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General comments

The Post-2020 Global Biodiversity Framework outlines ambitious targets to halt and reverse biodiversity loss, reduce social inequalities linked to environmental degradation, and challenge 'business-as-usual' to put nature on a path to recovery for the benefit of people and the planet. To achieve these goals, the Post-2020 Framework should take a firm stance on the link between growth-based economies and environmental degradation as the root cause of biodiversity loss and social inequalities. The Post-2020 Framework should take bold steps to challenge conservation and recovery models that are dependent solely on profit-generating activities to achieve its goals and promote actions to disentangle natural resources and biodiversity from economic growth, and responding to the needs of workers and communities experiencing the acute effects of biodiversity loss.

Currently, the global political-economic system is organized around continuous economic growth. This positioning of perpetual economic growth as the foundation of the Post-2020 Framework means that the CBD continues to uphold an environmental governance model that asks nature to "pay its way" to preservation and restoration in the global marketplace. The Post-2020 Framework in its current form does not commit to action on unsustainable business activity, global resource inequalities, or human rights issues to restore nature-society relationships. While the Post-2020 Framework has taken a strong stance against illegal fishing and logging activities, the Framework is silent on issues of private sector interests that have largely ignored the negative environmental impacts of their activities, or actors who profit from biodiversity loss.

The Post-2020 Framework should outline a strong commitment to social and institutional changes to transform unsustainable patterns or production and consumption as the primary drivers of biodiversity loss. First, the Framework should take an explicit stance on the redistribution of wealth and resources to support poverty alleviation and biodiversity restoration efforts in vulnerable areas. Creating equality in access to natural resources will require an institutional shift in global governance institutions to acting against issues of over-production and perpetual economic growth driven primarily by transnational corporations. Unfettered corporate activity is responsible for large-scale biodiversity loss, pollution, and human rights abuses across the globe. The CBD can align itself with the needs of the planet and the world's most vulnerable people by taking a stance against the ongoing, unsustainable exploitation of resources and labor.

To achieve transformational change for people and the planet, the Post-2020 Framework should develop mechanisms to decouple resources from economic growth. The global workforce continues to experience issues of overwork and underemployment, alongside volumes of production that are exceeding global ecological limits. Disentangling natural resources from economic growth can guarantee the right to metabolism for ecological resources and systems (Mace 2014), and contribute to poverty alleviation by separating livelihood from market forces. The Post-2020 Framework should create a platform for non-state actors including environmental justice campaigners, academics, and labor rights activists, as actors that can design alternatives to current conditions (Bengtsson et al. 2017).

Specific comments		
Page	**Paragraph**	**Comment**
11	48	This proposed mechanism for implementation upholds the idea that nature should pay its way through a narrow profit-oriented economic model. The idea that actors should be incentivized to invest in biodiversity continues to position nature as a commodity, and cedes environmental stewardship to elite investment actors (Huber 2018). The financialization of the environment as sources of monetary value continues to overshadow the role of biodiversity for the wellbeing of people and the planet. For example, investments in water resources have resulted in the transformation of water from a basic element of life to a commodity to be traded for profit in the global marketplace. This has had disastrous (well-documented) consequences in terms of unequal access to water and the dispossession of communities from water resources. The Post-2020 Framework should outline clear mechanisms to improve access to natural resources. To do this, the Post-2020 Framework should take a human-rights approach to biodiversity restoration that links communities to free and accessible necessities. This would entail taking an explicit stance against insurance-linked securitization of recourses and catastrophe bonds as financial schemes designed to maintain economic flows in the event of further climate disasters (Huber 2018). The Post-2020 Framework can initiate a model for biodiversity restoration that views essential elements such as water, food, forests, and others as having intrinsic value to human and non-human life. This action would involve advocating for restriction against the further expansion of financial networks into conservation and restoration efforts.
15 23	63 93	This target cites the illegal exploitation and trade of organisms as a major driver of biodiversity loss, including the activities of illegal fishing and logging operations. This section sidesteps rampant issues of biodiversity loss and human rights abuses that are prevalent in legal industries, and often linked to illegal industries (Lunstrum 2018, Human Rights Institute at Georgetown Law 2019). The Post-2020 Framework should include a motion that dedicates resources to improving on-the-ground, community-based conservation efforts to facilitate a just-transition for people working in illicit industries. This should be initiated

		alongside efforts to monitor and respond to industries driving biodiversity loss, such as commercial fisheries using harmful equipment and producing by-catch that is destroying marine habitats. The Post-2020 Framework should support action against harmful and unregulated practices, and implement this in a way that levies consequences against both legal and illegal operations.