~5. By 2030, reduce pollution from all sources, including reducing excess nutrients ~~[by x%]~~, pesticide ~~biocides [by x%]~~, plastic waste ~~[by x%]~~ to levels that are not harmful to biodiversity and ecosystem functions and human health. 2. While appreciating the current proposal indicates “all sources,” we believe that post-2020 framework aims not to reduce usage of fertilizes or related materials in a uniform manner. Our aim is to reduce the pollution to the “appropriate levels” of their usage taking into account the management of emissions and carrying capacity of environment. 3. Especially, uniform and numerical reduction target is inappropriate to set, because it is almost impossible to measure the quantifiable goals of excess nutrient and this issue includes high regionality. Lower bound of them is also important as the oligotrophication may become a problem as well as eutrophication. 4. With regards to “biocide,” it is not realistic to establish a unified measure to be applied to all countries, since there is no internationally agreed definition for the term. In addition, legal frameworks to manage chemical substances are different in each Party. 5. Sustainable and responsible use of pesticides is one of the most effective measures for pest management, which is essential for sustainable food supply and does contribute to achieve SDG 2 (zero hunger). However, considering the diversity of geography, climate and crops grown in each Party, the amount of pesticides that can be reduced, while not sacrificing production, is different in each country. Therefore, Japan is of the view that [by XX%] in the text should be deleted because actual target should be set in each country according to its conditions. Any unified target which aims at simple reduction of the amount of pesticide use is unrealistic and inappropriate. 6. We propose the following amendment to the Headline Indicator 6.0.3, replacing the simple pesticide use with “highly-hazardous pesticides.” As the impact of pesticides to environment and human health differs by the types of those, the indicator should aim at reducing the impact from the toxicity of pesticides, which is evaluated in each country. FAO-WHO list of “highly-hazardous pesticides” (HHPs) is well known, and it can be utilized by many countries. 6.0.3 Highly Hazardous Pesticides (HHPs) use per area of cropland 7. We propose the following amendment to the Component of the Target, in line with the Target description mentioned above. “6.2 Reduction of pollution from ~~biocides~~ pesticides “ 8. With regards to the Component indicator 6.1.1.3, we propose the following amendment pointing out that fertilizer use is just one of the sources of excess nutrients and we have to consider other sources that may cause pollution. “6.1.1.3 ~~Fertilizer use~~ Nutrients loading from all sources” 9. Regarding marine plastic waste, concrete numerical value should not be set in the target because scientific evidence on ”levels that are not harmful to biodiversity and ecosystem functions and human health” is insufficient. The wording “Plastic waste endangers marine animals, among other impacts” in the paragraph 71 in the Add.2 should be replaced by “Plastic waste ~~endangers marine mammals, among other impacts~~ causes adverse impacts on marine ecosystems”.

		10. The proposed target on plastic waste does not articulate whether “plastic waste” refers to the total amount of plastic waste or the amount of mismanaged plastic. Hence, the definition should be clarified in additional documents, such as CBD/SBSTTA/24/3/Add.2. Furthermore, we think that a target/indicator that can reflect not only the reduction of plastic waste but the efforts of using an alternative plastic should be set. 11. We propose to delete “by cities” or replacing it with “by nation” in the headline indicator 6.0.4, since municipal solid waste would require a nationwide effort.
18-19	73-75	【Target 7】 1. From the viewpoint of solving social issues by nature-based solutions and ecosystem-based approaches, it should be categorized into “Meeting people’s needs.” We suggest merging T7 into T10, which is dealing with the similar content to the category mentioned above. 2. The proposed headline indicator does not have clear definition and cannot be measured. If this indicator is retained in the framework, the document of CBD/SBSTTA/24/3/Add.2 should explicitly mention its relevance to the target in the first place.
19	76-79	【Target 8】 1. While T8 addresses access to biological resources by people, both the target and the components of it focus on the management of wild species of fauna and flora. The components of T4 are divided into harvest, trade and use, and they are all elements of management. 2. If the components of T8 are aiming at sustainable use of wild species of fauna and flora, they overlap with T4. For resolving the overlap, they should be rewritten to cover the status of access to biological resources for human food, livelihoods and health, which are exemplified in the target. 3. Headline indicator 8.0.1 states “number of people using wild resources for energy, food or culture”, but we think that essentially, there are few people who do not use wild resource for energy, food or culture, especially for food. Does “Traditional employment” in headline Indicator 8.0.2 indicate the so-called primary industry? Even so, the high percentage of the population involved in a primary industry does not necessarily mean good condition. Therefore both 8.0.1 and 8.0.2 are not likely to be appropriate indicators.
20	80-81	【Target 9】 1. As there is a possibility of trade-off between reduction of productivity gap and the conservation of biodiversity, CBD/SBSTTA/24/3/Add.2 should explicitly mention its relevance to the target in the first place whether it certainly contributes to the conservation and the sustainable use of biodiversity. 2. Although it only focuses on agriculture, other related sectors including forestry should be included. 3. In many developed countries, including Japan and across Europe, traditional livelihoods as well as the semi-natural ecosystems that have co-existed alongside small-scale agriculture for thousands of years have a positive impact on ecosystems. Therefore, nature-positive production should be also included as a monitoring element. Specifically, managed ecosystems other than current agricultural area or areas with its potential (e.g. buffer zone) should be included in the headline indicator 9.0.1.
20	82-84	【Target 10】 1. We propose revising the target as follows; the reasons are in 2-3 that follow. By 2030, increase contributions as provision of essential ecosystem services including services related to water and climate from nature-based solutions and ecosystem approaches ~~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~~. 2. Issues of hazards and air and water quality don’t need to be solved by Nature’s Contributions to People（NCP）alone, and it is difficult to quantify. 3. T7, which addresses similar issues, should be integrated into T10.
21-22	85-87	【Target 11】 1. We propose revising the target as follows; the reason is in 2 that follow.

		-By 2030, improve urban biodiversity and ecosystems and increase benefits ~~from biodiversity and green/blue spaces~~ for human health and wellbeing, including enabling all people to ~~the proportion of people with~~ access ~~to such~~ green/blue spaces ~~at least [100%]~~ 2. As mentioned in the addendum document, green and blue spaces can provide important habitat for species and provide ecosystem services, ensuring urban biodiversity should be placed in “green/blue spaces” with a view of conserving biodiversity. When creating “green/blue spaces”, it is important that its arrangement plan should integrate biodiversity. 3. The proposed headline indicator cannot evaluate numerical target. In addition, the viewpoint of biodiversity should be included. Hence, we suggest a new headline indicator instead of the current one as follows; Proportion of local governments that have developed a green space allocation plan that takes biodiversity into consideration
22-23	88-90	【Target 12】 1. Paragraph 90 in CBD/SBSTTA/24/3/Add.2 mentioned that there was little information on benefits shared, and hence it is obviously difficult to measure progress towards the current proposal of Target 12 (increase by [X] benefits). In addition, taking into account the reason which we wrote above regarding Goal C, we propose revising the target as follows. “By 2030, allocate ~~increase by~~ all of the benefits shared from utilization of genetic resources and associated traditional knowledge is utilized toward ~~for~~ the conservation and sustainable use of biodiversity ~~through ensuring access to and the fair and equitable sharing of benefits arising from utilization of genetic resources and associated traditional knowledge~~” 2. In accordance with the above, we suggest headline indicator 12.0.1 be replaced by complementary indicator 12.1.1.7 (Estimated % of monetary and non-monetary benefits directed towards conservation and sustainable use of biodiversity).
23	91-93	【Target 13】 1. For reversing biodiversity loss, it is important to mainstream biodiversity into all sectors as indicated in the addendum document. 2. Consideration is needed to make the scope of the headline indicators concrete. 3. With regard to component indicators, indicators that enables actors at all levels to carry out its activity based on environmental management system, and also that shows the degree of consideration for biodiversity in activities by each sector are necessary. 4. We propose to delete the component indicator 13.1.1 because, in general, it does not have a recognition to be an indicator that shows the degree of mainstreaming in each country. Hence, as alternatives, we propose indicators as follows; “Number or share of products, services and solutions contributing to conservation and its sustainable use of biodiversity (i.e. share of sale of such products, share of amount of such products, etc.)” “Number or share of countries, local governments and private companies integrating biodiversity and ecosystem service into their policy, action plans of environmental management system (i.e. ISO14001), or commitments relevant to concrete actions”
24	94-95	【Target 14】 1. Headline indicator 14.0.1 will evaluate “a situation as a result of their efforts”, rather than directly assesses the amount of the impacts or the progress. We suggest it be replaced by a quantitative indicator that can evaluate the whole negative impact on ecosystems. 2. We propose revising headline indicator 14.0.2 as follows; ”14.0.2 Number of Corporates which have sustainability report~~ing~~ includinges impacts on biodiversity” 3. Complementary indicator 14.1.1.1 Ecological Footprint can work as an indicator, since it can evaluate impacts quantitatively, and also global data and each country’s data are available. But, footprint related to ecosystems with exception of carbon footprint should be monitored for avoidance of the duplication of mandate under the UNFCCC. Thus we propose revising it to “14.1.1.1 Ecological Footprint (impact on climate is deducted)”

		4. Add the follows as a new complementary indicator; “LIME3 (Life cycle Impact assessment Method based on Endpoint modeling)” 5. Complementary indicator 14.1.1.3, which only focuses on MSC would be inadequate. Thus, other indicators certified by GSSI should be included in the indicator.
25	96-98	【Target 15】 1. As the alternative to the headline indicator, we propose the following; the reasons are in 2-3 that follow. - Share of supply of products and services contributing to biodiversity conservation or its sustainable use (i.e. eco-labelled) - Share of consumption of products and services contributing to biodiversity conservation or its sustainable use (i.e. eco-labelled) 2. While consumption patterns is important with its relevance to transformative change, it should be differentiated from SDG12 “ensure sustainable consumption and production patterns” and relationship with biodiversity should be clarified. For that, the indicator should be set to evaluate changes of consumption patterns by consumers, and also of patterns of provision of product by producers. 3. Biomass material footprint in headline indicator 15.0.1 cannot directly evaluate impacts on biodiversity. In addition, it cannot evaluate changes of consumption patterns and patterns for product provision. 4. We propose to delete component indicators from 15.1.1 to 15.1.4 since they would be captured in the headline indicators.
26	99-101	【Target 16】 1. We propose revising the target as follows; the reasons are in 2-3 that follow. “By 2030, through establishing and implementing necessary legal, administrative, technical and other biosafety measures in [X] % of countries, to reduce ~~prevent, manage or control~~ potential adverse impacts of modern biotechnology on biodiversity and human health ~~reducing these impacts by [X]~~.” 2. The proposed indicator indicates national measures stipulated by the Cartagena Protocol and the Supplementary Protocol. Thus, if a numerical target is to be set, we propose revising the target as follows because the current target is difficult to measure by numerical value; “By 2030, establish and implement measures to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health in [X %] countries reducing these impacts ~~by [X]~~” 3. While the scope is clearly stipulated in the Cartagena Protocol as “modern biotechnology,” the target indicates just “biotechnology”. Hence, the wording of the indicator should be revised in accordance with the Cartagena Protocol.
26-27	102-104	【Target 17】 １． We propose following amendments to the Target 17 with following reasons described in 2 and 3. By 2030, identify and redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] reduction in ~~the~~ ~~most~~ genuinely harmful subsidies, ensuring incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity. 2. The target and the monitoring indicator should encourage the Parties to identify harmful subsidies as a first step, since the work has not progressed under the Aichi Target3. Since the actual effects of subsidies mostly depend on the natural conditions and policy design of each country, it is important that all the parties examine their effects on biodiversity and make efforts to reform them. Accordingly, Japan proposes to add the term “identify” to the target17. Meanwhile, the term “most” should be replaced with “genuinely,” to mean that the genuinely harmful subsidies, if not the most harmful ones, should still be reduced. 3. It is also preferable that reference documents used to identify harmful subsidies are available to all the Parties. Japan appreciates the efforts of the OECD now working on the guidance document based on the decision at the COP14 (CBD/COP/DEC/14/22) and looks forward to its early completion.

		4. We propose the following amendments on the Headline Indicator 17.0.1, as positive subsidies are not included in the current list of positive incentives, while the Target itself deals with the reduction of subsidies. “Biodiversity motivated subsidies” has already covered by the OECD PINE database as the elements already included in the 17.0.1. “17.0.1 Biodiversity relevant taxes, … and on biodiversity relevant tradable permit schemes and biodiversity motivated government support as a percentage of GDP.” 5. We propose the following amendments to the Headline Indicator 17.0.2 with following reasons. First, since our discussion and the CBD mandate are both about biodiversity, we should not broaden the scope of the indicators. Second, ambiguous terminologies such as “potential” should not be applied here. “17.0.2 ~~Potentially h~~Harmful elements of government support to agriculture, fisheries and other sectors (~~environmentally~~ harmful subsidies to biodiversity)as a percentage of GDP” 6. With regards to the Complementary Indicators, we propose to delete the indicator 17.1.1.4, 17.1.1.5 and 17.1.1.6, and to add “Number of Parties that have undertaken national assessments of subsidies harmful for biodiversity” instead, for the following reasons. Firstly, subsidy reform is potentially required in all the sectors concerned, singling out some specific sectors is unfair and not appropriate. Secondly, the currently proposed indicators cover only 1/3 or less of the Parties, so we are concerned that may not even serve a complementary purpose. Finally, the OECD producer support estimate indicator, includes factors that are irrelevant to policy efforts, such as market price differentials caused by currency exchange rate, so it cannot capture the government’s fiscal expenditures accurately. Thirdly, the first step for the subsidy reform is to assess and identify harmful subsidies as mentioned in para2 above. So, the number of Parties that have undertaken national assessment well represents the progress toward achieving Target17.
27-28	105-110	【Target 18】 1. As pointed out in paragraph 109 of the same document and CBD/SBI/3/5, the target and corresponding indicators should reflect the following three pillars in a balanced manner. The three pillars are; - increase mobilized resources from all sources - reform (reduce and phase out) resource mobilization (subsidies and incentives) harmful to biodiversity - improve the effectiveness of mobilized resources 2. Besides, the addendum document is not giving any current data on efficiency and effectiveness of utilization of available resources. Therefore, current situation from this perspective should be added to the document. 3. Furthermore, according to paragraph 106 in the addendum document, domestic sources are far larger than international public finance for biodiversity. Therefore, we propose revising headline indicator 18.0.1 as follows so that the indicator can allow us to assess wider range of international and domestic resource mobilization; “18.0.1 ~~Official development assistance, P~~public expenditure and private expenditure on conservation and sustainable use of biodiversity and ecosystems at international and domestic levels”
28-29	111-114	【Target 19】 1. Education for the sustainable development is important. Especially, education for managers and workers in private sector is indispensable for implementing production and business activities with consideration for biodiversity. In this regard, the scientific and technical review on relevant information (on CBD/SBSTTA/24/3/Add.2) could be revised in the future taking into account the importance of sustainable development. 2. For that reason, we propose revising headline indicator 19.0.2 as follows; “19.0.2 Extent to which (i) global citizenship education and (ii) education for sustainable development, including gender equality and human rights, are mainstreamed at all levels in: (a) national education policies, (b) curricula, (c) teacher education, ~~and~~ (d) student assessments, and (e) management education and employee education of private companies.”

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