**Republic of Tunisia**

**Ministry of Environment**

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General Direction of Environment

and Quality of Life

**Tunisia Peer Review of the** “Draft monitoring framework for the post-2020 global biodiversity framework for review”

Submission of Tunisia referring to Notifications 2020-045 and 053, “Peer review of draft documents for the SBSTTA 24.

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| ***Table*** | ***Page*** | ***Column*** | ***Row*** | **Comment** |
| ***1*** | ***5*** | ***C*** | ***56*** | Additional indicators are required for other climate regulating ecosystems, particularly marine and coastal ones to represent the contribution of blue carbon to climate regulation, which are on par with terrestrial forests in terms of demonstrating trends in regulation of climate. |
| ***2*** | ***11*** | ***C*** | ***39-42*** | Recommend to add an additional indicator under this monitoring element as follows: “Protected area or OECM coverage of Ecologically or Biologically Significant Areas (EBSAs).” |
| ***2*** | ***11*** | ***C*** | ***40*** | The indicator only measures proportion of important terrestrial and freshwater Areas. Should be an indicator for marine and coastal sites as well (tracking trends in Protected Areas or OECM’s coverage of EBSAs). |
| ***2*** | ***12*** | ***C*** | ***59*** | We note a bycatch related monitoring element is included under Target 8, but it also belongs here if we are talking about sustainable harvest.  Suggest including bycatch monitoring element as follow: “Trends in population and extinction risk in bycatch species” |
| ***2*** | ***13*** | ***B*** | ***65*** | “Trends in proportion of biological resources  used within the established limits/quotas” is only reliable as a measure of sustainability if those limits/quotas have been set sustainably, and commensurate conservation outcomes ensue for target populations. For example, Many RFMOs and domestic fisheries set quotas far above limits recommended by scientific advisory bodies, yet such quotas would qualify under this element despite the fact they are unsustainable. |
| ***2*** | ***18*** | ***C*** | ***105-109*** | "Sustainable fisheries management" must incorporate "ecosystem-based fisheries management". This will help insure benefits to communities from other avenues besides harvesting such as ecotourism or recreation.  Suggest including an additional indicator here as follows: “Number of countries using ecosystem-based approaches to manage marine areas (SDG indicator 14.2.1)” |
| ***2*** | ***33-34*** | ***C*** | ***208-2010*** | Indicators listed are limited to agriculture and fossil fuels. These are important, but recommend also adding “forestry and fisheries”.  Suggest this additional monitoring element:  “Trends in the elimination and reduction of harmful fisheries subsidies under the WTO Agreement of Fisheries Subsidies” |
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| ***1*** | ***2*** | ***C*** | ***11*** | It is unclear why saltmarsh area is in column C while coral reefs, seagrass, and mangroves are in Column B. Why the difference? Absent a compelling rationale to the contrary, we recommend elevating “saltmarsh extent” to Column B as a monitoring element. |
| ***1*** | ***3*** | ***C*** | ***34-35*** | It could be argued that a fisheries indicator is from Goal A and specifically section A4 and A5 as well. Unsustainable and excessive fishing obviously threatens the resilience of species and their genetic diversity. The following are several recommended indicators for consideration:  - Fisheries Management Effectiveness (Ocean Health Index)  - Number of fisheries with precautionary science-based management plans  - Changes in the ecological health and stock abundance of fisheries  -Number of fisheries where full harvest strategies have been adopted, implemented, or are in development.  -Number of fisheries with sufficient observer coverage systems to address illegal and/or unsustainable harvest and to correctly estimate bycatch rates.  -Number of fisheries where management is based on formal stock assessments |
| ***1*** | ***5*** | ***A*** | ***51-63*** | Coastal habitats are missing here (apart from reference to water quality) yet they carry proven benefits (included in UNFCCC/NDCs for climate change adaptation and mitigation).  suggested additional indicator: “Number of certified blue carbon ecosystems areas, such as wetlands, mangroves, seagrasses, etc., under sustainable management with verified impacts on carbon sequestration/storage.”. |
| ***1*** | ***5*** | ***C*** | ***56*** | coastal wetlands/peatlands/blue carbon ecosystems are on par with terrestrial forests in terms of demonstrating trends in regulation of climate. As stated earlier, we suggest adding the following indicator:  “Number of certified blue carbon ecosystems areas, such as wetlands, mangroves, seagrasses, etc., under sustainable management with verified impacts on carbon sequestration/storage.” as an additional indicator here. |
| ***2*** | ***10*** | ***B*** | ***26*** | As stated under the goals section, we recommend the following relevant indicators for consideration:  - Fisheries Management Effectiveness (Ocean Health Index)  - Number of fisheries with precautionary science-based management plans  - Changes in the ecological health and stock abundance of fisheries  -Number of fisheries where full harvest strategies have been adopted, implemented, or are in development.  -Number of fisheries with sufficient observer coverage systems to address illegal and/or unsustainable harvest and to correctly estimate bycatch rates.  -Number of fisheries where management is based on formal stock assessments |
| ***2*** | ***12*** | ***C*** | ***51*** | We recommend adding the following to the indicators measuring increased protection and conservation effectiveness (esp. as it relates to OUTCOMES):   * Applying IUCN’s Global Conservation Standards to MPAs . * MPA Guide: Shared Vision to Describe MPAs and the Conservation Outcomes They Provide . * IUCN Guidelines on recognising and reporting other effective area-based conservation measures .   These indicators may also be appropriate under T2.4 |
| ***2*** | ***18*** | ***C*** | ***105-109*** | "Sustainable fisheries management" must incorporate "ecosystem-based fisheries management". This will help insure benefits to communities from other avenues besides harvesting such as tourism or recreation.  Suggest including an additional indicator here as follows: “Number of countries using ecosystem-based approaches to manage marine areas (SDG indicator 14.2.1)” |