



LETTER nº 264/2020-CNA

Brasília, August 12, 2020.

Ms. ELIZABETH MARUMA MREMA

Executive Secretary of the Secretariat of the Convention on Biological Diversity

SUBJECT: Brazilian Confederation of Agriculture and Livestock (CNA) review contributions to Post-2020 Global Biodiversity Framework process.

As regards the Notification 2020-045 (Ref.: SCBD /SSSF /AS /KM /VA /88724) on the peer review of draft documents for the twenty-fourth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA 24), please note that the attached document with review comments and proposals of Brazilian Confederation of Agriculture and Livestock (CNA) aimed at contributing with the overall Post-2020 Global Biodiversity Framework process.

It is a pleasure for CNA to submit the review comments in reference, considering its role as a representative confederation of rural producers connected to the purpose to promote the sustainable use of biodiversity through agricultural and livestock sectors and with the mission of maintain the use of fostering innovation, resilience and good practices associated with biodiversity conservation.

Respectfully,


JOÃO MARTINS DA SILVA JUNIOR
President

Guidelines and template for the review of the draft monitoring framework for the post-2020 global biodiversity framework

I. Background

1. The second meeting of the Open-ended Working Group¹ on the Post-2020 Global Biodiversity Framework invited the Subsidiary Body on Scientific, Technical and Technological Advice at its twenty-fourth meeting to, among other things, carry out a scientific and technical review of the updated goals and targets, and related indicators and baselines, of the draft global biodiversity framework. Under agenda item 3 the Subsidiary Body will consider this issue.
2. Tables 1 and 2, presents a draft monitoring framework for the 2050 Goals and the 2030 targets respectively. These tables are being made available for the purposes of peer review. In both tables' interim formulations of the proposed 2050 goals and milestones and the 2030 targets are provided for context. Review comments are not being sought on these parts of the post-2020 global biodiversity framework at this time. Column A of the tables provides draft components of the goals and targets. Columns B and C of the tables provide draft monitoring elements and indicators to be used at the global level to monitor progress in the implementation of the post-2020 global biodiversity framework. Further column D provides information on the period baseline data is available for the indicator and on the frequency that the indicator is updated where known. Review comments are being sought on columns A, B, C and D only.

II. Submitting Comments

1. To ensure that your comments are given due consideration, please send them by e-mail to secretariat@cbd.int, at your earliest convenience but **no later than 25 July 2020**
2. When submitting comments, please adhere to the following guidelines as much as possible:
 - a. Please provide all comments in writing and in an MS Word or similar document format using the table provided below.
 - b. Please provide full contact information for the individual/Government/organization submitting the comments.
 - c. Please avoid commenting on issues related to grammar, spelling, or punctuation, unless it affects the overall meaning of the text, as the document will be edited as the final draft is prepared.
 - d. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest, if possible, what this text may look like or what should be included.
 - e. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
 - f. Please focus your comments on columns A (monitoring elements), B (indicators) and C (Indicator baseline year and frequency of updates) of the tables 1 and 2.

¹[CBD/WG2020/REC/2/1](#)

g. If you are suggestion the inclusion of additional indicators please provide information on if the indicator is currently operational, the organization supporting its development, its baseline (i.e. the year data is first available) and how frequently the indicator is updated (i.e. monthly, yearly, every two years etc.).

h. All review comments will be posted on the webpage² for the post-2020 global biodiversity framework in the interests of transparency

3. Should you have any questions regarding the review process, please contact secretariat@cbd.int.

III. Template for Comments

4. Please use the review template below when providing comments.

5. The complete draft of the monitoring framework has been released in a portable document format (PDF). For tables 1, 2 and 3 column letters and row numbers have been provided as well as page numbers. Please use these as a reference as illustrated in the table below. General comments can be included in the table by referring to Page 0 and Line 0.

TEMPLATE FOR COMMENTS

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework				
<i>Contact information</i>				
Surname:	Martins da Silva Júnior			
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<i>Comments</i>				
Table	Page	Column letter	Row number	Comment
1	2	C	1	Instead of using “forest area as a proportion of total land use”, as an indicator to Goal A, it is relevant to include any type of vegetation conserved regardless it does not follow the concept of forest; natural pastures, savannah and other types of native vegetation are key to biodiversity conservation. The expression “native vegetation areas as a proportion of total land use” allows to consider any type of native vegetation.
1	2	C	2	The indicator “Tree cover loss” should be changed for

²<https://www.cbd.int/conferences/post2020>

				“Balance of native vegetation cover” or “Native vegetation cover”. Ensuring the implementation of native vegetation management policies, such as the Forest Code in Brazil, the conservation and restoration of native vegetation are key assets to improve the provision of ecosystem services and reverse biodiversity losses, in accordance with the CBD’s objectives (especially the sustainable use and conservation). In this regard, it is appropriate to use an indicator that allows to measure the balance of native vegetation and not only considers the patterns of losses over time.
1	2	BC	15	Change the indicator “Trends in fragmentation and quality of forest ecosystems” for “Trends in fragmentation and quality of native vegetation ecosystems”. It is relevant to include any type of vegetation conserved regardless it does not follow the concept of forest provided by FAO. It is also important to measure the increase of ecological corridors that allow to mitigate the impacts of fragmentation of landscapes and seascapes, considering the effective area-based conservation measures adopted by Parties
1	2	C	16	An indicator regarding farmland biodiversity and sustainability of agricultural land should be tailored according to Parties policies aimed at, for instance: i) the adoption of good agricultural practices; ii) conservation and restoration of native vegetation on farms; iii) low carbon agriculture policies; iv) rural extension and technology deployment, especially for small scale producers.
1	5	C	51, 56, 58	The indicator “Number of certified forest areas under sustainable management with <u>verified impacts</u> on habitat conservation/restoration” should not be used excluding other non-certified forest and native vegetation conservation areas provided that those areas are managed under effective area-based conservation measures. Moreover, all types of native vegetation areas effectively conserved should be used as an indicator towards Goal B.
1	5	C	54	It is important to use as an indicator the “Number of Bee Farmers” as a tool to support and improve pollinators conservation.
1	6	C	64	Insert “Participation of biological resources on energy matrix”, consistent with national policies and regulations, ethanol and biodiesel from renewable sources.
1	6	B	65	Trends in the provision of food and feed from biodiversity should consider a broad range of indicators such as i) access to fruits and other food; ii) soil health and conservation and water conservation and responsible use as key assets to food production; iii) sustainable

				agriculture practices that promotes the continuous improvement of production with conservation measures; iv) the creation of genetic resources banks on a regional perspective, aimed at accessing and maintaining the diversity of food genetic resources.
1	7	B	79	Considering that CBD is a Party-driven process, potential indicators on the measurement of the resource mobilization efforts from the private sector are not applicable. The source of means of implementation should rely on Parties, banks and organizations. Private sector, philanthropies and other resources should not be considered as a compromised amount to the means of implementation and, therefore, should be considered as voluntary.
2	8	B	6, 7	Change the term “Forest” for “Native Vegetation Cover”.It must be a comprehensive indicator, which reinforces the value that each type of native vegetation brings to biodiversity conservation. In addition, it should include the restoration of native vegetation as a key target to be monitored.
2	9	C	22	Change the term “Forest” for “Native Vegetation Cover.”
2	10	C	29	The existence of native vegetation on farms and other producing landscapes is key to promote sustainable development of agricultural systems. The possibility to recover degraded land is also another key feature that should be considered aimed at promoting the conversion of degraded land to productive lands and also to native vegetation restoration.
2	10	C	35	Protected area coverage, including through other effective area-based conservation measures and its relation with the total area conserved by Parties.
2	11	C	38	Other effective area-based conservation measures should include a proportion on native vegetation on private lands, aimed at promoting native vegetation conservation and restoration on farmland. Parties should be encouraged to promote this kind of conservation measures, especially considering the positive biodiversity-climate-soil-water nexus that native vegetation can offer.
2	12	C	48	The proposed indicator - Number of certified forest areas under sustainable management with <u>verified impacts</u> on biodiversity conservation – is not suitable, <i>per se</i> , to measure the scope of the implementation of effective area-based conservation measures. It can be incentivized as a possible instrument, but it is quite relevant to consider that Parties does not engage directly in forest certification schemes.
2	12	C	49/50	Parties usually manage different policies, measures and

				programs aiming to implement and control protected areas and other effective area-based conservation measures. In this regard, it is quite important to have open indicators considering at least three outcomes: i) scale and effectiveness of native vegetation conservation; ii) restoration of native vegetation on these areas; iii) protection measures or sustainable use categories.
2	15	C	82	Only the nitrogen balance is not the appropriate indicator to measure the excess of nutrients. It is quite important to consider the appropriate use of nutrients and technologies as biological nitrogen fixation as indicators.
2	15/16	B	86/87/88	FAO has global data regarding the use of pesticides and herbicides. Despite of the existence of data, the rationale and appropriate use of inputs must be promoted. One indicator that should be considered is, therefore, the existence of regulations to approve and monitor the use of inputs considering safety instructions and requirements. Another indicator should be the implementation of programs to recycle inputs packages as a manner to control and avoid contamination of residues of the products. Another indicator should promote the use of integrated pest management practices, according to climate and regional characteristics, aimed at achieving effective control practices.
2	16	C	91	It is extremely relevant to consider the level of reuse of wastewater as an indicator, especially because it assumes the need to adopt technologies that will allow to treat and reuse wastewater, as well as contribute to a circular economy.
2	16	C	97/98	Include “conservation and restoration of native vegetation” as a key indicator towards measuring trends in carbon stocks in different ecosystems. The case of the Forest Code implementation in Brazil is one example.
2	20	C	118	Another indicator that should be used to measure the effectiveness of agriculture under sustainable practices is the amount of degraded land restored as a percentage of the total agriculture area degraded. The restoration of degraded land to productive agricultural systems is key to enhance carbon stocks, soil recovery, foster food production which is key to SDG 2, reduce the need for new production areas, and other positive outcomes.
2	20	C	119	Areas of agricultural land under conservation agriculture as an indicator should consider, for instance, the adoption of continuous improvements such as: i) good agricultural practices; ii) technologies that allow to enhance productivity and maximize the outputs per

				<p>hectare, fostering adaptation of agricultural systems and reducing GHG emissions; iii) conservation and restoration of native vegetation on farms as a trigger to promote carbon stocks, biodiversity corridors and soil conservation, among other benefits; iv) integration of agriculture, livestock and forestry as ways to enhance the total productivity per hectare, promote and enhance soil fertility, avoid degradation and diversify production.</p> <p>The coexistence of different agricultural systems provided they promote and effectively adopt the indicators above is key to foster a resilient and sustainable agriculture.</p>
2	20	C	121	<p>The trends in pollinators is an important indicator that must be considered. However, it is extremely relevant, as future targets for 2030 and 2050, to incentivize and capture the number of bees producers and pollinators creators as a way to directly incentivize pollination, in such a way they are a tool to promote sustainable and resilient agriculture.</p>
2	20/21	A/B/C	125	<p>Sustainable management of all types of forests is one indicator. However, it seems quite relevant to include the sustainable management and conservation of native vegetation according to Parties' policies, needs and strategies.</p>
2	21	C	126	<p>The sustainable management of all types of forest can be supported by forest certification schemes. Considering that those schemes are voluntary and not mandated by Parties regulations, it is not reasonable to agree on an indicator naming specific certification schemes. This could disregard other schemes and mechanisms; the effective management of the forests is the goal, regardless how it has been achieved.</p>
2	22	A	140/145	<p>Considering the basic goals of the CBD and the Nagoya Protocol, it is extremely relevant to promote, incentivize and support the access, knowledge, research and development based on genetic resources. In this sense, it seems quite important to promote the creation of genetic resources banks on a regional basis, especially in countries that are biodiversity rich and/or centers of origin, especially in developing countries. Those genetic banks should strive the creation and increment of genetic banks, the share of resources on a Nagoya Protocol basis, comprising PIC and MAT protocols, leading to innovation and benefit sharing. Developed countries should support the establishment of those genetic resource's banks in all continents, according to decisions from the Parties aimed at implementing the Global Biodiversity Framework.</p>

2	29	C	177	<p>The debate around the private sustainable forestry certification schemes and other market-based mechanisms focused on timber products ought not be treated too simplistically. Since FSC and PEFC forest management certifications are voluntary initiatives in nature, there are substantial and critical concerns on the potential of standards to hinder international trade, pose market access problems between countries, and provoke the incurrence of extra costs of compliance at national level, especially for producers in developing regions. The CDB should not promote specific certification schemes as ways to assure sustainable production. In addition, the confidence among consumers on the certification schemes is a question to be carefully considered at the national level through transparent public timber procurement policies.</p> <p>The use of voluntary certification can be a way to promote sustainable production, but Parties should agree on the best ways to promote it as targets that would be managed and supported by Parties.</p>
2	33	A	203-204	To allow an objective indicator, the restoration and compensation for damages to biodiversity caused by LMOs must be based on the concept of damage and significant from Article 2.2 (b) and Article 2.3 of the Nagoya-Kuala Lumpur Supplementary Protocol.
2	33 34	C	205	Harmful subsidies is a open broad concept. The Brazilian inland development and welfare of that population needs a governmental support that could be confused with harmful subsidies.
2	35	B	217	Considering that CBD is a Party-driven process, potential indicators on the measurement of the resource mobilization efforts from the private sector are not applicable. Efforts should be strived to creating effective and reliable sources of funding from Parties to support the implementation of the Global Biodiversity Framework. Voluntary funding from the private sector could be considered as a separate source of funds, not controlled or managed by Parties.
2	37	C	231	Indicator 12.6.1 requires data on the number of companies publishing sustainability reports. However, a decision from the Parties cannot, <i>per se</i> , mandate and create obligations to the private sector within the CDB. It is important to understand that the full development and effective application of voluntary and mandatory reporting frameworks or policies are subject to national circumstances and well-recognized sustainability standards by and across sectors, which are adopted at national level and company level. In general, this is a process that requires time and capacity building in the

				field of SDG reporting, in order to avoid the creation of new reporting standards or frameworks. In this sense, pilot-testing are needed to validate the proposed methodology for data collection. Further developments and considerations are needed before turning the indicator 12.6.1 into an indicator of the GBF.
				Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”

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