
03 FEBRUARY 2020

Post-2020 Framework Development

Submission on elements of the Zero Draft

About ACF

ACF is Australia's national environment organisation. We represent a community of over 600,000 people who are committed to achieving a healthy environment for all Australians. For more than 50 years, ACF has been a strong advocate for Australia's forests, rivers, people and wildlife. ACF is proudly independent, non-partisan and funded by donations from our community.

ACF welcomes the opportunity to provide comment on the goals, targets and indicators for the Post 2020 Global Biodiversity Framework (GBF) as outlined in notice 2019-108. Our submission on focuses on some key elements of the zero draft.

ACF is encouraged by the vision set out in the post 2020 framework, but stresses the goals and targets must be bolder if the agreement is to meet its promise of living in harmony with nature by 2050.

Attached to our submission are the outputs of a workshop convened by the Australian Committee for IUCN on the post-2020 framework in March 2018, which was supported by ACF. The key lessons and insights from this workshop and subsequent report provide insight into the views of a broad cross section of the Australian conservation community on the goals, targets, indicators and implementation mechanisms of the post-2020 framework.

Mission

The Zero Draft provides a useful starting point, but must lift its ambition if it is to address the biodiversity and extinction crisis that the world faces. It must form the base only from which ambition can build. Specifically, the Zero Draft contains some contradictions that send worrying signals. On one hand it calls for transformative change, for broad community support for conservation, yet in the footnotes to the text it states that *"completely halting the loss of ecosystems, species and genetic diversity is not possible by 2030"*.

The mission, as currently worded, is not ambitious enough and does little to communicate the outcomes being sought. It also contains a key equivocation (above) that undermines the intent and ambition of the entire framework.

A more robust vision would include specific commitment to the outcome in 2030 - that is to halt and reverse the loss of biodiversity for the benefit of people and nature.

Goals

Ecosystem goal (Zero Draft Goal a)

ACF supports the inclusion of an ecosystem goal however cautions against the unqualified use of no-net loss as the measure of progress. The use of no-net loss is entirely contingent on the appropriate baseline that has been set. Additionally, whilst it is possible to measure the area of ecosystems, there will be challenges in tracking and measuring changes in ecosystem integrity and how a “net loss” is monitored.

The current wording of the zero draft implies that no-net loss occurs in 2030, which effectively sets an open-ended window for the continued loss and destruction of ecosystems over the next decade. A more impactful approach would be to set a baseline year. For example, no net loss of ecosystems in 2030 should be measured against ecosystem extent in 2020 (or earlier). This would mean that restoration and proactive environmental stewardship must commence immediately following the execution of the agreement.

Additionally, consistent with the intent of the 2050 vision, the framing of this goal should be as a net-gain or net-increase in ecosystem extent and quality.

The following language for an ecosystem goal (Goal A) is more appropriate based on a 2020 baseline year.

Suggested goal wording:

Net increase by 2030 of freshwater, marine and terrestrial ecosystems, including their area, integrity and connectivity

Species level goal (Zero Draft Goal b)

For the CBD to drive and inspire the transformative change that it aspires to, it needs to create a bold vision for a world where people and nature thrive. The current zero draft excludes any mention of avoiding the human induced extinction of species, and instead focuses on a reduction in the number of species threatened with extinction. Both of these are critical to the success of conservation efforts globally.

It is strongly recommended that a goal in relation to the zero extinction of species is included in the post 2020 framework. The removal of a target to avoid extinctions represents a significant and notable backward step on the Aichi Targets and undermines the stated ambition and intent of the framework.

Suggested goal wording:

No human induced extinctions of known threatened species, including the improvement of 30% of known threatened species

Ecological Footprint goal

ACF supports calls for the inclusion of a specific goal aiming to minimise the ecological impacts of production and consumption. Such an approach would be consistent with the convention’s objectives and in line with commitments under the Sustainable Development Goals

Targets

Ecosystem Integrity (Zero Draft Target D 12 (a) 1)

ACF supports an ecosystem integrity and intactness target, however the language needs to be tighter. The inclusion of a spatial planning target is redundant as it represents an implementation mechanism, rather than a target. Language should focus on the key ecological and biodiversity values that require protection and restoration.

Suggested wording:

“By 2030 ensure the retention of all existing intact freshwater, marine and terrestrial ecosystems and wilderness areas whilst ensuring a net increase in connectivity and integrity across all ecosystems.”

Protected Areas Target (Zero Draft Target D 12 (a) 2)

Whilst supporting the broad intent, the drafting of this target is confused and incorporates too many elements. Aichi Target 11 remains one of the more effective targets for driving action because it had clear measurable reporting metrics.

The commitment to a 30% target of land and sea protected is important and welcome, however future targets need to also account for both quality of values protected and effectiveness of management. ACF supports the use of ecoregions and KBA's as key indicators, but these need to be more clearly integrated into the wording of the target.

Suggested wording:

Ensure the protection of 30% of all land, sea and freshwater areas through effectively managed protected areas or other effective conservation mechanisms that include all key biodiversity areas and other ecologically important areas in ecologically representative and connected networks

Additionally, the definitions of “strict protection” requires clarification (for example – via reference to specific IUCN management categories). A perverse outcome from defining 10% as strict protection may be that it opens remaining areas to unsustainable use or impact.

Alien Species Target (Zero Draft Target D 12 (a) 3)

Invasive species are a key threat to Australia's biodiversity, alongside habitat destruction and the growing impacts of climate change. This target is welcome in its ambition. Greater clarity is required in how proposed priority sites would be addressed.

With regard to indicators - ACF supports the use of legislative frameworks as a key implementation mechanism, however more specific indicators should focus on the abundance and populations of invasive species and impacts on native biodiversity.

Green space (Zero Draft Target D 12 (b) 10)

The inclusion of a target focussing on improving access to nature and health outcomes, particularly of urban communities, is welcome. In addition to focussing on access to nature within existing urban

environments, this target should be expanded to specify that such areas support biodiversity and/or other ecosystem services.

Removing Harmful Incentives (Zero Draft Target D 12 (c) 12)

ACF strongly supports this target and is of the view it should be delivered by 2025 and that all harmful incentives should be eliminated. Perverse or harmful incentives stifle innovation, encourage rent seeking and prolong unsustainable industries.

The removal of harmful incentives would free up significant resources for conservation action and community adaptation. Establishing a baseline of harmful incentives that operate will be critical for measuring and monitoring the impact of this measure. For example, removing one fossil fuel subsidy in Australia would free up to \$18 billion(AUD) over a four-year period that could be redirected into conservation and regional renewal strategies. Suggested wording of this target:

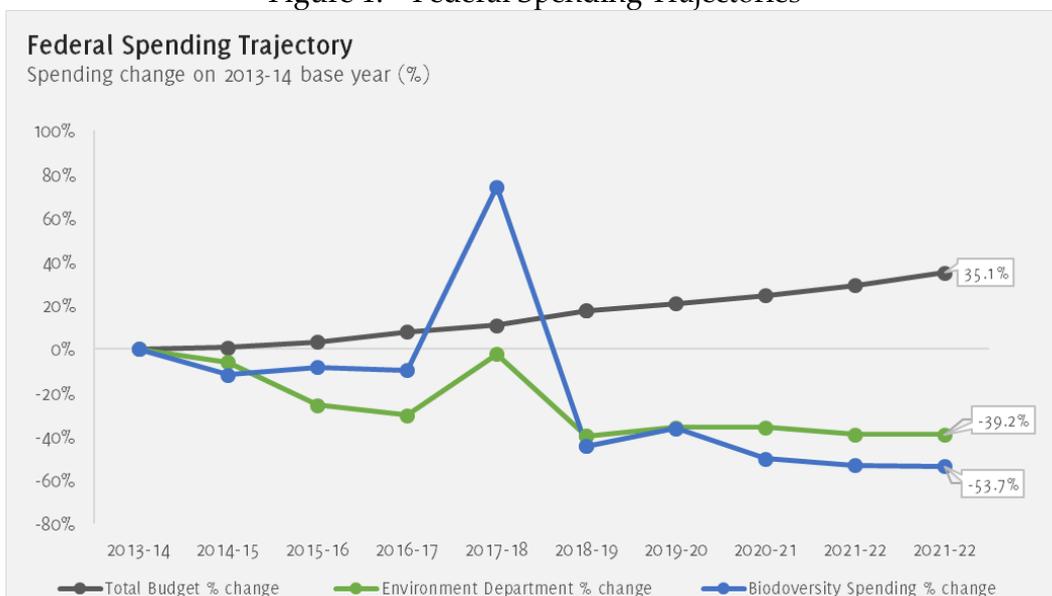
Suggested wording:

Remove harmful economic and regulatory incentives and subsidies that negatively impact biodiversity by 2025

Resources (Zero Draft Target D 12 (c) 15)

This target is of significant importance as it will be critical to enabling the achievement of relevant goals. The current approach outlined by the draft framework looks to increase resources by a certain percentage across all sources. This is problematic form of measurement on a few fronts. Firstly, it creates opportunities for cost shifting, unless adequate baselines are set for each sector of conservation financing. Secondly, it doesn't account for historic or long-term declines in resourcing. For example in Australia, federal administered spending on biodiversity programs has decreased by 36% when measured against 2013-14 as a base year. Over the forward budget period this is projected to decrease to 53% based on the federal government's current budget papers. At the same time federal government spending across all sectors has increased by 35% (see figure 1 below).

Figure 1. – Federal Spending Trajectories



In Australia biodiversity spending makes up a paltry percentage of overall federal spending, accounting for 0.05% of total government spending (or 5c in every \$100 spent). Thus a percentage increase of 100% against a projected 2020 baseline year (where biodiversity spending is projected to decline by more than 50% on 2013 levels) would only get Australian government spending back to its 2013 levels, which in turn, was insufficient to meet the Aichi targets. Acknowledging that the intent of the goal is to leverage resources from all sectors, this should not detract from the need for governments to lead on the protection of biodiversity through direct spending as well as creating policy settings that incentivise private and philanthropic investment.

A more appropriate and equitable metric would be a target that seeks to ensure an overall percentage of a states wealth or GDP are expended on conservation activities and the attainment of the relevant goals/targets. This is the policy position that has been adopted by the Ecological Society of Australia in relation to resource mobilisation and one that would make sense in the case of the post-2020 framework. For example a target of 1% of GDP from all sources would equate to more than \$18 billion (\$12 billion USD) in resources for transformative change to meet the aspirations of the CBD and the post 2020 framework in Australia.

Suggested wording:

Resources, including capacity building, for implementing the framework have increased proportionally from all sources so that by 2025 0.5% of national gross domestic product is being mobilised toward the achievement of the framework, increasing to 1% by 2030