Template for the review of the draft information document CBD/SBSTTA/24/INF/21 on detailed 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

Overall, the current peer review is overlapping with the previous one which was focusing on the document CBD/SBSTTA/24/3/Add.2, hence it is not efficient to ask parties for their comments on the two similar documents. Given the notification by the secretariat, with respect to the comments already submitted by the Government of Japan in accordance with Notification 2021-012, we urge the Secretariat to reflect them as appropriate in the preparation of current and future relevant documents, and on that basis, we refrain from repeating our previous comments this time while hoping that our previous comments will be fully considered for the preparation of CBD/SBSTTA/24/INF/21 as well.

Specific comments

Page	Paragraph	Comment
13	46	According to this paragraph, the Nagoya Protocol aims to provide legal certainty and transparency, though the current document does not provide any data on the effectiveness of the protocol from such a perspective. Hence, the document should provide actual data rather than focus on reiterating the stated objective of the protocol.
14	53	According to this paragraph, information on the amount of benefits are to be required, but it is not possible to grasp the overall value on such an amount, as written in paragraph 47 on Page 13. Thus, the writing is mutually contradictory, and paragraph 53 should be rewritten to be in logically line with paragraph 47. Furthermore, as for the first sentence, we think that parties should not be required to monitor the amount of benefits shared, but instead focus on making progress on conservation and sustainable uses of biodiversity as a result of ABS agreements. We also think that the last sentence of this paragraph should be deleted (i.e. "given that the contents of ABS agreements are often confidential, consideration needs to be given to how such information could be accessed or used when reporting on the benefits being shared"). In our view, it is <u>not</u> appropriate to consider how to access information that is confidential. A requirement to track such information risk impeding access to genetic resources. Rather, we should be focusing our attention on promoting conservation activities for biodiversity

		under ABS agreements, which can be monitored with available information on uses of shared benefits.
15-16	58	Increasing number of initiatives and processes is mentioned here in the context of capacity building and scientific and technology transfer. Yet, without any specific/quantitative data of such initiatives and processes, this paragraph concludes that such efforts need to be scaled up. The current document should provide at least some examples of such initiatives and processes together with their outcomes, including their duration, budgets, beneficiaries and some examples of drafting related policies.
25	85	Taking into account the "Guidelines for conserving connectivity through ecological networks and corridors" published by IUCN, we propose to add as (d) the following: "Conserving connectivity through ecological networks and corridors being the third element of well-connected and effective system"
61-63	202-210	Target 12 includes "conservation and sustainable use of biodiversity", but the paragraphs 202-210 barely mentions this component.
67	226	In order to describe the overall negative impact of human activities on ecosystems, "exacerbated other drivers of change" should include the following: (f) Negative impact of human activities on ecosystems have been increasing. Worldwide, the ecological footprint without carbon footprint, which focuses on impacts on ecosystems, increased from 2000 by 11% in 2011, 18% in 2016, and further year by year.
69	228	Although an analysis of corporate reports and websites is mentioned in the middle part of the paragraph, together with data on cosmetic and food companies, it is unclear whether the data are cited from the information source written in the footnote 417 or 418. Otherwise, additional citation should be added here. We also wonder if any similar analysis has been conducted with regard to construction companies, financial companies, and IT companies. If so, adding some relevant data on such companies would be helpful. Japan can also provide best practices of biodiversity engagement by these companies.
69	228	As explained in the paragraph 228, little is known regarding businesses taking biodiversity into account in their supply chains, reporting processes and activities. Therefore, in order to collect such information, the monitoring framework of the post-2020 GBF should include indicators on "quantitative evaluation of the whole negative impact on ecosystems", "the number or the proportion of corporates which have sustainability reporting including impacts on biodiversity (negative impact, the volume of reduced negative impact)" and "the number or the proportion of the corporates which have sustainability reporting including sustainable procurement policy and countermeasures to reduce impacts on biodiversity".
69	229	ISO14001, an internationally-recognized system of environmental management, should be added to "integrated interventions" as an initiative to address biodiversity loss. The text should be corrected as follows: 229. Reducing the negative impacts of production practices and supply chains will require actions that address both direct and indirect impacts across a range of socio-

		economic systems. While reversing negative trends caused by these systems is possible, it will require integrated interventions applied at scale and a mix of trade policy, national laws, environmental management system (ISO14001) due diligence requirements, voluntary commitments and finance standards.

Comments should be sent by e-mail to secretariat@cbd.int by 23 April 2021. Please note that review comments previously sent on document CBD/SBSTTA/24/3/Add.2 will be considered in the revision of this document and there is no need to resend comments already submitted.