

# Greenpeace submission to CBD post-2020 global biodiversity framework

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In response to the invitation by the Secretariat of the Convention on Biological Diversity (CBD) for States and observers to provide further views on the post-2020 global biodiversity framework, Greenpeace wishes to share the following recommendations, which focus specifically on the critical matter of improved implementation.

1. A robust implementation mechanism is critical to the success of the post-2020 global biodiversity framework and should form an integral part of it. Carefully designed and ambitious targets are needed in response to the global biodiversity crisis, but without a strong implementation mechanism, the global targets could become castles in the air.
2. The lack of an effective implementation mechanism is an important reason behind the failure to fully deliver the Aichi Targets. The process in the run up to COP15 needs to learn from that experience and do differently. A well-established implementation mechanism will not only enhance target delivery but also strengthen the credibility of the post-2020 global biodiversity framework.
3. The implementation mechanism refers to the relevant processes and instruments that could be adopted by the CBD to facilitate enhanced domestic implementation towards the post-2020 global biodiversity targets. Transparency, review, ratchet up, voluntary commitment, and compliance are some of the ideas mentioned in previous meetings and submissions, which could be broadly categorized as part of the implementation mechanism.
4. Additionally, it is critical that Parties to the CBD include clear obligations on the promotion of the implementation of post-2020 global biodiversity targets through the work of other relevant global and regional bodies and processes they are members to.
5. It is important to ensure the process in the run up to COP15 has sufficient time to discuss the implementation mechanism. We recommend one thematic consultation to be dedicated to this issue. In our view, the agenda of the Open-ended Working Group (OEWG) also needs to be carefully considered to provide enough space for this issue.
6. The point of departure for a better implementation mechanism is the creation of more uniformity in national plans and actions. Different from global climate change governance – in which, a large part of the mission could be boiled down to a few clear actions including, inter alia, the reduction of greenhouse gas emissions, the adaptation to the adverse impact, and the provision of climate finance – the CBD has for long suffered from a lack of uniformity in national actions. As a result, the concept of “biodiversity protection” and the concrete action it entails have been vague, hindering biodiversity from receiving the political attention it deserves.
7. While respecting the difference between climate change and biodiversity, and realizing the complexity of biodiversity may not allow the prescription of a simple set of actions applicable to all countries, the uniformity of national plans and actions should be enhanced. This will help assess domestic action, compare progress, facilitate experience sharing, build trust, aggregate domestic efforts against the global targets, and ensure more targeted international support.

8. We believe this enhancement of uniformity could be achieved by adopting new guidelines for the National Biodiversity Strategies and Action Plan (NBSAP), as the primary vehicle for national implementation towards the post-2020 targets. While respecting different national circumstances, the guidelines should require Parties to implement a uniform set of actions in, and adopt a common format for, their NBSAPs.
9. In developing such guidelines, Parties could draw on the experience of the Paris Agreement in developing its guidelines for Nationally Determined Contributions (NDCs). Annex I of Decision 4/CMA.1<sup>1</sup>, adopted in 2018 at UNFCCC COP24, provides a list of information to facilitate clarity, transparency and understanding of NDCs. The Decision stipulates that Parties “shall provide” this information “as applicable to their nationally determined contributions”. Such a list of information could be adopted in formulating the guidelines for NBSAPs.
10. The guidelines should also ask Parties to provide, soon after the adoption of the global targets, plans and actions intended to contribute to the delivery of the post-2020 targets (for example, if the post-2020 global framework has a land related target, a Party needs to develop a corresponding national land related target). This is the bare minimum required to ensure national implementation adds up to the ambition captured by the global framework.
11. Parties should also consider making NBSAP more up to date and enhance the level of ambition embedded in it over time. One idea is for the guidelines to ask Parties to provide an “executive summary” of their NBSAP. That summary could be subjected to common formative and substantive requirements and be periodically updated and enhanced.
12. The guidelines need to be developed in parallel with the development of post-2020 targets and be adopted at COP15, so that it could guide Parties in time in their development of the NBSAPs in accordance with the new framework. International support, including finance and capacity building, could be contingent on the quality of the NBSAP and its adherence to implementation.
13. We realize that there are different views with regard to various aspects of voluntary commitment (VC). Greenpeace strongly believes that the purpose of UN negotiations is for States to make firm commitments; commitments that Parties need to follow up domestically and hold each other to. We therefore believe urgent clarification is needed so that *at most* the purpose of VC is limited to bridging the near term implementation gap pre-2020, if the commitment comes from Parties; or it is aimed at complementing the effort of Parties, if the commitment comes from non-Party stakeholders. The timing of VC submission from Parties should therefore be in the run up to COP15. The ambition captured in the VC from Parties must go beyond existing policy and action. NBSAP should continue to serve as the instrument for national implementation post-2020. A Party that is interested in enhancing its ambition can always do so by updating its NBSAP. The co-existence of multiple instruments post-2020 is not necessary and risks defusing political attention and weakening accountability.
14. With due regard and without prejudice to the importance of other implementation mechanisms, such as transparency, review, and ratchet up, we recommend the construction of other implementation mechanisms to be conducted on the premise of stronger uniformity been created in NBSAPs through the application of the guidelines. In our view, sequencing and prioritization is needed. The guidelines and more uniformed national actions, as the first step of strengthening the architecture of the CBD, will make the “what” to be reported, reviewed, and ratcheted up clearer and more meaningful.
15. With regard to the post-2020 biodiversity targets, Greenpeace supports the setting of ambitious and measurable targets based on the best scientific advice and relevant traditional knowledge. Scientists warn of “Earth’s ongoing sixth major extinction event”<sup>2</sup>, propelled by human destruction of wildlife. The post-2020 biodiversity targets must reflect and respond to the severity of this threat to life on our planet.

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<sup>1</sup> [https://unfccc.int/sites/default/files/resource/cma2018\\_3\\_add1\\_advance.pdf#page=6](https://unfccc.int/sites/default/files/resource/cma2018_3_add1_advance.pdf#page=6)

<sup>2</sup> <https://www.pnas.org/content/114/30/E6089>

16. With regard to the specific target on ocean protection, we refer to the joint submission<sup>3</sup> of Greenpeace, Pew, Ocean Unite, and NRDC recommending at least 30% fully or highly protected areas to be established by 2030. Greenpeace has recently published a report “30x30: A Blueprint For Ocean Protection”<sup>4</sup>, based on collaboration with leading academics at the University of York and University of Oxford. The report focuses on international waters and maps out how to protect at least 30% of the world’s oceans by 2030, a target that scientists say is crucial to safeguard wildlife and to help mitigate the impacts of climate change.

Greenpeace looks forward to engaging with Parties and other stakeholders in the run up to COP15.

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<sup>3</sup> <https://www.cbd.int/doc/strategic-plan/Post2020/postsbi/pew.pdf>

<sup>4</sup> <https://www.greenpeace.org/international/publication/21604/30x30-a-blueprint-for-ocean-protection/>