

Submission by Switzerland responding to the invitation to participate in the review process on draft documents related to Agenda Item 3 of SBSTTA-24 - **Annex 1: Review comments on the draft monitoring framework for the post-2020 global biodiversity framework**

TEMPLATE FOR COMMENTS

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework				
<i>Contact information</i>				
Surname:	Baerlocher			
Given Name:	Norbert			
Government (if applicable):	Federal Department of the Environment, Transport, Energy and Communications DETEC			
Organization:	Federal Office for the Environment FOEN			
Address:				
City:	CH-3003 Bern			
Country:	Switzerland			
E-mail:	Norbert.Baerlocher@bafu.admin.ch			
<i>Comments</i>				
Table	Page	Column letter	Row number	Comment
0	0	0	0	<p>1. General comment on the need for a simple way to assess progress towards goals/targets</p> <p>In the draft monitoring framework published for peer review, most goals and targets are split into several components and monitoring elements. For the different goals and targets, a total of 228 indicators are listed. This figure is much higher than what is needed. We should aim at having one single indicator per monitoring element. The fact that the number of indicators per monitoring element and component is variable, from none to many, makes it very complicated to assess the general progress towards goals, targets and 2030 milestones. Therefore, in addition to a broader set of indicators encouraged for use in the post-2020 global biodiversity framework, a reduced number of compulsory indicators of a higher tier or so called headline indicators should be proposed to measure the global progress towards goals/targets/milestones and make communication effective.</p> <p>The proposed monitoring framework could serve as a basis for discussion at SBSTTA-24 on a small set of compulsory headline indicators that are quantitative, consistent and comparable across countries. In many cases, those global indicators could be an aggregation of a selection of the monitoring elements indicators. For example, the extent of natural ecosystems could be easily summed from the extent of each ecosystem (land, forest, desert, coral reef, etc.).</p> <p>2. General comment on the framework ability to monitor implementation</p> <p>The aim of the monitoring framework should be to monitor the</p>

			<p>implementation of the post-2020 global biodiversity framework. For reviewing the implementation, multiple sources of information are needed: national reporting (including national and regional indicators), global indicators, reports of multilateral environmental agreements and international organizations, etc.</p> <p>3. Detailed comments on the document for peer review “Draft monitoring framework for the post-2020 global biodiversity framework”</p> <p>In this context and keeping in mind that we need a simple way to assess progress towards goals/targets, Switzerland has commented the proposed monitoring framework in detail in its submission, assuming that this will improve the basis for an informed discussion on a small set of compulsory global indicators of a higher tier.</p> <p>Comments on the monitoring elements</p> <p>National reports under the CBD can only tell part of the story, the reporting frameworks of biodiversity related MEAs as well as other international agencies need to complement information gathered through the monitoring framework. This should be considered in the development of the monitoring elements. The framework should strengthen the concepts of nature’s contribution to people and transformative change, essential elements of the IPBES global assessment. This has to be reflected throughout the monitoring elements.</p> <p>Comment on indicators</p> <p>To the extent possible, the GBF should build on existing and well-established indicators (see the list of important criteria below). However, to capture the entire scope of the goal and target system, additional indicators will need to be developed. This especially at the higher tier level. The clearer the monitoring element is shaped, the more targeted the development of new indicators will be. In this context, we welcome the information document “Indicators for the post-2020 global biodiversity framework” prepared for SBSTTA24 by UNEP-WCMC in collaboration with the Biodiversity Indicators Partnership. The analysis presented within will be of great help to update the monitoring framework.</p> <p>When updating the proposed draft monitoring framework for the post-2020 global biodiversity framework, the following aspects should be considered:</p> <ul style="list-style-type: none"> - Unambiguous indicators For Switzerland, an indicator should measure unambiguously the level of achievement of a specific target. The units of the target should be the unit of the indicator. In addition, the indicator should as much as possible match the scope of the target. Measuring only forest extant in the context of a target on natural ecosystem area is for example not sufficient. Regarding indicators for goals and targets addressing people, it might be appropriate in certain cases to choose well established indicators (e.g. SDG indicators) with a scope beyond biodiversity. - Synergies with other reporting processes Switzerland strongly emphasizes the importance of looking for synergies within approved indicator sets. Indicators developed in the context of the Sustainable Development Goals (SDGs) or used in the
--	--	--	---

				<p>reporting of other Multilateral Environment Agreements (MEAs) including in the other Rio-Conventions should be selected in priority.</p> <p>- Choosing "institutionalized" indicators Many institutions already provide well-documented indicators. For example, the World Database on Protected Areas (WDPA) is the reference for indicators on protected areas and the International Union for Conservation of Nature (IUCN) provides indicators based on the red lists. Switzerland recognizes the excellent work carried out by these institutions and others and favours the use of their indicators.</p> <p>- Global and national scale Scale is another factor of importance. Indicators must be as much as possible calculable both nationally and globally. This will ensure national endorsement and allow parties to compare their indicator value to the global average.</p> <p>- One indicator for each monitoring element Until now, the number of indicators present on the various existing lists has been ever increasing. This is a good thing as it shows the progress of data and analyses on biodiversity. Nevertheless, a monitoring element should as far as possible ideally only have one appropriate indicator. A single indicator for each monitoring element ensures consistent and comparable use of indicators by all Parties to assess progress and results in an unambiguous reporting.</p>
1	2-5	A-D	1-50	<p>General comment to Goal A We consider it important to keep the monitoring elements on ecosystem integrity as a separate component. Area and integrity cannot be mutually substituted and should not be conflated in one integrated indicator to measure progress towards achieving ecosystem-related goals (see INF 9 for SBSTTA 24). Moreover, there exist several working definitions for the "integrity" of ecosystems (it becomes "quality" in the monitoring elements). A mutual understanding would be easier to find if the secretariat could provide a clear definition to the term. Integrity can be safeguarded, but can also be restored. We are thus surprised that the keyword "restoration" lack altogether in the components, monitoring elements and indicators of Goal A.</p> <p>We additionally propose to add the Mountain Green Cover Index indicator as an element for monitoring the increased extent of natural ecosystems. It could be inserted as a new line 3 immediately after the indicator on "Tree Cover Loss". Additionally it could also be added as an indicator to the monitoring element "Trends in areas of particular importance for biodiversity conserved".</p>
1	5-6	A-D	51-71	<p>General comment to Goal B We understand that the components of Goal B relate directly to the three types of NCP. While we support this direct link to the work of IPBES, we believe that the formulation of the monitoring elements can be somehow misleading. For example, "Trends in pollination" could read "trends in abundance and diversity of pollinators" as this is what is measured by the indicator. In general, the trends should be formulated such as reflecting government and/or stakeholder action or results of such action. Also, there should be either an existing or at least a theoretically conceivable indicator (or in fact a reporting</p>

				<p>question to governments) related to the monitoring element. Otherwise the monitoring element seems detached from both the component and the target. Monitoring elements lacking indicators should anyway be kept to be consistent with the list of all NCPs. We remark that there is no clear way how the 2030 milestones can be assessed with the proposed framework. This especially for the milestone 2. We therefore propose to add a new component on biodiversity valuation.</p>
1	4	A-C	36-41	<p>The proposed monitoring framework for Goal A, component A5 and goal B, component B1 contains important components, elements and indicators, which Biosafety issue (target 16) could be related to. However, the relation between the framework for the 2050 Goals and the 2030 targets remains unclear/disorganized with regard to the Biosafety issue (potential adverse impact of biotechnology on biodiversity).</p> <p>With regard to A 5, we may suggest adding to the monitoring element "trends in the diversity of wild species" the following indicator "comprehensiveness of conservation of socioeconomically, culturally valuable species, as well as for their intrinsic value" Same addition regarding the monitoring element "Trends in the diversity of wild relative" would be consistent.</p> <p>Additionally, the title for each column should be completed to "trends in the genetic diversity of".</p>
1	5-6	A-D	51-71	<p>We suggest to include the following new component for goal B: "Nature is valued through green investments, ecosystem service valuation in national accounts and public and private sector financial disclosure"</p> <p>The new component should include the following four new monitoring elements and four corresponding indicators:</p> <ol style="list-style-type: none"> 1. Monitoring element: "Trends in green and in particular biodiversity net-positive investments" <ol style="list-style-type: none"> a. Indicator: "Number of countries with an established taxonomy and / or monitoring framework for sustainable and green investments" 2. Monitoring element: "Trends in integration of biodiversity and ecosystem service values into planning processes" <ol style="list-style-type: none"> a. Indicator: "Number of countries that have established national targets in accordance with or similar to Aichi Biodiversity Target 2 of the Strategic Plan for Biodiversity 2011–2020 in their national biodiversity strategy and action plans and the progress reported towards these targets (SDG indicator 15.9.1)" b. Period: 2020 3. Monitoring element: "Tends in integration of biodiversity and ecosystem service values into national accounts" <ol style="list-style-type: none"> a. Indicator: "integration of biodiversity into national accounting and reporting systems, defined as implementation of the System of Environmental-Economic Accounting (SDG indicator 15.9.1)" b. Period: 2020 4. Monitoring element: "Trends on disclosure requirements on biodiversity risks, impacts and dependencies"

				<p>a. Indicator “Number of countries with disclosure requirements place on climate, biodiversity and other environmental related financial risks and impacts (supervised by OECD, NGFS or private sector bodies like Global Reporting Initiative (GRI))”</p>
1	6	C	63	<p>It is not clear if the proposed monitoring element “Trends in regulation of detrimental organisms and biological processes” for Goal B and component B1 includes the Biosafety issue (potential adverse impact of biotechnology on biodiversity). If it is the case, an indicator, such as” Number of completed Environmental Risk Assessment (ERA) procedures” may be proposed.</p>
1	6	A-C	72-76	<p>General comment to Goal C</p> <p>While in general, the proposed monitoring framework for Goal C contains important components, elements and indicators, the relationship among some of these components, elements and indicators remains unclear (e.g. what is the difference between the component “access to genetic resources” vs. the monitoring element “trends in access to genetic resources”? Why is “Trends in utilization of genetic resources” an element of “Sharing of benefits”?). Furthermore, any link between milestone I (“Access and benefit sharing mechanisms are established in all countries”) and the components is missing. Finally, the relationship among the components, elements and indicators of Goal C and the respective components, elements and indicators of Target 12 remains unclear. In this regard, the framework should be consistent on whether the same components, elements and indicators should be used for Goals and Targets.</p> <p>In our view, the following components or elements should be included in the framework:</p> <ul style="list-style-type: none"> - “ABS mechanisms” (additional component referring to milestone I) - “Compliance” (additional component or element of “ABS mechanisms”). Aside from “access” and “benefit-sharing”, compliance represents a fundamental pillar of ABS. <p>Furthermore, the following indicators may be particularly relevant for Goal C:</p> <ul style="list-style-type: none"> - Number of countries that have adopted legislative, administrative and policy frameworks to ensure fair and equitable sharing of benefits (indicator, SDG Indicator 15.6.1) - Total number of internationally recognized certificates of compliance published in the ABS Clearing-House (indicator for access, if access measures apply) - Total number of transfers of crop material from the Multilateral System of the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA) received in a country (indicator for access, if access measures apply) - Number of checkpoint communiqués published in the ABS Clearing-House (indicator for utilization and benefit-sharing)

1	6	B	74, 76	The monitoring element in row 74 is redundant, as it is already covered by row 76.
1	6	A	77	It is unclear what «sufficient» means, we therefore suggest to delete this term.
1	6	B	77	We would like to make an important precision, since ODA is only the concessional part of international public finance. We therefore suggest a new wording as follows: “Trends in the mobilization of financial resources from concessional public international financial flows”.
1	6-7	B-D	77-80	We suggest to add the following three additional monitoring elements and three indicators accordingly under component D1: <ol style="list-style-type: none"> 1. Monitoring element: Trends in the mobilization of financial resources from non-concessional public international financial flows <ol style="list-style-type: none"> a. Indicator: Other official flows with biodiversity relevance b. Period: Is currently reported as part of the CBD resource mobilization reporting framework 2. Monitoring element: Trends in the domestic mobilization of financial resources from private sector <ol style="list-style-type: none"> a. Indicator: International private sector flows with biodiversity relevance b. Period: Is currently reported as part of the CBD resource mobilization reporting framework 3. Monitoring element: Trends in the consistency of financial flows with a pathway towards a biodiversity net-positive development ensuring an increased resilience of nature and people <ol style="list-style-type: none"> a. Indicator: Number of countries engaged in the measurement of the consistency of financial flows b. Period: Is currently reported as part of the CBD resource mobilization reporting framework
1	6	B-D	79	We consider the differentiation between domestic and international private sector flows as important. Therefore we suggest to change the wording of this monitoring element as follows: “Trends in the international mobilization of financial resources from private sector flows” Furthermore, we would like to add a new indicator: “International private sector flows with biodiversity relevance” and also a note to the reporting period: “ Is currently reported as part of the CBD resource mobilization framework”
1	7	B-D	80	We suggest to delete this monitoring element and the corresponding indicator, as they are part of the private sector flows.
1	7	A	81-84	We suggest to have one component under the means of implementation goal for finance, one for capacity building and one for technology transfer and scientific cooperation. It is unclear to us what «sufficient» means We therefore suggest to rename component D2. as follows:

				“Availability of capacity building”. As a consequence we suggest to delete row 81.
1	7	B-D	81-82	<p>The difference between the monitoring element «trends in support to capacity building» and «trends in capacity building activities» is not clear to us. We therefore suggest to have just one monitoring element and indicator, worded as follows:</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends in capacity building activities” <ol style="list-style-type: none"> a. Indicator: “Number of countries which provide capacity building support” b. Period: “Is currently partially reported as part of the CBD resource mobilization reporting framework”
1	7	B-D	83, 84	<p>We suggest shifting the monitoring element “Trends in technology transfer” and “Trends in scientific cooperation” in rows 83 and 84 to the goal component for “technology transfer and scientific cooperation” D3.</p> <p>We would also like to add the following indicators to the monitoring elements:</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends in technology transfer” <ol style="list-style-type: none"> a. Indicator: “Number of countries which facilitate technology transfer” b. Period: “Is currently partially reported as part of the CBD resource mobilization reporting framework” 2. Monitoring element: “Trends in scientific cooperation” <ol style="list-style-type: none"> a. Indicator: “Number of countries which are engaged in scientific cooperation”
1	7	B, C	85	<p>What is a relevant or a non-relevant technology? We suggest to delete the term “relevant”. Also we suggest to add the following indicator: “Number of countries which report to have limited access to relevant technologies”</p>
2	12	C	55	<p>Switzerland considers it important to define an indicator here. It might be needed to choose an indicator that is not directly related to biodiversity.</p>
2	12-13	A-D	56-60	<p>T4.1 General comment on human health: address target 4</p> <p>When compared to the zero draft, the target was completed by adding “and safe”, and broadening the scope of the target with human health. However, a rational linking harvest, trade and use to human health is lacking.</p> <p>The component “human health and biodiversity” is not specific, measurable, achievable or time bound (SMART).</p> <p>None of the monitoring elements and indicators is directly linked to human health.</p> <p>In the light of the Covid-19 pandemic (and previous outbreaks), local markets (as a kind of trade and use) are in the focus to prevent future outbreaks, however, regulations of markets are not in the scope of biodiversity-related conventions.</p> <p>The monitoring elements have no direct linkage to human health. Further the issue of human health and biodiversity is much broader than trade and use by also encompassing pollution, cultural and</p>

				<p>spiritual values.</p> <p>Health is addressed in Target 8.</p> <p>It is therefore recommended, not to address human health and biodiversity in target 4.</p>
2	13	B, C	59	We suggest to ensure coherence with reporting by other existing mechanisms, e.g. CITES
2	13	B, C	61-63	<p>T4.2</p> <p>Based on input from UNCTAD BioTrade: We recommend adding an additional monitoring element to component T.4.2.: “Trends in exports and imports of biodiversity-based products that is sustainable (for instance in line with BioTrade Principles & Criteria and/or CITES requirements)” in order to track progress on trade flows of biodiversity-based and sustainably sourced products. This addition is needed to reflect the scope of component T.4.2 with corresponding monitoring elements.</p> <p>This additional monitoring element could be informed by the following indicators:</p> <ol style="list-style-type: none"> 1. Indicator: “Value and trends of exports/imports in biodiversity-based products “ 2. Indicator: “Share and trends of trade in biodiversity-based products that is sustainable” <p>Indicator should include: Number of Trade Agreements specifically addressing sustainable commodities or commodities requiring sustainability certification [The indicator includes bilateral and plurilateral trade agreements]</p>
2	13	B, C	62	We suggest to ensure coherence with reporting by other existing mechanisms, e.g. CITES
2	15	A-D	81-86	<p>Switzerland suggests the proposal of an additional target component and following indicators:</p> <ol style="list-style-type: none"> 1. Component: “Reduction of risks for biodiversity from pollution” <ol style="list-style-type: none"> a. Indicator: “Red List Index (impacts of pollution)” b. Indicator: “Proportion of bodies of water with good ambient water quality” <p>Furthermore we suggest to coordinate the monitoring framework for this target with the relevant MEAs in the area of chemicals and waste.</p>
2	15-16	A-C	86-88	<p>Switzerland suggests to change the wording of this component as follows: “Reduction of pollution from plant protection products and biocides” as the term biocides does not encompass all substances or chemicals with a potentially adverse effect on biota.</p> <p>Also, it is unclear what is meant with the term “excess”. Switzerland suggests to delete this term or replace it with “levels of pollution from [insert chemical] detrimental to biodiversity”</p> <p>Consequently we suggest the following monitoring elements:</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends in levels of pollution from

				<p>herbicides”</p> <ol style="list-style-type: none"> 2. Monitoring element: “Trends in levels of pollution from other plant protection products (insecticides, etc.)” 3. Monitoring element: “Trends in levels of pollution from Biocides” <p>Some of those chemical products are covered by the Stockholm Convention. For those ones, we therefore suggest the following indicators against the background of the Stockholm Convention: “Indicator for reduction of pollution from plant protection products and biocides”:</p> <ul style="list-style-type: none"> -The date on which each party has implemented measures, including legal and administrative measures, to control the production, import, export and use of persistent organic pollutants listed in Annexes A and B of the Stockholm Convention that meet or exceed the Convention’s requirements - For each chemical listed in Annexes A and B of the Stockholm Convention, changes in quantities produced, used, imported and exported for use - The number of parties with regulatory and assessment schemes for new pesticides and/or new industrial chemicals <p>It is of course very important to add indicators capturing chemicals not covered by the Stockholm Convention.</p>
2	16	A-D	91-96	<p>T 6.4</p> <p>Besides lead, other heavy metals such as cadmium and mercury should be considered as heavy metals are known to be directly toxic to biota. All heavy metals are progressively accumulated relatively high up the food chain, such that chronic exposure of lower organisms to relatively low concentrations of heavy metals can lead to the exposure of predatory organisms, including humans, to potentially harmful concentrations.</p> <p>Land degradation is often linked to informal mining or poorly regulated mining operations. For example artisanal gold mining often uses mercury and occurs in the protected areas.</p> <p>For all these reasons we suggest to add the two following monitoring elements and respective indicators:</p> <ol style="list-style-type: none"> 1. Trends in level of pollution from cadmium <ol style="list-style-type: none"> a. Indicator: Anthropogenic emissions of cadmium by sector 2. Trends in levels of pollution from mercury <ol style="list-style-type: none"> a. Indicator: Anthropogenic emissions of cadmium by sector, Minamata National Action Plan to address artisanal and small scale gold mining established
2	16	C	92	We suggest adding the following indicator: “Anthropogenic emissions of lead by sector”
2	16	C	96	We suggest adding the following additional indicator: “Hazardous waste recovered”
2	16	A-D	97-99	<p>T7.1</p> <p>Switzerland would like to propose an additional monitoring element to this component, concerning quality and quantity of biodiversity in the areas / ecosystems contributing to climate change mitigation,</p>

				adaptation and disaster risk reduction. It would read as follows: 1. Monitoring element: “Improving sustainability of ecosystems functions and services through strengthening existing policy instruments and using them strategically and synergistically in smart policy mixes with climate and disaster risk reduction policies.”
2	16-17	A	97-100	T7.1 The component does not reflect the ambition of the target as discussed during OEWG-2 (see doc. WG2020/2/4, target 6, pp. 19 ff.) Component T7.1 is not SMART A comment on the use of nature-based solutions and ecosystem-based approaches: We suggest to qualify them with "well-designed" or "sustainable" as it should be ensured that they are consistent for both biodiversity and climate protection. We suggest adapting the wording of the component as follows: “Increased biodiversity contribution of well-designed and sustainable nature based solutions and ecosystem-based approaches to climate change mitigation, adaptation and disaster risk reduction”
2	16	B	97	We suggest adapting the monitoring element as follows: “Improve scientific understanding of the carbon cycle in ecosystems taking into account anthropogenic impact and resulting trends in carbon stocks in different ecosystems”
2	16	C	97	We suggest adding the following indicator: “Strengthen the Agriculture, Forest, Land and Other Use (AFOLU) GHG inventory in Country GHG's inventories submitted under the UNFCCC and Paris Agreement”
2	16	B	98	We suggest updating the wording of this monitoring element to the following: 1. Monitoring element: “Trends in contribution to climate change adaptation and improving the methodological basis for estimating this contribution”
2	16	C	98	We suggest adding the following indicator: 1. Indicator: “Number of countries that include nature-based solutions and ecosystem-based approaches in their Adaptation Communications under the Paris Agreement”
2	16-17	0	97-100	Spelling: we suggest correcting the word approached to approaches as it affects the overall meaning of the text.
2	16	B	99	We suggest updating the wording of this monitoring element to the following: “Trends in contribution to disaster risk reduction and improving the methodological basis for estimating this contribution”
2	17	A	101-102	The component does not reflect the ambition of the target as discussed during OEWG-2 (see doc. WG2020/2/4, target 6, pp. 19 ff.) Component T7.2 is not SMART

2	17	C	101	Indicators should include not only developing countries but all the others, like for example OECD countries that have to report on trends how to integrate biodiversity into mitigation, adaptation and DRR projects through either their NDCs or similar strategies.
2	17	B, C	101	We suggest to change the monitoring element and indicator as follows: <ol style="list-style-type: none"> 1. Monitoring element: “Trends in integration of biodiversity consideration in design of mitigation, adaptation and disaster risk reduction policies / measures <ol style="list-style-type: none"> a. Indicator: “Number of least developed countries and small island developing States with nationally determined contributions, long-term strategies, national adaptation plans, strategies as reported in adaptation communications and national communications (SDG indicator 13.b.1) b. Indicator: “Number of countries who include biodiversity protection in their domestic climate policies , adaptation strategies including Adaptation Communications under the Paris Agreement, and national disaster risk reduction strategies in line with the Sendai Framework for Disaster Risk Reduction 2015–2030”
2	17-18	A	103-116	T 8 The monitoring elements and indicators of target 8 need to be consistent with those of target 4. Sustainable tourism should be added as an additional monitoring element/component.
2	20	A	117-126	T 9 In order to cover the scope of target 9 with the components of this target and the related monitoring elements and indicators, they should reflect productivity, food security and nutrition, sustainable use and resilience of managed ecosystems.
2	20	A	117-123	T 9.1 We suggest to reformulate the component T9.1. as follows: “Sustainable management of agricultural biodiversity, including soil biodiversity, pollinators and other associated biodiversity, cultivated plants and farmed and domesticated animals and their wild relatives”
2	20	B, C	117-123	Additional monitoring element proposed: <ol style="list-style-type: none"> 1. Monitoring element: “Change in trends in the use of natural pest controls” <ol style="list-style-type: none"> a. Indicator: “Application of integrated pest management”
2	20	B	117-119	We suggest using ‘sustainable management’ rather than ‘practices’.
2	20	B	121	Please specify as follows: “Trends in abundance and variety of pollinators”
2	21	C	126	From a sustainable management perspective, sustainable management can also take place outside of areas managed under certification schemes. This indicator should be complemented with information provided through national reporting.
2	21	A, B	127-131	The challenge of this target is the distinction to targets 7 and 11 and

				<p>consistency with Goal B. One way around it is not to focus the target on the ecosystem services but on the application of nature-based solutions (NbS) / the ecosystem approaches when improving air quality, reduce disaster risks and ensure freshwater supply. The monitoring elements should be reformulated accordingly. For instance,</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends in investments in NbS / ecosystem approaches to improve air quality” 2. Monitoring element: “Trends in government efforts to reduce disaster risks with NbS / ecosystem approaches”. <ol style="list-style-type: none"> a. Indicator: “Proportion of investments in NbS in total DRR expenditures”
2	21-22	A-C	132-139	<p>T11</p> <p>Urban management and city planning need to make biodiversity a priority. The benefits are well known and multifold. Green spaces are the backbone of urban quality, but planning should also include streets, architecture, suburban areas and extent to ecosystem services/NCPs from outside of the city.</p> <p>Additional monitoring elements should include:</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends in establishing green/blue spaces” 2. Monitoring element: “Biodiversity quality of such spaces” 3. Monitoring element: “Recreational and educational value of such spaces” <p>The respective indicators should be developed to specify. One such indicator could be:</p> <ol style="list-style-type: none"> 1. Indicator: “Number of cities or other urban entities with green space management plans, dedicated budgets and monitoring frameworks in plan”
2	22	A	133-139	<p>T11.2</p> <p>There needs to be a new indicator that measures the number of zoonosis outbreak.</p>
2	22	B	133	<p>The term “Essential services” is too vague and should be specified to the following wording: «for the human health and well-being»</p>
2	22	B	133-139	<p>T 11.2</p> <p>We propose a new monitoring element:</p> <ol style="list-style-type: none"> 4. Monitoring element: “Trends in contribution to human health and well-being of natural landscapes, in particular Mountain Ecosystems” <p>Mountains do represent about 25% of the tourist destinations but are also increasingly recommended as destination by health practitioners (for allergies, quality of air, exercise, mental conditions). Mountains also host a large number of sacred/religious locations (pilgrimages, temples, sacred mountains, sacred volcanos, etc.) Covid-19 crisis has increased this trend of seeing mountains as healthy destinations and it is likely that these roles and functions will increase.</p>
2	22-25	A-C	140-151	<p>T12</p> <p>As for Goal C, the proposed monitoring framework for Target 12 contains important components, elements and indicators, but the relationship among some of these components, elements and</p>

				<p>indicators, as well as the relationship to the respective components, elements and indicators of Goal C remain unclear.</p> <p>Similar to the monitoring framework for Goal C, we suggest including the additional components and/or elements “ABS mechanisms” and “compliance” (since aside from “access” and “benefit-sharing”, compliance represents a fundamental pillar of ABS).</p> <p>Regarding “benefit-sharing” in Target 12 it is unclear whether the “benefits” considered are only monetary benefits or if also non-monetary benefits are considered.</p> <p>Moreover, the following indicators may be particularly relevant for Target 12:</p> <ul style="list-style-type: none"> - Number of countries that have adopted legislative, administrative and policy frameworks to ensure fair and equitable sharing of benefits (indicator, SDG Indicator 15.6.1) - Total number of internationally recognized certificates of compliance published in the ABS Clearing-House (indicator for access, if access measures apply) - Total number of transfers of crop material from the Multilateral System of the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGRFA) received in a country (indicator for access, if access measures apply) - Number of checkpoint communiqués published in the ABS Clearing-House (indicator for utilization and benefit-sharing) - Contribution of benefits to conservation and sustainable use (element of benefit-sharing, indicator to be defined)
2	24-25	A, B	150-151	<p>T 12.3</p> <p>An analogous structure of components and monitoring elements could be used for ABS for traditional knowledge associated with genetic resources as outlined in the comment to T 12.2 for genetic resources.</p>
2	25	A	150	<p>For consistency, the formulation should be “Benefits <i>shared</i> from the use of ...” rather than “Benefits <i>resulting</i> from the use of...”.</p>
2	25	B	152	<p>“Planning” refers mainly to economic and settlement development strategies. Not all states know such instruments. Switzerland would suggest to use a more inclusive term.</p>
2	25	C	152	<p>NBSAPs should contain a “mainstreaming” target in particular in the field of development planning.</p> <p>All the methodologies for TEEB, Nature Capital, nature’s contribution to people(IPBES) or «Encore» aim at measuring values of biodiversity/ecosystems services and claim to take this value into account in the national accounting and in the planning processes. It is important that we agree on a clear and hopefully simple methodology to measure value.</p> <p>We consider sub-indicator a of the SDG indicator 15.9.1 to be more</p>

				relevant than sub-indicator b.
2	25	C	153	We consider this indicator not as relevant for this monitoring element and suggest deleting row 153.
2	26	B	154	Not all countries have state run development processes.
2	26	C	154	We suggest adding the following indicator: “Number of countries with mechanisms in place to enhance policy coherence of sustainable development (SDG indicator 17.14)”
2	26	B	155	Not all states have (domestic) poverty reduction strategies
2	26	C	155	We suggest adding the following indicator: “Ratio of number of countries which have included biodiversity and ecosystem service values into their poverty reduction strategies over number of countries which have a poverty reduction strategy”.
2	26	B	156	The sectors should be defined. The methodology to measure the value of ecosystem services has to be defined and standardized to achieve comparable figures.
2	26	C	156	We suggest adding the following indicator: “Number of countries which have integrated biodiversity and ecosystem service values into any sectoral plan”.
2	26	A	157-158	T13.2 What is meant by “other accounts”? We suggest changing the wording as follows: “Biodiversity reflected in national accounts”.
2	26	C	157	We consider sub-indicator a of the SDG indicator 15.9.1 to be more relevant than sub-indicator b.
2	26	B	158	Which accounts are meant by other accounts? In our understanding for this goal only national accounts are relevant. We therefore suggest deleting row 158.
2	27	B-D	159	We suggest deleting this row and replacing it with what is proposed in row 160.
2	27	A-D	159-161	General policies and regulations are reflected above in T13.1. Therefore we suggest to change the wording of T13.3 as follows: “Biodiversity values are reflected in environmental impact assessments and strategic environmental assets”.
2	27	B-D	160	We suggest to change the wording of this monitoring element and also propose a new indicator to it as follows: 1. Monitoring element: “Trends in the incorporation of biodiversity considerations into environmental impact assessment” a Indicator: “Number of countries which incorporate biodiversity considerations into environmental impact assessment”
2	27	B	161	We consider this to be a very complicated monitoring element. It is unclear what is meant by it and how it is relevant to monitor the

				<p>target.</p> <p>Additionally, we suggest to clarify the difference between EIA and strategic EIA.</p>
2	27	C	162	<p>In general, Switzerland favors the use of an indicator that compares the footprint of production/consumption and the ecological limits. But the post-2020 GBF should adopt one clear standardized methodology that parties should apply.</p>
2	27-30	A-C	162-179	<p>Based on input from UNCTAD BioTrade: Making supply chains sustainable will only work when trade becomes sustainable. Trade should be explicitly mentioned under one of the components of the 2030 target, ideally as additional component T14.4.: Supply chains promote sustainable trade</p> <p>Accordingly, the shift to sustainable trade should be reflected as a monitoring element under the new component T14.4.: “Trends in efforts to shift to sustainable trade”</p> <p>We propose the following indicators for that additional component 14.4:</p> <ol style="list-style-type: none"> 1. Indicator: “Number of Countries supporting Business Support Organizations (governmental Trade Promotion Organizations but also private sector association) in exporting products produced under sustainable criteria, such as BioTrade P&C” 2. Indicator: “Number of companies that have incorporated the BioTrade Principles & Criteria into their business practices” 3. Indicator: “Trends of trade and commercialization in biodiversity-based products that is sustainable (for instance, in line with BioTrade Principles and/or CITES requirements”
2	27	A-C	162-166	<p>We also suggest adding the following additional indicator under T14.1:</p> <ol style="list-style-type: none"> 1. Indicator: “Financial alignment of finance and real economies”
2	27	B, C	162-166	<p>Switzerland proposes a re-ordering and also suggests to add two additional monitoring elements. The proposal for rows 162-166 would read as follows:</p> <ol style="list-style-type: none"> 1. Monitoring Element: “Trends in ecological limits reached or surpassed” <ol style="list-style-type: none"> a. Indicator: “Ecological Footprint” (Row 162) b. Indicator: “Human Appropriation of Net Primary Production (HANPP)” (Row 163) c. Indicator: “Change in water use efficiency over time (SDG indicator 6.4.1) (Row 165 to 164) 2. Monitoring Element: “Trends in consumption patterns affecting biodiversity” <ol style="list-style-type: none"> a. Indicator: “Domestic material consumption, domestic material consumption per capita, and domestic material consumption per GDP (SDG indicators 8.4.2 and 12.2.2)” (Row 164 to 165) 3. Monitoring element: Trends in the level of water stress affecting biodiversity <ol style="list-style-type: none"> a. Indicator: “Level of water stress: freshwater

				withdrawal as a proportion of available freshwater resources (SDG indicator 6.4.2)” (Row 166)
2	28	C	167	Switzerland considers this the most relevant indicator for this monitoring element.
2	28	C	168	Switzerland does not consider this indicator to be directly biodiversity relevant, therefore we suggest it to be deleted.
2	28	C	169	We suggest deleting this indicator as Switzerland considers the SDG indicator in row 170 to be more precise.
2	28	C	170	This might be a relevant indicator in combination with SDG Indicator 12.1.1 therefore we could accept two indicators for this monitoring element.
2	28	C	171	We suggest either deleting this indicator or introducing a monitoring element on sustainable production with relation to the water sector.
2	28	C	172	This indicator reads like a duplication of row 167 therefore we suggest deleting it.
2	29	C	173	We do not consider this a relevant indicator and therefore suggest to delete it.
2	29	B	175	We would need a clear definition to assess it.
2	29	C	176	<p>Information on hazardous waste generated and the proportion of hazardous waste treated (by type) is important – we support this indicator.</p> <p>It would be good to have additional indicators, such as <u>separate collection of specific hazardous waste</u>, for example electrical and electronic scrap. At the national level Switzerland applies this indicator and it is also used by other countries.</p> <p>Separate collection of electrical and electronic scrap: Electrical and electronic appliances largely consist of metal, plastic and glass components. From an ecological point of view, recycling these materials makes good sense because their multiple re-use means reducing the consumption of resources. Furthermore, professional disposal prevents pollutants such as those contained in batteries and accumulators, capacitors and cooling appliances from entering the environment.</p> <p>Furthermore it would be good to have information/an indicator about <u>landfilled waste</u>.</p>
2	29-30	A-C	177-179	<p>T14.3</p> <p>As we consider the monitoring element in row 178 as very important we suggest adding a new target component based on the monitoring element of row 178 reading as follows: “Reduction of net-negative and increase of net-positive impacts of the financial sector on biodiversity”</p> <p>Consequently the following two monitoring elements and indicator would be included:</p> <ol style="list-style-type: none"> 1. Monitoring element: “Trends by financial sector in developing and applying biodiversity risk assessment

				<p>policies and processes, demonstrating decreasing negative impacts on ecosystems and biodiversity in their portfolios”</p> <p>a. Indicator: “Number of countries with disclosure requirements in place on climate, biodiversity and other environmental related financial risks and impacts (supervised by OECD, NGFS or private sector bodies like Global Reporting Initiative (GRI)”</p> <p>2. Monitoring element: “Trends in the development of tools for biodiversity financing, demonstrating increasing amounts of dedicated finance”</p>
2	29	C	177	<p>Under target component 14.3, the component ‘trends in certification of supply chains’ we are of the view that the indicator proposed here ‘Area of forest under sustainable management: total FSC and PEFC forest management certification’ is not suitable for this monitoring element. Certification of supply chains is very general also. A possible indicator could be developed in relation to countries who require or promote the application of certification schemes which include biodiversity criteria.</p>
2	30	C	179	<p>Indicator is not very well fit since it only covers fisheries sector and not any other sectors. We suggest adapting the indicator to all sectors.</p>
2	30-31	A	180-189	<p>T 15.1</p> <p>This component should be made more biodiversity-specific and actionable. Example: Minimizing of impact of consumption including private consumption, public procurement and supply chains on biodiversity.</p> <p>At least the link between indicators and target has to be clarified.</p>
2	30-31	B	180-184	<p>This monitoring element would be more meaningful if trends in biodiversity-respecting use of non-renewable natural resources would be monitored. Of course, the indicators need to be made more specific.</p>
2	31	B	187	<p>It is not clear how this monitoring element relates to proposed target 15. The type of use of biological resources should be specified. We suggest “Trends in unsustainable use of biological resources”. Alternatively, as there is no indicator and as the other monitoring elements are already quite defined, this element could be deleted.</p>
2	30	C	187	<p>A suitable indicator would have to be identified.</p>
2	31	B	193	<p>Alternative formulation for ‘environmentally friendly: ‘products which are produced in a biodiversity friendly way’</p> <p>An additional monitoring element could be: ‘Trends in biodiversity-based including organic products’. This includes also tourism products for example.</p>
2	32	C	194-197	<p>To include comprehensively the emerging issues in the domain of modern biotechnology, we propose to complete the list of indicator with the following indicator:</p> <p>1. Indicator: “Percentage of Parties that have the necessary biosafety legal and administrative measures regarding</p>

				genome editing and/or synthetic biology”.
2	32-33	C	198-204	On our view recording and sharing non-compliance cases is an appropriate measure to prevent and control adverse impacts of biotechnology on biodiversity and human health. We propose to complete the component T16.3 with the following indicator: 1. Indicator: “Percentage of parties with mechanisms to notify non-compliance cases and emergency measures”.
2	33	C	205-206	Several countries don’t differentiate between taxes and charges and fees which leads to the thought to have only one indicator per monitoring element. Switzerland therefore suggests to delete the indicator in row 206 and replace it with one indicator reading as follows: “Number of countries with biodiversity relevant taxes, charges and fees” in row 205.
2	33	C	208	The indicator should reflect harmful subsidies to biodiversity in different government sectors. Switzerland suggest to extend when possible, the scope beyond agricultural subsidies to fishery and forest plantation subsidies.
2	34	C	209	Monitoring fossil fuel subsidies is not a priority in this context – not biodiversity specific enough. Focus should be on the indicator of line 208. Switzerland suggests to delete this indicator.
2	34	C	210	Monitoring fossil fuel subsidies is not a priority in this context – not biodiversity specific enough. Focus should be on the indicator of line 208. Switzerland suggests to delete this indicator.
2	34	B-D	211	We suggest changing the wording of this monitoring element to the following: 1. Monitoring element: “Trends in the number of countries which have assessed the value of biodiversity in accordance with the convention” Therefore also the wording of the indicator would be changed to: a. Indicator: “Number of countries that have assessed values of biodiversity in accordance with the convention (decision X/3)” The period would be adjusted to b. Period: “Is currently reported as part of the CBD resource mobilization reporting framework” Consequently we would like to add two more monitoring elements with respective indicators within T18.1: 1. Monitoring element: “Trends in the number of countries which have identified and reported their funding needs, gaps and priorities” a. Indicator: “Number of countries that have identified and reported funding needs, gaps and priorities (decision X/3)” b. Period: “Is currently reported as part of the CBD resource mobilization reporting framework” 2. Monitoring element: “Trends in the number of countries which have developed national financial plans for biodiversity to meet the reported funding needs and priorities”

				<ul style="list-style-type: none"> a. Indicator: “Number of countries that have developed national financial plans for biodiversity (decision X/3)” b. Period: “Is currently reported as part of the CBD resource mobilization reporting framework”
2	34	A	211	The funding gap is crucial as it is the reflection of funding needs matched with available resources. Therefore, we suggest changing the wording to the following: “Identification of funding gap and priorities to meet ambition of the goals and targets of the framework”
2	34	C	211	This reflects various very different indicators and monitoring elements in one. We therefore suggest to split it up in multiple monitoring elements.
2	34-35	A-D	212-218	<p>Switzerland suggests adding an additional monitoring element to this component:</p> <ul style="list-style-type: none"> 1. Monitoring element: “Trends in the mobilization of financial resources from non-concessional public international financial flows” <ul style="list-style-type: none"> a. Indicator: “Other official flows with biodiversity relevance” b. Period: “Is currently reported as part of the CBD resource mobilization reporting framework”
2	35	B	212	ODA is only one part of the picture and only reflects the concessional part of international public finance, we therefore suggest changing the wording to: “Trends in the mobilization of financial resources from concessional public international financial flows”
2	35	C	213	This indicator is not available related to biodiversity relevance and is therefore not suitable. Switzerland suggests to delete this indicator.
2	35	C	214	This indicator is not available related to biodiversity relevance and is therefore not suitable. Switzerland suggests to delete this indicator.
2	35	C	215	This indicator is partially overlapping with the indicator on biodiversity relevant ODA and OOF. Switzerland suggests to delete this indicator.
2	35	C	216	This indicator is 100% overlapping with the indicator above on biodiversity relevant ODA and OOF. Switzerland suggests to delete this indicator.
2	35	B-D	217	<p>If the target component is differentiated between «international» and «domestic» then the monitoring elements will also have to be differentiated along the same lines.</p> <p>To begin with we suggest to adapt the wording of the monitoring element as follows: “Trends in the international mobilization of financial resources from private sector flows” the indicator we suggest could read as follows: “International private sector flows with biodiversity relevance”. The period could be described “Is currently reported as part of the CBD resource mobilization reporting framework”</p>
2	35	C	218	Fully overlaps with monitoring element on private sector flows,

				Switzerland therefore suggests to delete this monitoring element
2	36	B-D	220	Switzerland suggests to adapt this monitoring element and indicator as follows: <ol style="list-style-type: none"> 1. Monitoring element: “Trends in the domestic mobilization of financial resources from private sector” <ol style="list-style-type: none"> a. Indicator: “Domestic private sector flows with biodiversity relevance” b. Period: “Is currently reported as part of the CBD resource mobilization reporting framework”
2	36	B	221	Fully overlaps with monitoring element on private sector flows. Switzerland suggests to delete this monitoring element.
2	36	B	223	Include only one monitoring element on capacity building. The difference to the monitoring element in row 222 is not clear. Switzerland suggests an indicator reading as follows: <ol style="list-style-type: none"> 1. Indicator: “Number of countries which provide capacity building support” and a period reading as follows: “Is partially reported as part of the current resources mobilization reporting framework”
2	36	B, C	224	This SDG indicator is for development support in general and is not available for biodiversity relevant approved funding. Therefore it is not suitable for the CBD Monitoring Framework We suggest to change the indicator to the following: <ol style="list-style-type: none"> 1. Indicator: “Numbers of countries which facilitate technology transfer” and the period to this:” Is partially reported as part of the current CBD resource mobilization reporting framework”
2	36	C, D	225	Switzerland suggests to add the following indicator and period: <ol style="list-style-type: none"> 1. Indicator: “Number of countries which are engaged in scientific cooperation.” 2. Period: “Is partially reported as part of the CBD national report.”
2	37	C	234-235	These indicators are exactly repeated. We suggest deleting row 235.
2	38	A	239-248	While it is important to monitor trends in the participation of IPLCs, women and girls, as well as youth, it is equally important to ensure participation of civil society organizations in decision making when it comes to biodiversity. Adding such a component is very critical.
2	38-40	B	239-245 and 247	These trends are formulated in a very general way and should be specific to biodiversity-related decision-making. Two examples: The trends of the extent to which civil society are consulted, for instance in NBSAP revision and implementation should be monitored. Also, Trends in Access to information, Public Participation and Access to Justice in Environmental Matters (to use wording of the Aarhus Convention but can be made more specific here) should be monitored. Related indicators will need to be established. This information can be provided by countries through national reporting.
2	38	C	240	We see a challenge to get accurate figures from all countries by using this indicator. The term “population group” needs to be defined in a way that makes it relevant and applicable to all countries.

2	39	C	243	We see a challenge to get accurate figures from all countries by using this indicator. The term “population group” needs to be defined in a way that makes it relevant and applicable to all countries.
2	39	C	244	We support the use of existing SDG-indicators to measure “trends in the participation of women and girls in decision making”

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