**COMMENTS FROM EIA-US, NRDC, CBD, IELP**

|  |
| --- |
| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** |
| *Contact information* |
| **Name:** | Danielle GRABIEL, Taylor TENCH, Paul TODD, Tanya SANERIB, Erica LYMAN |
| **Government** (if applicable)**:**  |  |
| **Organization:** | Environmental Investigation Agency (EIA-US), Natural Resources Defense Council (NRDC), Center for Biological Diversity (CBD), International Environmental Law Project (IELP) |
| **Address:**  | Environmental Investigation AgencyPO Box 53343Washington, D.C. 20009USANatural Resources Defense Council40 West 20th Street11th floorNew York, NY 10011Center for Biological Diversity2400 NW 80th Street, #146Seattle, WA 98117 International Environmental Law ProjectLewis & Clark Law School10101 S. Terwilliger Boulevard MSC 51 Portland OR 97219 |
| **Country:** | U.S.  |
| E-mail: | dgrabiel@eia-global.org, ttench@eia-global.org, ptodd@nrdc.org, tsanerib@biologicaldiversity.org, ejt@lclark.edu  |
| ***General Comments*** |
| **Thank for this opportunity to provide input on the monitoring framework and indicators for the post-2020 framework.** |
|  |
| **We recommend in the future that these documents be provided in all of the working languages of the Convention.** |
|  |
|  |
| ***Specific Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
| 1 | 3 | C | 29 | Under the “Trends in species extinctions” monitoring element, we suggest deleting the words “birds and mammals.” Limiting an examination of trends in species extinctions to birds and mammals is too narrow and will not provide an accurate assessment of progress towards improvements in faunal biodiversity. For example, the IPBES Global Assessment found that 40 per cent of amphibian species, almost a third of reef-forming corals, sharks and shark relatives and over a third of marine mammals are currently threatened with extinction. |
| 1 | 3 | C | 30 | Under the “Trends in species extinctions” monitoring element, we recommend deleting “extinctions prevented” and replacing it with “threatened species protected” such that the new sentence reads “Number of threatened species protected by conservation action.” |
| 1 | 3 | C | 32 (suggested) | Under the “Trends in conservation status of species” monitoring element, we recommend adding a new indicator as follows: “Percentage of species with changed conservation status.” Such an indicator is more readily useful in measuring whether the goal of preventing extinction and improving the conservation status of species is being achieved than listings alone. |
| 1 | 3 | A | 34 | Under “A4. Increase the population and health of species,” we recommend editing the language so that the word “population” is plural: “Increase the populations and health of species.” This edit would clarify that the goal is for individual populations of species to increase. |
| 1 | 3 | B | 34 | Under the A4 “Trends in species abundance” monitoring element, we suggest adding a possessive apostrophe to the end of the word “species” such that the new text reads: “Trends in **species’** abundance.” This edit would clarify that the goal is for individual populations of species to increase. |
| 1 | 3 | C | 34(suggested) | Under the A4 “Trends in species abundance” monitoring element, we recommend a new indicator “Change in species’ abundance values.” Such an indicator is more readily useful in measuring whether the goal of preventing extinction and improving the conservation status of species is being achieved than listings alone. |
| 1 | 5 | B | 55.1 (suggested) | Under the “B1. Nature’s regulating contributions including climate regulation, disaster prevention and other” monitoring elements, we suggest a new monitoring element of “Trends in the regulation of Biodiversity” that would encapsulate progress towards national and international policy setting (legislation and regulation) that is protective of biodiversity. This could include monitoring of compliance and implementation under CBD and other biodiversity-related conventions (CITES, CMS, Ramsar, World Heritage Convention, Convention to Combat Desertification, International Treaty on Plant Genetic Resources for Food and Agriculture), as well as broad-scale national policies for the protection of biological diversity and mainstreaming nature and ecosystem protection into domestic environmental policy.  |
| 1 | 5 | B | 55.2 (suggested) | Under the “B1. Nature’s regulating contributions including climate regulation, disaster prevention and other” monitoring elements, we suggest a new monitoring element of “Trends in the Regulation of Species that are Threatened with Extinction” that would encapsulate the establishment of national and international policies that are protective of species threatened with extinction. Indicators could include levels of compliance with international agreements related to threatened species such as CITES and CMS, which are tracked by subsidiary bodies or the Secretariats of those Conventions, as well as overall coverage of those Conventions including number of species assessed as threatened with extinction included on their respective appendices. They could also include the establishment of national laws and policies for the protection of endangered species.  |
| 2 | 12 | B | 53.1(suggested) | Under Component T3.1 (Active recovery and conservation management actions), we suggest adding another monitoring element to address “in-situ” programmes that compliments the existing monitoring element that addresses “ex-situ” programmes.  |
| 2 | 12 | B | 54 | Under Component T3.1 (Active recovery and conservation management actions), we suggest deleting “programmes” so the monitoring element tracks species’ recovery instead of tracking programmes for species’ recovery.  |
| 2 | 12 | B | 55.1(suggested) | Under Component T3.2 (Reduced human wildlife conflicts), we suggest replacing the existing monitoring element (Trend in human and wildlife conflict) with a monitoring element to track national and international policies for species’ recovery, which is a good indicator of conflict reduction.  |
| 2 | 12 | C | 56 | Under Component T4.1 indicator, we propose removing the word “illicitly” to improve clarity and eliminate redundancy. |
| 2 | 13 | B | 56.1 (suggested) | Under Component T4.1 (Harvest is legal, sustainable and safe for human health and biodiversity), we suggest a new monitoring element that looks at trends in the regulation of harvest and use. Indicators should include the number of species included in National Red Lists protected by domestic legislation. |
| 2 | 13 | C | 58 | Under Component T4.1 and the “Trends in proportion of biological resources harvested within the established harvest limits” monitoring element, we suggest adding the proportion of species covered by and harvested within domestic quotas and other restrictions as an indicator. |
| 2 | 13 | B | 59.1 (suggested) | Under Component T4.1 (Harvest is legal, sustainable and safe for human health and biodiversity), we suggest a new monitoring element that looks at trends in legal protection for species threatened with extinction. Indicators could include trends in the proportion of species threatened with extinction that are protected by CMS, and the number of countries with national legislation consistent with CMS obligations (both measured by the CMS Secretariat). |
| 2 | 13 | C | 61 | Under the Component T4.2 indicator, we propose removing the word “illicitly” to improve clarity and eliminate redundancy.  |
| 2 | 13 | B | 61.1 (suggested) | Under Component T4.2. (Trade is legal, sustainable and safe for human health and biodiversity), we suggest a new monitoring element that looks at Trends in legal protection for species threatened with extinction. Measures should include: Proportion of legal and illegal wildlife trade that consists of species threatened with extinction (measured by UNEP-WCMC), Number of countries with national legislation that is consistent with CITES requirements (measured by the CITES Secretariat) and proportion of species that are threatened with extinction that are protected by CITES (measured by CITES through its Strategic Vision indicators – see comments in the SBSTTA Indicators comments).  |
| 2 | 19 | B | 114 | Under Component T8.2 (Sustainable management of terrestrial wild species of fauna and flora), we suggest amending the existing monitoring element (Trends in terrestrial wild species of fauna used for food and medicine) so that it includes flora and especially emphasizes trends in the use of threatened species. Amended text would read as follow (new text in **bold**): “Trends in terrestrial wild species of fauna **and flora** used for food and medicine **especially threatened species.”** |
| 2 | 19 | B | 116.1 (suggested) | Under Component T8.2 (Sustainable management of terrestrial wild species of fauna and flora), we suggest a new monitoring element that looks at trends in regulations and prohibitions of species of fauna and flora used for food or medicine. Indicators could include the number and proportion of species threatened with extinction used for food and medicine, and prohibitions on use of threatened species for food or medicine.  |
| 2 | 21 | C | 132.1 (suggested) | Under Component T11.1(Trends in access to green/blue spaces) monitoring element, we suggest adding a conglomerate access to nature scoring index for cities such as the Trust for Public Land’s ParkScore Index. While TPL has used the methodology for North American cities predominantly, it could be applied to any city theoretically. We have included more information in the SBSTTA Indicators comments.  |

*Comments should be sent by e-mail to* *secretariat@cbd.int****no later than 25 July 2020****.*