

Dr. Cristiana Paşca Palmer
Executive Secretary
Secretariat of the Convention on Biological Diversity

ICLEI Cities Biodiversity Center
Cape Town, South Africa
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Dear Dr. Paşca Palmer

ICLEI - Local Governments for Sustainability comments on the Post-2020 GLOBAL BIODIVERSITY FRAMEWORK: Discussion Paper

It is with pleasure that I am hereby submitting initial comments on the “Discussion Paper” regarding a Post-2020 Global Biodiversity Framework on behalf of ICLEI – Local Governments for Sustainability in response to your invitation to do so by today.

The document is structured as follows:

- 1 Background
- 2 ICLEI’s Initial Comments on the CBD Discussion Paper, CBD/POST2020/PREP/1/1)
- 3 Concluding remarks

1 Background: Adoption of key CBD COP Decisions

ICLEI - Local Governments for Sustainability is the world’s largest global network of more than 4500 local and subnational government members, their networks and network cities, committed to sustainable development, supported through our 22 offices and represented by our elected executive global leadership in more than 124 countries. ICLEI was founded “by cities for cities” at the UN in New York, ahead of the Rio Convention in 1990 whereupon we played a significant role in the global mobilisation for, and uptake of, Local Agenda 21.

Building on this, ICLEI has a proud history and tradition of representing the voice of local and subnational governments within the UN Convention forums and processes. For instance, we are the designated LGMA (Local Government and Municipal Authorities) Focal Point to the UNFCCC and has been looked towards for our leading advocacy role on behalf of local and subnational governments in relation to climate change since the UNFCCC COP1.

The **ICLEI Cities Biodiversity Center** (ICLEI CBC), based in Cape Town, South Africa, has a global mandate to act on behalf of ICLEI to direct, coordinate, mobilise and build our biodiversity and nature advocacy efforts, programmes and implementation projects. Since the CBD COP 11 held in Bonn, Germany in 2008, ICLEI, in close partnership with the Secretariat of the CBD, has convened six successive **Global Biodiversity Summits of Local and Subnational Governments** as official high level parallel events to the CBD COPs, to enable the active engagement of local and subnational governments with CBD Parties and other stakeholders.

ICLEI - Local Governments for Sustainability is the leading global network of over 1,500 cities, towns and regions committed to building a sustainable urban future.

By helping the ICLEI Network to become sustainable, low-carbon, ecomobile, resilient, biodiverse, resource-efficient, healthy and happy, with a green economy and smart infrastructure, we impact over 25% of the global urban population.

ICLEI- Local Governments for Sustainability Cities Biodiversity Center

Physical Address
Knowledge Park III, Heron
Crescent, Century City, Cape
Town, 7441

Postal Address
PO Box 5319, Tygervalley, 7536
South Africa

Phone
+27 21 202 0393
+27 84 200 0110

Website
<http://www.iclei.org>

Non Profit Company (NPC)
VAT No. 4400266807
Reg. No. 2002/007758/08
PBO No. 930 032 155

These Summits have resulted in strong political and technical outcomes, such as the **Nagoya Plan of Action on Subnational Governments, Cities and Other Local Authorities for Biodiversity (2011 - 2020)** adopted at COP 10 in 2010, the **Quintana Roo (2016) and Sharm El-Sheikh (2018) Summit Communiqués** supporting a consecutive number of **COP Decisions on local and subnational governments** adopted at successive CBD COPs since 2008. These outcomes and the many associated programmes, initiatives, tools, actions, platforms and partnerships emerging from these interventions pay testimony to the increasingly recognised and indeed, vital role that local and subnational governments and their networks fulfil in contributing to the three objectives of the Convention and the attainment of the Aichi Biodiversity Targets.

The following Decisions demonstrate the consequent and consecutive order of Decisions adopted at the CBD COPs addressing increased recognition of local and subnational governments and their networks towards the collective achievement of the 2050 Vision “Living in Harmony with Nature by 2050”:

Decision IX/28, adopted at COP 9 in Bonn in 2008, was the first decision on local and subnational governments to be adopted under a United Nations multilateral environmental agreement. This was followed by the unique and ground-breaking Decision X/22, adopted at COP 10 in Nagoya in 2010 which included a **10-year Nagoya Plan of Action on Subnational Governments, Cities and Other Local Authorities for Biodiversity (2011-2020), that in a sense was an early localisation of key aspects of the Strategic Plan for Biodiversity 2011-2020, which has since then, been guiding the Convention during the current decade.** This Decision taken by the Parties in Nagoya was the first-ever long-term Decision by a Rio Convention to recognise and support the role of local and subnational governments as key implementing partners to the Parties.

Decision XI/8, followed in 2012 at CBD COP 11 in Hyderabad, requesting the Executive Secretary to support the activities of the Global Partnership (a CBD-facilitated global instrument used to collate and support the local and subnational constituencies in partnership with key partners such as ICLEI) and inviting Parties to develop and support tools and initiatives that facilitate the local and subnational implementation of the Convention.

The Nagoya Plan of Action endorsed with the adoption of **Decision X/22**, provides suggestions to Parties on how to **mobilize and coordinate local actions** on biodiversity, and **align** these with locally contextualised national strategies and plans.

A set of **objectives, monitoring and reporting guidelines**, as well as **suggested activities** for implementation are presented in the **Plan**, as well as an **institutional framework** for optimizing synergies between Parties, UN and development agencies, NGOs and networks of local and subnational governments.

The **Nagoya Plan of Action** calls for dissemination of best practices to better promote local efforts and to facilitate communications between **all levels of government**, and for those governments to work together in developing their respective biodiversity strategies and action plans.

Since these earlier Decisions, more locally focused COP Decisions followed at every meeting of the Parties, including the inclusion of the local and subnational constituency in the key “Mainstreaming Decision” adopted in Cancun during COP13.

In parallel to this welcome recognition by the Parties, ICLEI has been leading an increasingly effective and expanding communications, awareness and advocacy drive both within our own

constituency, with partners and among the CBD Parties and other stakeholders, closely coordinated with the SCBD and key Parties.

This advocacy work has recently intensified ahead of COP15 as contribution towards a strong and inclusive post-2020 Global Biodiversity Framework. To this end, ICLEI with our key partners, are currently consulting our broader constituency through our respective governance and consultative structures on the development of a formal position paper on our constituency's collective ambitions and messages as contribution to the collective post-2020 Global Biodiversity Framework negotiation process.

*Our intention is to formally present our first formal position paper/statement on **Local and Subnational Government ambitions and messages to the Post-2020 Global Biodiversity Framework negotiation process at SBSTTA 23 on behalf of our constituency.***

2. ICLEI's Initial Comments on CBD Discussion Paper: (CBD/POST2020/PREP/1/1)

In providing comments on the current **Post-2020 Global Biodiversity Framework: Discussion Paper**, we wish to raise the following key points and messages in relation to local and subnational governments.

- 2.1 It is important to recognise the **ground-breaking nature and intrinsic value of the Nagoya Plan of Action as adopted by the Parties in Decision X/22**. Not only did this Decision mark a first of its kind Decisions by a Rio Convention in terms of long-term recognition of, and intention to work with and support the actions of, local and subnational governments, it also articulated a growing global recognition that the global development agenda essentially needs to be implemented at the local and subnational level. It is here, on the ground where mainstreaming and integration is most essential, and where such mainstreaming is a daily prerequisite for good governance and sustainable development.
- 2.2 Those, the majority of humankind, living in and around our cities and towns, need an inclusive, safe, resilient and sustainable environment in which to live (as articulated and elaborated on in SDG 11) and for this, they rely first and foremost on their locally elected leaders. Cities are also proven incubators for rapid and systemic change, with enormous multiplying and leapfrogging potential among and between themselves, especially if supported by enabling international and national policies and plans. **The Nagoya Plan of Action** was adopted by the Parties almost nine years ago to give effect to the significant and essential potential contributions which subnational actors can make and ICLEI recommends that the Parties consider to further build upon and strengthen this Plan and the spirit in which it was formulated and adopted. In the development of the **Post-2020 Global Biodiversity Framework**.
- 2.3 ICLEI continues to advocate for the recognition of the mandates and competencies of local and subnational governments through the **incorporation of the principles of multilevel governance and cooperation and the need for vertical integration**. Local and subnational governments are levels of government in their own right, and their role in the post-2020 global biodiversity framework should not be relegated to the section on "Integrating diverse perspectives". Rather, we call for the principles of multilevel governance and cooperation and

vertical integration (inclusive of all levels of government) to be clearly instead articulated and mainstreamed throughout the post-2020 global biodiversity framework.

- 2.3 Local and subnational governments are potential key actors in implementing the **ecosystems approach**, advocated in CBD COP Decisions [V/6](#) and [VII/11](#) on the ground; as well as in **strengthening urban-rural linkages**, as advocated in the UN Habitat initiative on Guiding Principles for Urban-Rural Linkages to Advance Integrated Territorial Development. Thus we call for explicit recognition and strengthening of local and subnational government's role in implementing the ecosystems approach and strengthening urban-rural linkages, in particular in land-use and spatial planning and decision-making processes.
- 2.4 As a general principle it is important to ensure that **past CBD COP Decisions**, as well as the calls made to CBD Parties in past Global Biodiversity Summit statements, such as the **Quintana Roo (2016) and Sharm El-Sheikh (2018) Communiqués**, are **extended in the post-2020 Global Biodiversity Framework**. This relates to a wide range of issues including resource mobilisation, locally accessible financial mechanisms, and building capacity at local and subnational levels. With this in mind, ICLEI is undertaking an assessment of how past CBD COP Decisions have aided, accelerated and supported biodiversity work at the local and subnational levels. The **CitiesWithNature** (www.citieswnature.org) platform, will serve to gather information on the extent to which these decisions have borne fruit on the ground, the results achieved, key benefits, areas for improvement and outcomes in support of the Nagoya Plan of Action (immediate) and the 2050 Vision (intermediate).
- 2.5 Based on its extensive experience of working closely with local and subnational governments over the past three decades, ICLEI has first-hand knowledge and actual experience of HOW local and subnational governments can really be effective with shared roles, responsibilities and functions in an integrated and vertically aligned NBSAP approach; and can provide clear and practical recommendations on the structural and operational aspects of an integrated vertical cooperation and recommend that mechanism are supported for the acceleration of sharing good practice at local to national level, including through the rollout of the [Guidelines for an Integrated Approach in the Development and Implementation of national, Subnational and Local Biodiversity Strategies and Action Plans](#).

In addition, we advance the following comments with regard to some of the specific issues raised in the **Discussion Paper**:

a) *Ambition of the post-2020 Global Biodiversity Framework*

To achieve the transformational change desired, it is important to adopt a multilevel governance approach and establish an effective multilevel governance and cooperation structure for collective and integrated action across all levels of government towards meeting global biodiversity targets through significantly up-scaled implementation.

b) *2050 Vision for Biodiversity - "Living in Harmony with Nature by 2050"*

We live in the 'urban century' and the rate of rapid urbanisation and biodiversity loss is unprecedented. Now, more than ever, there is a need for all levels of government to unite and embrace nature, and to reconnect communities with nature. The recently launched global initiative, [CitiesWithNature](#), recognizes and enhances the value of nature in and around cities and city-regions across the world. It provides a shared platform for local and subnational governments and their partners to engage and connect, working with shared

commitment towards a more sustainable urban world, and for embedding the 2050 Vision for Biodiversity at local and subnational levels of government and within urban communities. As global platform [CitiesWithNature](#), provides an innovative, interactive and user-friendly vehicle for articulating the Vision in practical and tangible ways for those managing and living in cities, towns and city-regions around the world.

c) Biodiversity targets

We support the position of involving local and subnational governments directly in national target setting to ensure buy-in and achievement on the ground in contributing to global biodiversity targets. Each level of government has a distinct role to play in contributing to the achievement of global biodiversity targets, and in ensuring its actions, programme of work and priorities are aligned in support of achieving these global targets. Many of these can be advanced significantly through emerging as well as tried and tested interventions at local and subnational level such as nature-based solutions (NBS), biophilic solutions, landscape-based planning approaches, linkages between climate action and nature-based solutions, nexus-based health, wellbeing and nature approaches for and by urban and peri-urban communities and local services, and socially supported infrastructure-related “tinkering” approaches.

d) Relationship between the post-2020 Global Biodiversity Framework and other relevant processes

We strongly support the notion of forging stronger and more explicit alignment and synergies between all relevant UN Environmental Agreements, and in particular between the CBD, SDGs, all three Rio and related Conventions and the global development agenda, manifested in milestones such as the Paris Climate Change Agreement and the Sendai Framework for Disaster Risk Reduction, in negotiating the post-2020 Global Biodiversity Framework and revisited / renewed Aichi Biodiversity Targets. The increasing global recognition given to nature-based solutions in the climate debates, is evident in the **inclusion of a nature-based solutions work stream in the 2019 UN Climate Action Summit**. ICLEI is well positioned to facilitate the linkages and alignment between the global climate and biodiversity agendas at local and subnational level.

e) Mainstreaming

ICLEI, through the implementation of the (German’s BMU) IKI-funded INTERACT Bio-integrated action on biodiversity project (<https://cbc.iclei.org/project/interact-bio/>), and other projects such as our suite of Urban Natural Assets (UNA) projects funded by SwedBio (SIDA supported) has developed a simple yet practical and effective model for mainstreaming biodiversity at the local and subnational levels of government through land-use & sector planning and decision-making processes, the development of Local Biodiversity Strategies & Action Plans (LBSAPs) that are aligned with, and complementary to NBSAPs, implementation projects, reporting and developing investment cases for financing for NBS implementation at the local level. These projects are ready for scaling out and for nationally supported uptake by many more subnational and local governments worldwide, with immediate positive results towards the attainment of the most pressing Aichi targets.

f) Implementation & NBSAPs

We strongly support the need for local and subnational governments to develop biodiversity Strategies and Action Plans that feed into NBSAPs and for greater vertical integration to ensure uptake and implementation of national targets at local and subnational levels. The

[Guidelines for an Integrated Approach in the Development and Implementation of national, Subnational and Local Biodiversity Strategies and Action Plans](#) provide clear guidance on achieving effective vertical integration and strengthening the role of local and subnational governments in NBSAP development and implementation.

g) *Review process*

It should be considered that the post-2020 Global Biodiversity Framework should recognize and strengthen the important role that local and subnational governments play in gathering information; actively monitoring and evaluating actions and systems at local and subnational levels for biodiversity mainstreaming, implementing the ecosystems approach and strengthening urban-rural linkages at reference; and reporting on progress.

h) *Integrating diverse perspectives*

Local and subnational governments should not be addressed sectorally in this paragraph of the post-2020 Global Biodiversity Framework but should be mainstreamed and regarded as integral to the effective implementation of the entire Framework agreement.

Yours sincerely,



Kobie Brand
Director: ICLEI Cities Biodiversity Center
ICLEI – Local Governments for Sustainability