|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** | | | | |
| ***Contact information*** | | | | |
| **Surname:** | **ALHAYEK** | | | |
| **Given Name:** | **BELAL** | | | |
| **Government** (if applicable)**:** |  | | | |
| **Organization:** | **MINISTRY OF LOCAL ADMINISTATION AND ENVIRONMENT** | | | |
| **Address:** | **Yousef Azmah Sq. Salhia-Damascus** | | | |
| **City:** | **Damascus** | | | |
| **Country:** | **SYRIAN ARAB REPUBLIC** | | | |
| **E-mail:** | [**Blalhayek75@gmail.com/bilal.alahyek@hotmail.com**](mailto:Blalhayek75@gmail.com/bilal.alahyek@hotmail.com) | | | |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
| 1 | 4 | B | 36 | As highlighted in the general comments, it is encouraging to see that the trends in the diversity of wild species has been included. Some of the indicators that can be used to measure it include; the number of populations within species with an functional population size; the proportion of populations maintained within species; the number of species and populations in which genetic diversity is being monitored using DNA based methods (<https://doi.org/10.1016/j.biocon.2020.108654>) |
| 2 | 10 | C | 35 | Does the protected areas referred in this line mean terrestrial protected areas, given that marine protected areas seem to be accounted for separately in row 36 below? There is need to explicitly specify if the intention in row 35 is all protected areas or only terrestrial ones. |
| 2 | 17 | C | 101 | Whilst we appreciate that LDCs and SIDS are the most affected by the impacts of climate change, all countries should be able to develop nationally determined contributions and long term strategies for adaptation and mitigation of climate change impacts. Unless an additional monitoring element on mitigation is added with its own standalone indicators, the current indicator must be changed to include all countries. |
| 2 | 18 | C | 108 | Proposed edits to the indicator  “*MCS certified catch as a percentage of total catch*” rather than an absolute number. |
| 2 | 19 | B | 114 | Proposal to include “*flora”* in the monitoring element,as both the target T8.2. and the indicators consider both fauna and flora. |
| 2 | 8 | B | 1 | Correct the monitoring element that currently reads “Trends in area under spatial land-use plans” to say “Increase in area under spatial land-use plans” |
| 2 | 10 | C | 30-34 | We must ensure that when it comes to “trends in habitat connectivity”, the indicators do not leave out marine protected area connectivity.  Large MPAs that encompass multiple habitats, or networks of MPAs that protect migratory pathways and key habitats, can also ensure population connectivity (Boerder et al, 2018). This helps build additional resilience into a changing system through providing refuge for highly migratory species whilst allowing for species’ range shifts.  Perhaps the WDPA may be consulted on the best indicator to use for this. |
| 2 | 16 | C | 97 | For indicators, please note that large MPAs (including offshore) can be considered as a measure of climate change adaptation. They can, for example, support shifting species ranges thus supporting fisheries resilience etc.) |
| 2 | 17 | C | 101 | When considering indicators for this section, please keep in mind that a strong body of scientific literature supports the use of coastal MPAs as a climate change adaptation tool (Sutton-Grier et al, 2015). Intact coastal ecosystems such as coral and oyster reefs, seagrasses, wetlands and mangroves can attenuate climate threats such as extreme weather events, sea level rise, and erosion, making coastal communities more resilient to climate change. Such ecosystems remain intact if threats such as overharvesting, dredging, and coastal development are restricted within protected areas – assuring their continued functionality against climate impacts. |
| 2 | 33 | C | 205-206 | For the indicators, consider reflecting here that there are other forms of incentives like: tax exemption, preferential interest rates, handouts, income support, transfer of technology, education, etc. |
| 1 | 3 | B | 29 | The indicator used, with birds and mammal extinctions highlighted assumes that only fauna can be used to determine extinction rates. There should be other indicators that can be used to show species extinction, bearing in mind that habitat loss is also a measure of species extinction. We therefore need much deeper thought about how we can estimate the extinction rate properly to improve the science behind conservation planning. |
| 1 | 6 | B | 74 | Whilst appreciating the elements of the target, we believe that other elements that are important in the targets are not being measured in this target. The fair and equitable sharing is of particular importance and therefore appropriate indicators need to be identified that will measure fair and equitable in the target. |
| 2 | 8 | C | 2 | The indicators proposed seem not to be related to the monitoring elements; perhaps these are related to line 3 and 4? |
| 2 | 12 | B | 48 | The used indicator does not relate very well with the monitoring element presented in this regard. When one considers the monitoring element, it is more focused on the proportion of protected areas (either marine, freshwater, terrestrial) under various governance regimes. Furthermore, the proposed indicator on certified forestry relates to forest management, which should not be equated with protected areas. |
| 2 | 16 | A | 97-99 | Whilst appreciating the importance of biodiversity (species, ecosystem and genetic) in climate change mitigation, the monitoring elements and corresponding indicators could be more explicit about certain types of habitats that make specific contributions, for example, indicators that provide for the trend in mangroves, sea grass, reefs, saltmarshes and wetlands given their contribution to climate regulation and coastal flood prevention. |
| 2 | 19 | C | 110 | Proposal to extend red list index to all marine mammals in addition to albatrosses and large petrels. |
|  | | | | |
| 2 | 8 | A | 1-5 | Planning (and MSP) does not necessarily equate to beneficial use change. The target must also focus on non-degradation and restoration. Therefore T1.2 is critical. Otherwise you risk incentivizing a managed decline in biodiversity  Additionally, land and sea spatial planning should include among its goals to protect nature, support sustainable use, etc….otherwise that MSP does not really belong in this framework. Here is one suggested edit to Target 1:  “By 2030, [50%] of land and sea areas  globally are under nature-inclusive (and/or nature positive) spatial planning….” |
| 2 | 10 | Target | 35-38 | In the text of Target 2, we recommend adding the following language:  *“By 2030, protect and conserve through well connected and effective systems of protected areas and other effective area-based conservation measures at least 30% of the planet, allowing no industrial extraction or activities, with the focus on areas* *particularly important for biodiversity and ecosystem services.”*  The world has come to the view that such activities inside, adjacent to or affecting (M)Pas are not compatible and must no longer be allowed to happen if we are serious about stemming the decline in biodiversity. This addition gets at the point that the “at least 30%” should be a special area where nature can be found in its natural state without destructive activities, otherwise such areas becomes simply “managed areas” versus “protected or conserved areas”. Emphasis on *industrial* means that local community use and subsistence use may be permitted in some protected areas.  We recommend adding the words “and ecosystem services” as this would enable the carbon angle and cross working with the UNFCCC to secure carbon stores etc. |
| 2 | 12 | C | 56 | We note a bycatch related monitoring element is included under Target 8, but it also belongs here if we are talking about sustainable and safe harvest. Suggest including this monitoring element here as well: “Trends in population and extinction risk in bycatch species”  Another example of harvest that is unstainable and harmful is when it uses bottom trawling, dynamite fishing. Perhaps one indicator to add here is as follows:  “Increase in legislation prohibiting destructive fishing activities such as bottom trawling and dynamite fishing, etc. |
| 2 | 33 | Target | 205 | With respect to Target 17, we recommend removing the word “most” in front of harmful. Just as in the Zero Draft, this version has shifted away from a much stronger call (in Aichi target 3) to eliminate all harmful subsidies to the “most harmful” ones.  Furthermore, this becomes a definitions challenge for what constitutes THE MOST harmful. Just determining a list of “harmful” subsidies is already difficult. |
| 2 | 33 | B | 205-206 | Recommend editing monitoring element as follows:  “Trends in development and application of public incentives that ~~promote~~ ensure biodiversity conservation and sustainable use” |
| 2 | 33 | C | 205-206 | Add an additional monitoring element:  “Trends in implementation and enforceability of public incentives that promote biodiversity conservation and sustainable use” |
| 2 | 33 | B | 207 | Recommend the following edit: “Trends in development and application of private incentives that ~~promote~~ ensure biodiversity conservation and sustainable use.” |
| 2 | 33 | C | 207 | Add an additional monitoring element:  “Trends in implementation and enforceability of private incentives that promote biodiversity conservation and sustainable use.” |
| 2 | 33 | D | 205-209 | Why are some baselines set to 2019 and some to 2020? Can we say 2020 for consistency? |
| 2 | 33 | B | 208 | This is a quantitative assessment. Recommend adding a qualitative monitoring element as well:  “Trends in subsidies policy reform through legislation or regulation”.  This can be done through mechanism like the Trade Policy Monitoring of the WTO. |
| 2 | 33 | 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” |
| 1 | 6 | B | 64 | Whilst we appreciate the monitoring elements, we would like to highlight that they should be renewable biological resources to ensure the indicator does not encourage uses of biological resources that are damaging to biodiversity e.g. deforestation, monoculture plantations for biofuels. |
| 1 | 6 | B | 68 | An additional element to be measured could be trends in wildlife tourism. The World Bank 2018 report could be used as a baseline for measuring extent of wildlife tourism, see <http://hdl.handle.net/10986/29417> |
| 2 | 12 | B | 55 | Whilst we appreciate the need to measure reduction in human wildlife conflicts, we are of the view that this will be difficult to measure at the global level. Even though some countries keep track of human deaths because of wildlife and problem animals killed or otherwise dealt with, these are often collected locally and not sure how they can be collated to provide a global picture that significantly addresses the issue at hand. |
| 2 | 13 | B | 62 | One possible indicator that could be used is “*the number of Non Detriment Findings for CITES listed species”.* However, IFAW notes that while NDFs may be in place this does not necessarily guarantee sustainability, depending on the quality of the NDF. But it at least provides for a starting point and synergistic implementation of both conventions. |
| 1 | 2 | B | 25-26 | In addition to “Trends in fragmentation and quality of other marine and coastal ecosystems”, we recommend adding a monitoring element on interconnectivity of marine protected areas, which is critical, for example, for the protection of highly migratory species. The WDPA may be used to assess this. |
| 2 | 8 | B | 6-11 | Sea ice is an important habitat for many polar species. Suggest adding the following monitoring element in Column B: "Trends in sea-ice" and the following indicator: “Sea Ice Area and Condition (part of Ocean Health Index)” |
| 2 | 8 | B | 6-11 | We recommend adding trends in ecosystem integrity as a monitoring element with the following new indicator: “Ecosystem Integrity” (found within Ocean Health Index) |
| 2 | 15 | C | 89 | Indicator (a) is formatted to suggest that coastal eutrophication is an indicator of plastic pollution – whereas it is an indicator of pesticides/herbicides. Therefore indicator (A) needs moving up to T6.2 |
| 2 | 16 | A | 97-99 | Recommend adding this text: T7.1. Increased biodiversity and habitats contribution to climate change mitigation, adaptation and disaster risk reduction.  “Habitats” includes mangroves, salt-marshes for example |
| 2 | 16 | C | 97 | It may be useful to add indicators that measure “Trends in carbon stocks” in mangroves, seagrasses, and saltmarshes.  Also, for consideration:  To ascertain whether an oceanic system can be incorporated in climate mitigation polices the following information is required (Howard et al, 2017):  1. Carbon sequestration rate;  2. Current carbon stocks, including the stability and permanence of those stocks (i.e. how will those stocks be affected if the system is degraded or destroyed?);  3. Geographic area;  4. Anthropogenic drivers of system loss leading to carbon emissions or removals; and  5. Emission rates from both degraded and intact states. |