**Global Commons Alliance input on CBD Notification 2019-108**

In recommendation 23/1, the Subsidiary Body on Scientific, Technical and Technological Advice

(SBSTTA) requested the Executive Secretary to invite written submissions from Parties and others on views on possible targets, indicators and baselines related to the drivers of biodiversity loss as well as on species conservation and the mainstreaming of biodiversity across sectors in relation to the development of the post-2020 global biodiversity framework.

This input is **offered in response to the goal laid out in Item 10a rom the Zero Draft of the post-2020 global biodiversity framework**:  "No net loss by 2030 in the area and integrity of freshwater, marine and terrestrial ecosystems, and increases of at least [20%] by 2050, ensuring ecosystem resilience".

**Feedback on the CBD net zero loss goal and reflections on an explicit baseline concept.** In general the Alliance welcomes the ambition and clarity of this goal by the CBD and believe that the goal would be much improved by addressing the points below:

1. **The goal is normative, but not science-based.** The goal is politically ambitious but is not science-based.  Without providing explicit guidance on the percentage or number associated with no net loss of area or integrity the outcome is unclear, and by referring to only no net loss means that multiple outcomes are possible. In this context avoidance guidance will be critical to incorporate within the goal.
2. **The goal requires guardrails.**To achieve no net loss we need to keep ecosystems within a safe operating space (based on extent, integrity and significance). Likewise no net loss can only be possible if kept within a safe operating space. Guardrails are important for the ambition of this goals, and while safe operating space is a challenging concept to communicate and could be perceived as less ambitious, it is a high-level target, may be more feasible in practice, and could help overcome the challenge that no net loss cannot be shared with all ecosystems equally.
3. **A baseline is lacking from both aspects of the draft CBD goal.** The goal does not currently have an explicit baseline, and could be read as a very low ambitious target to reach net zero only in 2030 (potentially inviting countries to exploit full blast during the coming decade). The inclusion of a baseline would mean that all nature lost after a given year will have to be restored (a very clear, very operational direction). However, the choice of a baseline year is critical. For example, a 2020 baseline will not be sufficiently ambitious and may lead to a high risk of loss for a large number of ecoystems. In particular, not losing further area or integrity of Atlantic rainforests that have already been significantly degraded is not enough, we need to act now to save these critical ecosystems. It has been suggested by the group that 2015 may be more appropriate as it aligns with existing baselines in other conventions e.g. UNCCD’s Land Degradation Neutrality target, and it will be more realistic to source data from 2015 (e.g. validated land cover data).
4. **The phrasing of “by 2030” causes confusion.** “No net loss by 2030” implies that we can keep on losing the area and integrity of ecosystems until 2030 and leads to confusion on whether it is a rate of loss at 2030 we are looking to work with or not. Net zero loss after 2030 with a return to 2015 levels is one suggestion to aid clarity.
5. **Protect and restore must be parallel processes.** The goal currently reads as though the actor should protect or conserve and then restore sequentially. Restoration must happen from the start and act in parallel with protection and conservation efforts, otherwise we will lose critical ecosystems that are already at risk.
6. **The goal does not include reference to socio-economic transformation.** By using no net loss as the goal it avoids prescriptive language with respect to socio-economic transformation.
7. **Direct translation to specific sectors will be difficult.** The no net loss goal may work for some sectors which understand their locations and are largely place-based, for example mining or energy. It will be more difficult for sectors like agriculture and companies with large supply chains as investing in restoration of other areas will be challenging to implement in practice. No net loss implementation for some companies may be difficult as they might need to restore an area much larger than what is possible.
8. **It is essential to incorporate integrity in any communication on the goal.** Our interpretation of the goal at the prototyping workshop suggests that integrity is absolutely essential, and is key to defining some level of guardrail (as above). We feel strongly that integrity be included in the final wording for the goal and in any communications, with a definition for it included in the framework. The goal also creates wider communication challenges as it could lead to multiple interpretations by different actors.
9. **Function is not covered well.**Zero net loss (or variant of) should be applauded as a clear conservation target, it does not cover function well (NCP’s). The NCP community should be challenged to articulate an equally clear apex target for function.