Template for the review of the document on 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

Contact information	
Surname:	Tauli
Given Name:	Josefa Isabel
Government (if applicable)**:**	-
Organization:	Global Youth Biodiversity Network (GYBN)
Address:	-
City:	Baguio City
Country:	Philippines
E-mail:	josefa.tauli@gmail.com

General comments
General comment: The 2nd edition of the Local Biodiversity Outlooks (LBO-2) has been recognized as a key evidence base for the post-2020 GBF. Though mentioned in paragraph 4 of this document, findings from LBO-2 are insufficiently reflected in the whole of this document. LBO-2 provides many pertinent perspectives on each of the Aichi Biodiversity Targets from the perspectives of Indigenous peoples and local communities, as well recommendations for the post-2020 framework. It also provides a number of key transitions, the perspectives from which should be included more prominently throughout the document.
General comment: The document as it stands lacks reference to scientific and technical reports and sections in the IPBES Global Assessment and LBO-2 that reference positive synergies between human rights/equity and positive biodiversity outcomes, which are relevant to many goals and targets. Most concerning is the lack of reference to the importance of securing Indigenous and community tenure rights to achieving Goals A and B, and targets 1 and 2 (elaborated further below).
General comment on Section II-Relationship between vision, mission, goals and targets: This document could point out that the current structure of the framework, particularly the grouping of targets as well as how they feed into each of the current goals, remains unclear and unintuitive which could hinder communication of the framework and understanding by the general public. A comparison for instance, could be made to the structure of the Sustainable Development Goals, which are widely recognizable and easily communicated. Note: Attached as an annex (*) to this submission is a possible structure for the framework lifted from the GYBN position paper, which could serve as inspiration for a more organized framework, with clear correlation between goals and targets.

Specific comments		
Page	**Paragraph**	**Comment**
5	19	**Suggested text to add to the end of paragraph 19 (in bold):** "Net gain, or no net loss approaches, if not qualified, carry high risk of harmful outcomes. Thus, in accounting for net changes, safeguards would be needed, for example, to ensure that any loss is replaced by the same or similar ecosystems **[add:**

		,that no offsetting and greenwashing schemes are used to justify projects and policies that are harmful to biodiversity, that Free, Prior and Informed Consent of Indigenous peoples is respected, that the precautionary principle is applied,] and that critical ecosystems are not lost."
11-13	51-56	**Comment on paragraphs relating to Target 1 (Land/Sea use change) and Target 2 (Area-based conservation measures):** It is important within these paragraphs to reference the importance of securing Indigenous and community tenure rights to these targets, as evidenced in the IPBES Global Assessment and LBO-2, as well as many other scientific and technical reports. The document should reflect that ensuring full legal recognition of Indigenous peoples' rights to lands, territories, and waters, and local community rights to lands should be reflected in these targets and their indicators, which will significantly contribute to addressing land/sea-use change (Target 1) and are particularly important to achieving the outcomes sought by area-based conservation measures (Target 2). Similar comments apply to Goals A and B.
15	63	**Comment on paragraphs relating to Target 4 (Reducing threats from overexploitation and unsustainable use):** This paragraph does mention that "legal use is not necessarily sustainable," but could add that the current phrasing, specifically putting the word 'legal' before 'at sustainable levels' rather than the other way around (i.e. "is sustainable, legal, and safe") could lead to misunderstanding the purpose of the target. The reason is that if 'legal' is the first term, it might be interpreted that the main needed action is to legalize wildlife harvesting, trade and use, without taking into consideration how sustainable these activities are. That is, it could risk incentivizing the legalization of unsustainable use.
18-21	73-75, 82-84	**Comments on paragraphs relating to Target 7 (Climate change mitigation and adaptation) and Target 10 (Nature-based solutions and ecosystem services):** 1. The terms **'ecosystem-based approaches'** and **'nature-based solutions'** are used indistinctly in the document as well as in the proposed targets, while there is still not an agreed definition for 'nature-based solutions' under the CBD. We suggest only using the term **'ecosystem-based approaches'** in the document and the formulation of the goals, targets and indicators, at least until a definition and appropriate social safeguards and biodiversity safeguards for nature-based solutions are agreed under the Convention.The same applies for the plan of action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity. 2. If the term "nature-based solutions" is to be mentioned, we strongly suggest to mention it in the context of clearly pointing to existing cautions and concerns brought out in scientific and technical literature (such as those pointed to by this briefing paper, this policy newsletter, or those mentioned in this journal article) regarding the concept of "Nature-based solutions" including but not limited to concerns that it is distracting from the need to rapidly phase out use of fossil fuels and protect existing intact ecosystems; that the expansion of forestry framed as a climate change mitigation solution is coming at the cost of carbon rich and biodiverse native ecosystems and local resource rights, and other legitimate concerns that should be brought into consideration by the CBD as

		they would undermine achieving the objectives of the Convention as well as those of the UNFCCC. A paragraph on this should provide a summary of synergies and trade-offs associated with NbS, and the necessary principles, social safeguards and biodiversity safeguards that are not sufficiently reflected as of yet in the GBF draft.
25	96-98	**Comments on paragraphs relating to Target 15 (Sustainable consumption):** 1. As this target is related to addressing unsustainable consumption and production and public behavior change, we believe the paragraphs lack significant reference to the important role that formal, non-formal, and informal education plays in facilitating the values and behavior change needed to achieve this target, particularly in **paragraph 98**. We elaborate this further in our comments below on Target 19. 2. **Paragraph 96**: We propose to add at the end of the paragraph that this target is also closely related to proposed Target 19 on information, knowledge, traditional knowledge, and education. 3. A paragraph could be added to reference that behavior change, while difficult to measure, is crucial to addressing many indirect drivers of biodiversity loss including unsustainable production and consumption; and that there is a need to develop meaningful indicators to monitor behavior change. 4. **Paragraph 98** fails to tackle the topic of *accessibility* of sustainable alternatives. It mentions that we need to change consumer preferences, but the most environmentally friendly preference is not always accessible for all, due to possible geographic and importantly, socio-economic, reasons. It is therefore important to underline in this section the important role of making the more sustainable consumption options more accessible (as well as making the least sustainable ones less so).
29	111-114	**Comments on paragraphs relating to Target 19 (Knowledge):** 1. We propose adding a paragraph that references the broad international consensus identifying education as a key enabler for change toward sustainability, and that points to "Education, knowledge generation and sharing" as a leverage point for transformative change identified by the IPBES Global Assessment. This paragraph should also include reference to the role of formal, non-formal and informal education in facilitating knowledge acquisition, connectedness to nature, behavior change, and relational values. And finally, it could include an assessment that the current formulation of Target 19 does not reflect this sufficiently. 2. We propose adding a paragraph here that reflects that this target contains multiple crucial elements which may have to be dealt with separately to reach at least the ambition and comprehensiveness in the related Aichi Targets (ABT1 on public awareness, ABT18 on traditional knowledge, and ABT19 on knowledge sharing.)
29-30	115-117	**Comments on paragraphs relating to Target 20 (Participation):**

		1. We propose to add within these paragraphs a reference to the cross-cutting nature of the elements of this target, and its relevance to all other goals in targets in the framework. 2. We propose to add a paragraph assessing the current state/availability of indicators for monitoring the components of this target. Particularly, that indicators to monitor full and effective youth participation are lacking and will need to be developed.
30-31	121	**Comment on Section IV, paragraph 121 assessing proposed goals and targets in relation to addressing the <u>indirect</u> drivers of biodiversity loss:** The IPBES Global Assessment clearly points out that the indirect drivers of biodiversity loss are underpinned by societal values and behaviors. This paragraph should reflect that current goals, targets, and indicators do not currently address values and behavior change sufficiently, and should be strengthened, particularly as it relates to the elements in proposed Target 15 and Target 19. Furthermore, there are a number of indirect drivers that are not addressed in the targets, but are somewhat tackled and listed in the enabling conditions. These elements should therefore also be carried over as components of the draft targets; otherwise the GBF targets would have a big gap in addressing the root causes of biodiversity loss.
31	122	This paragraph should also mention the levers and leverage points which are <u>not</u> yet sufficiently addressed in the proposed goals and targets, rather than only mentioning those which are. All the levers and leverage points should be tackled by the GBF and it should be clear in this document which particular elements are still missing in this regard.
30-31	118-126	**General comment on Section IV:** A paragraph should be added summarizing the GBF goals and targets as they relate to the key transitions in LBO-2. Although this is mentioned in paragraph 118, there is lack of mention on this in the succeeding paragraphs of this section.

Comments should be sent by e-mail to secretariat@cbd.int by 22 March 2021

* **Annex:** A proposed structure for the framework lifted from the GYBN position paper, which could serve as inspiration for a more organized framework, with clear correlation between goals and targets.



Goal 1 • Integrity of our life support

1 Ecosystem integrity

- Threats to ecosystems reduced
- Ecological, functional, geographic, & structural connectivity maintained and restored
- Degraded ecosystems restored
- Territories, lands and waters, and resources of indigenous peoples and local communities fully recognized
- Natural habitats retained through equitable, effective, representative, well-sited, well-integrated, and well-managed protected areas
- Other effective area-based conservation measures identified, supported, & protected from threats

2 Status of species improved, extinction prevented

- Genetic diversity safeguarded
- Effective evidence-based management of threatened wild populations
- Sustainable harvesting, trade, and use of wildlife
- Intrinsic value of species, including common species, recognized

3 Invasive alien species addressed

- Control
- Eradication
- Prevent introduction
- Manage introduction pathways
- Early identification
- IAS on islands
- Technical & scientific information
- Regional & international cooperation
- Awareness, capacity-building, & resource mobilization

4 Biosafety ensured

- Safe use of living modified organisms & other new and emerging technologies
- Safeguards & free prior informed consent for indigenous peoples & local communities
- Implementation & enforcement of Cartagena Protocol

5 Ecosystem-based approaches for climate

- Conservation & restoration of carbon-rich ecosystems
- Identify trade-offs between climate solutions and biodiversity solutions
- Ecosystem-based approaches to climate change in planning, both in mitigation and adaptation measures
- Synergies with UNFCCC, UNCCD, SDG13
- Enhance urban biodiversity and green spaces in cities

Goal 2 • Society living sustainably



All forms of pollution reduced

- Sources of pollution addressed
- Waste management
- Synergies
- Mainstreaming
- Risk assessment
- Cooperation
- Addressing root causes of pollution including urbanization & industrialization

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Subsidies reformed

- Incentives & subsidies harmful to biodiversity identified by 2022
- Concrete & time-bound action plans developed for elimination or reform of subsidies by 2024
- All harmful subsidies eliminated, and incentives for conservation and sustainable use fully in place by 2030



Tackle consumption, production & waste

- Customary sustainable use recognized
- Managing harvest & trade
- Consumer choice & demand management
- Telecoupling
- Sustainable supply chains



Sustainable values, principles, and practices mainstreamed across sectors

- Sustainable practices enforced in economic sectors
- Biodiversity values integrated into planning & development strategies
- Enhance biodiversity awareness and action
- Sustainable fisheries
- Sustainable agriculture
- Revitalization & support for Indigenous food systems



Transformative education

- Mainstreaming values that promote respect for nature through education
- Intergenerational learning & transmission of knowledge
- Promoting educational practices that seek reconnection with nature
- Developing new narratives that create a paradigm shift for biodiversity
- Resources mobilized that lead to transformative biodiversity education
- Promote interdisciplinary and cross-sectoral collaboration in education

Goal 3 • Equity for nature and people



Benefits shared fairly & equitably

- Implementation & enforcement of Nagoya Protocol
- Clearing house mechanisms for the use of genetic resources
- Benefit sharing for IPLCs arising from the utilization of genetic resources, biological resources, ecosystem services, and indigenous and local knowledge relevant for conservation and sustainable use
- Benefit-sharing for women and girls



Nature's contributions to people ensured for all

- Food security
- Sustainable livelihoods
- Energy sourced sustainably
- Clean water
- Ecosystem-based disaster risk reduction
- Pollination-services ensured
- Family and community farming
- Cultural services



Intergenerational equity

- Full & effective participation of younger generations in policy development & decision-making
- Intergenerational equity in planning & implementation
- Intergenerational equity in policy, law, and institutions
- Access of younger generations to environmental information & capacity-building
- Operationalizing the precautionary principle
- Resource mobilization for intergenerational equity



Human rights & nature rights

- Ensure the human right to a safe & healthy environment
- Safe and enabling environment for environmental defenders
- Access to environmental information
- Equal access to biological resources for women & girls
- Respect for the rights of nature



Inclusive & meaningful participation

- Meaningful youth engagement & participation
- Full and effective participation of indigenous people and local communities (IPLCs)
- Equal engagement of women and girls
- IPLC, Youth, Women & NGO representation in Party delegations
- Establishing public participation mechanisms for decision-making
- NGO & grassroots organizations inclusion in environmental decision-making structures

Enabling conditions

