

COMMENTS ON THE TARGETS OF THE ZERO DRAFT OF THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK (ZD-GBF)

Written Submission by the IUCN-CEM Fisheries Expert Group (FEG)

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Disclaimer: The following input does not represent a position from IUCN.

Preamble

The FEG comments refer to fisheries, with a focus on marine fisheries.

The expressions addressed in the comments are highlighted. Suggested changes to the draft are tracked.

2030 action targets

The Framework has 20 action-oriented targets for 2030 which, if achieved, will contribute to the outcome-oriented goals for 2030 and 2050. Actions to reach these targets should be implemented consistently and in harmony with the Convention on Biological Diversity and other relevant international obligations, taking into account national socioeconomic conditions.

General comment: The ZD-GBF as written by the co-chairs has the same number of Targets as the Aichi Framework. However, there is no successor to Aichi Target 6 on Sustainable fisheries and CBD Parties will need to decide to have a specific one or not. If fisheries are mixed up with all “sustainable use of wild species”, terrestrial and aquatic, defining SMART Targets for that conglomerate of biodiversity components and ecosystems will simply be impossible. Targets will likely be simply written and hence fuzzy and hard to report on accurately and consistently across ecosystems, countries, specie and populations.

Reducing threats to biodiversity

1. *Retain and restore freshwater, marine and terrestrial ecosystems, increasing by at least [50%] the land and sea area under comprehensive spatial planning addressing land/sea use change, achieving by 2030 a net increase in area, connectivity and integrity and retaining existing intact areas and wilderness.*

Comment: this text commits that the areas presently under Marine Spatial Planning (MSP) or similar cross-sectoral planning are to increase by half by 2030. This supposes that the area covered in 2020 is known. This area is likely to be small in most countries and ecosystems such an increase may be feasible. **There might be some debate about the definitions of “intact areas” and “ wilderness”** considering that most terrestrial and coastal ecosystems have been already modified.

2. *Protect sites of particular importance for biodiversity through protected areas and other effective area-based conservation measures, by 2030 covering at least [60%] of such sites and at least [30%] of land and sea areas with at least [10%] under strict protection [from extractive economic activities], [i.e. no-take areas].*

Comment

This sounds as a successor for Target 11. As drafted , the Target is ambiguous (hard to understand). Our interpretation would be that the Target commits to provide **some sort of formal protection** of 60% of the sites identified by 2030 as having "particular importance for biodiversity". This expression recalls the definition of “Key Biodiversity Areas” (KBAs) of IUCN but, it taken more broadly, might

also embrace all types of MPAs (I to VI), MMAs, LMMAs, OECMs and also KBAs and probably EBSAs but also marine Parks, sanctuaries, areas identified by the CMS, etc. A technical problem here is that the Target takes for granted that the present total KBA area is known, when in reality this area will keep evolving as research will progress. **A solution might be to take as reference the areas identified by 2030 (or 2050).** In addition, the Target calls for 30% of land and sea areas (and not only KBAs and other areas) to be covered with such forms of protection, of which 10% strictly protected (i.e. No-Take Areas?). If this is a correct interpretation, the Target would be calling for 30% of the Earth to be covered by the whole family of protected areas (not only MPAs and OECMs but also all other sorts of “protected areas” of which 10% strictly protected (non-extractive). It is hard to see what the end-impact would be on fisheries and management progress. **Finally “strict protection” may need to be explained and might cover “no-take areas” (with no fishing) or areas with no economic development at all.**

3. *Control all pathways for the introduction of **invasive alien species**, achieving by 2030 a [50%] reduction in the rate of new introductions, and eradicate or control invasive alien species to eliminate or reduce their impacts by 2030 in at least [50%] of priority sites.*

Comment: because of climate change very numerous marine species may become “invasive” as they move in order to remain within their ecological preferendum. In the Mediterranean, these species are already subject to important fisheries and reversal of the “invasion” is not technically conceivable. FEG does not know whether species displaced by climate change are to be considered invasive.

4. *Reduce by 2030 pollution from excess nutrients, biocides, plastic waste and other sources by at least [50%].*

No comment: The Target assumes that the amount of pollution by 2020 is well-known and will constitute a baseline. This does not seem likely.

5. *Ensure by 2030 that the harvesting, trade and use of wild species, is legal and at sustainable levels **and within an ecosystem approach**.*

Comment: This Target is the closest to Aichi Target 6 on sustainable fisheries but generalized to ALL wild species. For fisheries, it implies 100% elimination of IUU fishing-and-trade and a level of fishing pressure leading to general sustainability. A more complete successor to Target 6 is considered at the end of these comments. **We suggest adding a reference to the Ecosystem Approach with is a foundation of the CBD Text and should be applied on land and in the oceans.**

6. *Contribute to climate change mitigation and adaptation and disaster risk reduction through nature-based solutions providing by 2030 [about 30%] [at least XXX MT CO₂=] of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity and food security.*

Comment: rebuilding aquatic biomass through better fisheries management would be a nature-based solution for carbon trapping.

(b) Meeting people’s needs through sustainable use and benefit-sharing

7. ***Enhance the sustainable use of wild species** providing, by 2030, benefits, including **enhanced nutrition, food security and livelihoods** for at least [X million] people, especially for the most vulnerable, **e.g. small-scale producers within Indigenous People and local communities**, and reduce human-wildlife conflict by [X%].*

Comment: This is also relevant for fisheries and connects directly to Target 5, bringing in some specific human dimensions. The terminology strongly recalls the IPBES report language in the *IPBES Thematic Assessment of Sustainable Use of Wild Species* and, hopefully, the report will provide a

clear definition of “wild species” of relevance also to aquatic and marine species. “Sustainable use” is already defined in Art. 2 of the CBD. **There is a need to stress vulnerable communities which can also provide effective stewardship.** Again, here, having a % Target on human-wildlife conflict implies that the present number of human-wildlife conflicts (i.e. the baseline) is regularly monitored and presently known. Is that true?

8. *Conserve and enhance the sustainable use of biodiversity in agricultural and other managed ecosystems to support the productivity, sustainability and resilience of such systems, reducing by 2030 related **productivity gaps** by at least [50%].*

Comment: This Target is relevant for fisheries and relates also to Target 5 and 7. A “productivity gap” is usually a ratio between a given productivity (e.g. of a reference country or ecosystem) and a selected benchmark. The meaning of this expression needs to be clarified if indicators and reference values need to be identified and reported.

9. *Enhance nature-based solutions contributing, by 2030, to clean water provision for at least [XXX million] people.*

10. *Enhance the benefits of green spaces for health and well-being, especially for urban dwellers, increasing by 2030 the proportion of people with access to such spaces by at least [100%].*

11. *Ensure that benefits from the utilization of genetic resources, and related traditional knowledge, are shared fairly and equitably, resulting by 2030 in an [X] increase in benefits. **Actively involve small-scale producers, e.g. within Indigenous People and local communities***

Comment: this being a Target on allocation of benefits, it would be useful to specify the particular care needed by vulnerable human communities which can also provide effective stewardship

Tools and solutions for implementation and mainstreaming

12. **Reform incentives, eliminating the subsidies** that are most harmful for biodiversity, ensuring by 2030 that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity, **contribute to alleviate poverty and food insecurity and provide support for the most vulnerable in society, e.g. small-scale producers within Indigenous and local communities.**

Comment: in fisheries incentives-based management is more and more often promoted and it is usual to call for eliminating “perverse subsidies” which contribute to overfishing and perverse effects on biodiversity. A logical call. **However, trade-offs or perverse effects on food security and vulnerable communities need to be looked at carefully.**

13. **Integrate biodiversity values** into national and local planning, development processes, poverty reduction strategies and accounts, ensuring by 2030 that **biodiversity values are mainstreamed across all sectors** and that biodiversity-inclusive strategic environmental assessments and environmental **impact assessments** are comprehensively applied.

Comment: Classical call for integration of biodiversity concerns. In fisheries, this refers to mainstreaming of such concerns in fisheries development and management plans. The stress on **environmental impact assessment** is not new for the sector but has received too little application until now. More efforts in that direction are indeed needed.

14. **Reform economic sectors** towards sustainable practices, including along their national and transnational supply chains, achieving by 2030 **a reduction of at least [50%] in negative impacts on biodiversity**, ensuring robust assessment of environmental performance of sectoral management, integrating such reforms with poverty-reduction policies and minimizing their potential negative impacts on small-scale producers within Indigenous People and local communities.

Comment: Again a classical call on economic (structural) reforms of the economic sectors. For fisheries it would imply a massive adoption of the liberal economy paradigm (allocation of fishing

rights, reduction of fleets sizes) adequately adapted for coastal and vulnerable communities to avoid disastrous concentration of rights and ocean grabbing by larger-scale financial interests. **A reduction of 50% of the impact on biodiversity may be a challenge to define (indicators? Baselines?) and calculate, considering the range of impacts to be considered.**

15. **Resources**, including capacity-building, for implementing the framework have increased from all sources so that by 2030 resources have increased by [X%] and are commensurate with the ambition of the targets of the framework.¹⁴

Comment: very common call, always relevant as implementation capacity are often clearly insufficient in many, countries.

16. Establish and implement measures in all countries by 2030 to prevent potential adverse impacts of biotechnology on biodiversity.

17. People everywhere take measurable steps towards sustainable consumption and lifestyles, taking into account individual and national cultural and socioeconomic conditions, achieving **by 2030 just and sustainable consumption levels**.

Comment: Acting on consumption habits is one of the ways to improve fisheries sustainability by reducing demand but there could be debate on what a “**just** consumption level” is as neither tribunals nor States regulate such consumption levels”. Nonetheless, efforts towards **ecolabelling and education of consumer choices** are relevant.

18. Promote education and the generation, sharing and use of **knowledge** relating to biodiversity, in the case of the **traditional knowledge**, innovations and practices of indigenous peoples and local communities with their free, prior and informed consent, ensuring by 2030 that all decision makers have access to reliable and up-to-date information for the effective management of biodiversity.

Comment: The call for using multiple forms of knowledge is a classic, well agreed practice, the implementation of which should be strongly improved. Free, prior and informed consent (FPIC) is little used in fisheries but is very relevant for SSFs and coastal communities, requiring effective and equitable participation in decision-making.

19. Promote the **full and effective participation** of indigenous peoples and local communities, and of women and girls as well as youth, in decision-making related to the conservation and sustainable use of biodiversity, ensuring by 2030 equitable **distribution of costs and benefits participation** and **defendable** rights over relevant resources.

Comment: related to Target 18 above. There is no need to refer to “participation” twice. It is useful also to ask for equity both in relation to costs and benefits.

20. Foster diverse visions of good quality of life and **unleash values of responsibility**, to effect by 2030 new social norms for sustainability.

Comment: Opens the way to better consideration of human dimensions in fisheries, to improve stewardship. It may relate to Corporate Social Responsibility in Industrial fisheries, whether this was the intention. **The Target may relate to the high mortality rate in the fishing sector and the slavery conditions reported during the last few years, e.g. on some long-distance fishing vessels.**

SUCCESSOR TO TARGET 6

Parent Target 6

By 2020, all fish and invertebrate stocks and aquatic plants are: managed and harvested sustainably, legally and applying ecosystem based approaches, so that overfishing is avoided, recovery plans and measures are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.

Comment: To improve it for the 2030-2050 horizons, the content could be re-ordered to better separate the “stocks-related” elements of the Targets from the “ecosystem-related” ones. On fish stocks, it could be required that **ALL depleted species be recovered or recovering by 2020**. On the ecosystem, there could be a call for **risk assessment, maintenance of ecosystem (trophic chain) structure**, and improved definitions and effective implementation of **Significant adverse impact (SAIs) and Safe Ecosystem Levels of impact (SELs)**. The result is a slightly longer Target, necessarily but much more specific than the old one and in line with what fishery science and conservation science have recommended long ago and could be achieved if the present evolution of the sector in well-managed places could be scaled up. For such a Target, indicators and reference values are readily available or could become available with some additional work, so that the Target is “SMART”

By 2030, all targeted fish and invertebrate stocks and aquatic plants are managed and harvested sustainably, legally, using management plans, adjusting fishing capacity to productivity and so that the risk of overfishing of stocks is reduced and all depleted resources have recovered or are covered by recovery plans. Ecosystem and risk-management approaches are effectively implemented, maintaining ecosystem structure [trophic chain] in the long term, defining and avoiding significant adverse impacts (SAIs) on all species, particularly threatened species and vulnerable essential habitats and ecosystems, and keeping fisheries impacts on within defined safe ecological limits (SELs).