



**United States Department of State**

*Bureau of Oceans and International  
Environmental and Scientific Affairs*

*Washington, D.C. 20520*

3 February 2020

Ms. Elizabeth Maruma Mrema  
Officer-in-Charge  
Secretariat of the Convention on Biological Diversity  
413 Saint-Jacques Street, Suite 800  
Montréal, Québec, Canada H2Y 1N9

Dear Ms. Mrema:

The United States appreciates the invitation to provide input in response to the Secretariat's 4 December 2019 Notification No. 2019-108 regarding submission of peer review comments on the document "Indicators for global and national biodiversity targets - Experience and indicator resources for development of the post-2020 global biodiversity framework."

We are pleased to have the opportunity to share the attached views, and appreciate your consideration of this contribution.

Sincerely,

A handwritten signature in dark ink, reading "Barbara M. De Rosa-Joynt".

Barbara M. De Rosa-Joynt  
Division Chief for Biodiversity  
U.S. National Focal Point for the  
Convention on Biological Diversity

Attachment: U.S. Submission on "Indicators for global and national biodiversity targets - Experience and indicator resources for development of the post-2020 global biodiversity framework"

**U.S. Submission on Indicators for Global and National Biodiversity Targets –  
Experience and Indicator Resources for Development of  
the Post-2020 Biodiversity Framework  
3 February 2020**

Thank you for the opportunity to comment on the document “Indicators for Global and National Biodiversity Targets - Experience and Indicator Resources for Development of the Post-2020 Global Biodiversity Framework.” The United States believes that adopting measurable indicators at the same time as the post-2020 targets will be critical for tracking progress and ultimately achieving the goals. Moreover, by adopting indicators alongside the goals, Parties will agree at the outset to consistently report indicators that are measurable and comparable across countries.

We consider that the inconsistency in indicator reporting for the Aichi Targets was one major obstacle to tracking progress. Therefore, we believe that a more limited set of standardized indicators that are scalable between the national and global level could usefully be adopted for the post-2020 framework. In our view, it will be important to develop clear guidance on how to measure and report each indicator to ensure that Parties are doing so consistently. We recognize that this may be more difficult for Parties that are not already tracking the selected indicators. However, by only adopting a limited number, it is likely that resources can more readily be devoted to increasing capacity to measure and track them.

We anticipate that selecting a limited number of indicators will be difficult if too many complex goals are adopted. As a result, the United States believes that we should adopt a small number of headline goals with sub-goals to guide actions to achieve them. Because resources are limited, these goals should focus on the most pressing actions needed to address the main drivers of biodiversity loss, for example, perhaps one goal for each of the five main drivers of biodiversity loss identified in the IPBES global assessment (i.e. habitat loss due to changes in land and sea use, direct exploitation of organisms, climate change, pollution, and invasive alien species). Sub-goals could perhaps be structured as suggested by the OECD<sup>1</sup>, with indicators focused on the state of biodiversity, pressures on biodiversity, and responses to address these pressures. For example, if there is a headline goal focused on reducing overexploitation, there could be a state indicator on the trends in forest extent and a response indicator on the area of forest under sustainable management (e.g., under Forest Stewardship Council and Programme for the Endorsement of Forest Certification forest management certification). In our view, ideally selected indicators will have global data and can be reassessed periodically throughout the post-2020 timeframe.

The United States also has several comments on the table in Annex 2. In some instances, the SDG indicator that connects with the Aichi Target Indicator is listed, but not always, and we believe it is important to ensure consistency in referencing related SDG targets across the proposed suite of indicators. Just a few examples include: page 19 the indicator “Proportion of fish stocks within biological sustainable levels” does not include a reference to SDG 14.4.1; page 20 indicator “Average marine acidity (pH) measured at agreed suite of representative sampling

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<sup>1</sup> <https://www.cbd.int/doc/c/0590/6ddd/ab6b9375338ff831dcf5541d/sbstta-23-inf-03-en.pdf>

stations” does not reference SDG 14.3.1; and page 21 the indicator “Coverage of protected areas in relation to marine areas” does not reference SDG 14.5.1. We note that many indicators that were initially proposed for the SDGs, such as the Red List Index, were subsequently dropped during the OWWG-SDG review process in part because metrics developed by outside organizations are not necessarily transparent and may include indicators that do not meet some standards. In the case of the Red List Index, for example, invertebrates are currently not included, which is an important omission given the importance of pollinators. We believe it might also be useful to link the indicators to the Essential Ocean Variables (EOV), including biology and ecosystem EOVs focused on functional groups (e.g. fishes, birds, mammals) as well as habitat state. For example, on page 18, the indicator “Continuous Global Mangrove Forest Cover for the 21st Century” would connect with the EOV mangrove cover, and on page 21 the indicator “Live coral cover” would be coherent with the EOV coral cover. Finally, we consider that some of the proposed indicators could be better aligned with their relevant Aichi Target.

The lists of potential indicators provided by WCMC and OECD may be useful as the post-2020 framework is developed and could usefully be consulted as potential goals are considered. We believe it may also be useful to have an expert workshop after major target themes have been more developed with the objective of examining these available indicators and other additional candidate indicators (e.g. freshwater indicators; see Tickner et al. 2020<sup>2</sup>) as a means to identify promising candidates for each theme.

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<sup>2</sup> <https://www.preprints.org/manuscript/201910.0339/v1>