Avaaz's response to the draft monitoring framework for the post-2020 global biodiversity framework

AVAAZ

A message from Avaaz

Dear friends, colleagues, distinguished delegates, and members of the CBD Secretariat:

Avaaz is grateful for the invitation to provide input in response to the CBD Secretariat's 25 June 2020 Notification 2020-024 regarding peer review of draft documents related to Agenda item 3 on the post-2020 global biodiversity framework and for the twenty-fourth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA 24).

This submission on the "Draft monitoring framework for the post-2020 global biodiversity framework (GBF) for review" reflects perspectives and suggestions in line with science-backed proposals supported by millions of Avaaz members from all of the countries that are State signatories of this convention. It also reflects the perspectives of indigenous peoples, local communities, and grassroots organizations from 100 different countries. **Our general and specific comments can be seen from page 6 of this document**.

Humanity is facing profound and unprecedented challenges and transformations - all of which are essentially global. **On top of environmental challenges, we're also facing a pandemic which is calling us to rethink, reinterpret and realign our relationship with nature**. Just a few days ago, a comprehensive analysis found that human destruction of natural ecosystems increases the likelihood of future pandemics like Covid-19.

Just a few months ago, last May, a quantitative analysis published in Nature warned about far more serious consequences resulting from deforestation: based on the current resource consumption rates and best estimate of technological growth, the study shows that we have very low probability, less than 10% in the most optimistic estimate, to survive without facing a catastrophic collapse. The study states that we could reach the point of 'no-return' within 20-40 years.

These two studies, along with many others, are stark reminders of both the scale of the challenge the world is facing, and the uttermost importance of the Global Biodiversity Framework (GBF).

Avaaz is a people-powered movement with more than 63 million members around the world, campaigning on the most crucial issues of our time: protecting human rights, combating disinformation, tackling hate speech, fundraising for local development, supporting humanitarian enterprises, and working to protect the environment. Since our founding, 13 years ago, our members have been deeply involved in thousands of global, regional, and national efforts to preserve our planet, hand in hand with indigenous peoples, local communities, and grassroots organizations around the world.

Managing at least half of the planet sustainably, and putting the other half under protection by 2030, with the leadership and support of indigenous peoples and local communities, is the science-based north star Avaaz,2.3 million of our members[1] and dozens of indigenous peoples and local communities across the world are urging world leaders to navigate by. Reaching this target is how we restore harmony with our home. The GBF must play a key role in that path to recovery and people can certainly

[1] World Leaders: Protect Half Our Planet https://secure.avaaz.org/campaign/en/protect_half_our_planet_loc_2019/, 2,335,024 signatures

make a difference. **Our submission focuses on providing monitoring elements and indicators based on the five key priorities we concluded the GBF should focus on:**

(1) **Agree on a science-based set of goals and targets:** we can't compromise on science if we don't want to compromise the planet. A stronger set of targets to measure progress towards conservation, restoration and sustainable use of all biodiversity components is needed, not just a description of the state of nature.

(2) **Place indigenous peoples and local communities (IPLCs) front and centre:** This is not only our moral duty but a strategic imperative for our global security. Assessing their role in biodiversity conservation and sustainable use must go far beyond what has been done for many years in order to ensure their full and effective participation, as well as to appreciate their often invisible contribution and track progress with more precision.

(3) **End harmful incentives that encourage the destruction of biodiversity:** We urgently need to analyse progress in the redirection and phasing out of harmful incentives and investments to biodiversity, learning from the failures of Aichi Target 3, in particular.

(4) **Ensure compliance and accountability:** Accountability and compliance indicators are missing from this draft. From our perspective, it is essential to have consequences when parties don't fulfil their commitments and the draft should address this more explicitly, as tracking failure enriches amendments and replanning.

(5) **Open up for people's participation:** Mainstreaming biodiversity necessarily includes public participation, transparency and -again- the full and effective participation of all sectors of the population, especially Indigenous Peoples and Local Communities (IPLCs), women and girls, youth and civil society.

Last but not least, before reading our input, let us address you not as experts, but as human beings who have dedicated much of your lives to protecting our common home. And let us thank you again, sincerely, for all the work you have done so far amidst enormous challenges. Because while the pandemic is limiting our ability to meet in person and discuss the solutions needed for the world, it's been inspiring to see many of you (at least via Zoom) stepping up and rising to the challenge we face today. We count on you.

In hope, and determination to protect our common home,

The Avaaz community

PS: Additionally, we're also providing input to the information document on the Linkages between the post-2020 global biodiversity framework and 2030 agenda for sustainable development (**available here**) and presenting more data for the Information Document on Indicators for the post-2020 global biodiversity framework, prepared for SBSTTA24 by UNEP-WCMC in collaboration with the Biodiversity Indicators Partnership (**available here**).

Disclaimer on the review comment

Before presenting our inputs, we wish to share a concern on the process and methodology of this peer-review document. Given the instruction that goals and targets are not up for discussion, the review of components, monitoring elements, indicators and baselines presents methodological challenges on scope we can't ignore. Hence, for the purpose of our response, we're offering comments and suggestions on goals and targets as well, in order to provide technically sound, consistent and meaningful comments on components, elements, indicators and baselines.

Furthermore, with monitoring elements and indicators under discussion in the current framework, without addressing goals and targets, Avaaz sees a potential risk of a policy bias or a *de facto* discussion within certain policy boundaries that could lead the process to focus on priorities that don't necessarily represent the whole diversity of views of the actors involved. Avaaz warns that the current sequence would exacerbate the disparity of representation of perspectives, especially in detriment to actors in the least developed countries, and in particular from rights holders in the Global South, in particular women and girls, youth and indigenous peoples and local communities (IPLCs).

Our technical disclaimer and methodological reservation is based on the following observations:

1. Avaaz acknowledges that review comments are not being sought on the updated formulations of the proposed 2050 goals and the 2030 targets and its 2030 milestones, and understand that such formulations were provided only for context, as further consideration of these will take place at the third meeting of the open-ended working group (OEWG-3). Following the same logic, as context, Avaaz is providing comments and suggestions on goals and targets as well, since some of our feedback, inputs and recommendations on components, elements, indicators and baselines can only be understood within that context.

2. Avaaz also notes the recommendation adopted by the OEWG-2 to invite the SBSTTA at its twenty-fourth meeting "to carry out a scientific and technical review of the updated goals and targets, and related indicators and baselines, of the draft global biodiversity framework, as well as the revised appendices to the framework, and to provide advice to the Working Group at its third meeting" (CBD/WG2020/REC/2/1, paragraph 3, the underline is ours) and given that reason we err on the side of caution and, *ad arbitrium,* we comment on goals and targets as well.

3. Avaaz further notes that alternative wordings suggested at OEWG-2 (CBD/WG2020/REC/2/1, pages 2-49) are not fully reflected in the monitoring framework, therefore we suggest goals, targets, components, elements and indicators based on the spirit of what has been discussed at OEWG-2, especially the language that is not included in the monitoring framework. Far from indicating any sign of disrespect to the scope of the assignment, we believe we have the obligation to comment on them, ensuring technical integrity and accuracy.

4. Furthermore, while we acknowledge that the goals and targets are not subject for review as part of this specific set of submissions ahead of the SBSTTA24, Avaaz wants to put on record that our comments on this monitoring framework by no means indicate in any way an explicit or *de facto* recognition of the new articulation of goals and targets outlined in the document, some of which appear

not to be backed by robust scientific evidence and/or could undermine the rights of relevant groups of this Convention, where some omissions could clash with the principle of Non-Regression.

5. Last but not least, since these documents exclude goals and targets themselves from the peer review, Avaaz notes procedural inconsistencies in the logic of the sequence of the process that could compromise the quality of the overall technical output of this peer-review process. And in line with what has been expressed by the CBD Alliance, Avaaz believes that indicators should be discussed after the goals and targets are agreed or pre-agreed, with an additional process to update the indicator framework once goals and targets are finally agreed by the CoP.

On the points above, while we don't agree with the methodological constraints outlined for this contribution, Avaaz wants to make clear that our disclaimer does not indicate any distrust in the process. Instead, Avaaz wants to be explicit in the nature of our comments, both for the purpose of providing a constructive critique to this monitoring framework, and also as a warning against the potential risk of guiding negotiations without a diverse and proper representation of views, geographies and relevant groups of this Convention.

We trust that it wasn't the intention of this monitoring framework to put limits on the terms of the discussion to the detriment of the least represented groups. Rather, what we see in the current draft is a reflection of an over-representation in the process that should be addressed in order to encourage the diversity of perspectives that will ultimately deliver the three objectives of the Convention.

While we appreciate the intention to provide an absolute minimum threshold as a negotiation base, we caution that such a frame could be understood differently, risking negotiations to be forced below the ambition level reflected in the Recommendation Adopted by the Open-ended Working Group On The Post2020 Global Biodiversity Framework (CBD/WG2020/REC/2/1, pages 2-49).

Avaaz comments

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework

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General comments

01. We note in the monitoring framework a bias toward a "monoculture" mindset that heavily relies in Western knowledge on natural sciences. Avaaz calls for a more diverse set of components, monitoring elements and indicators that can provide a holistic, balanced and full picture of the state of the world and in particular the actions that should be taken to revert the loss of biodiversity. Across the monitoring framework it became clear that components, monitoring elements, indicators and baselines, from ontological and epistemological perspectives, are heavily focused on natural sciences and quantitative measures. The framework should therefore find the right balance between western-based exact sciences and multiple types of knowledge and evidence, including social sciences and indigenous and local knowledge systems. The Sharm El-Sheikh Declaration on Nature and Culture (CBD/COP/14/INF/46), in its operational paragraph 10, call on Parties to "promote and further develop culturally-relevant and community-based monitoring and reporting indicators which can provide strong evidence, lead to better tracking, and enable meaningful action on the ground to address local issues and key threats" and in its operational paragraph 7, it states: "Promote a sustained dialogue between science and indigenous and local knowledge systems to provide a foundation for a new paradigm, generating the best possible knowledge and solutions for biological and cultural resilience". This monitoring framework falls short in this regard.

02. We note a disparity in goals and targets (and in their respective components, elements, indicators and baselines), with particular emphasis on conservation in detriment with the objectives on sustainable use and benefit sharing: Avaaz calls on SBSTTA to ensure a robust balance in the monitoring framework that reflects appropriately the three objectives of the convention. Currently, Goal A (on conservation) has more than almost 50 elements and indicators, while Goal B (with more emphasis on sustainable use) has over 20 elements and indicators, while Goal C (on benefit sharing) only has 5 elements and indicators. Avaaz believes that the monitoring framework should reflect with more precision a technical and scientific balance that allows a holistic and complete overview in the progress of all the objectives of the CBD convention and not only conservation (*Article 1. Objectives: The objectives of this Convention, to be pursued in accordance with its relevant provisions, are the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources, including by appropriate access to genetic resources and by appropriate transfer of relevant technologies, taking into account all rights over those resources and to technologies, and by appropriate funding.*).

03. We note that the proposed monitoring framework largely ignores the key role of indigenous peoples and local communities (IPLCs) in safeguarding biodiversity: given their central role in delivering positive biodiversity outcomes, Avaaz calls on SBSTTA to consider the inclusion of IPLCs across all goals and targets. Science is now clear that IPLCs are the most effective and efficient custodians of our biodiversity, and that's why we note with concern that the relationship of IPLCs with ecosystem conservation, integrity and connectivity is not considered in this framework. In situ conservation practices, especially regarding agricultural practices including traditional agricultural practices, should be considered when biodiversity conservation and sustainable use and utilization is mentioned throughout this document. Furthermore, Avaaz believes that more work needs to be done in the monitoring draft for the target 20: mentioning only "relevant" resources in Target 20, with regards to IPCLs, seriously limits their role as guardians and first respondents in ecosystem conservation, integrity and connectivity, as well as in situ biodiversity conservation, including natural and genetic resources important for food and agriculture. Within the boundaries of the current draft, Avaaz suggests that special emphasis should be put on "other area-based conservation measures" to ensure that ICCAs / IPLCs lands are included. We also suggest the addition of a fifth goal focused on traditional knowledge, which would improve the output of the whole GBF.

04. We note, more broadly, that the monitoring framework is not properly reflecting the role of people in preserving biodiversity. People in both cities and rural areas will play a key role, because what we need is to stop the sixth extinction. We need to learn to live without overconsumption, which increases global biodiversity loss, and to not transfer biodiversity loss from certain areas to others in the name of conservation or "sustainable practices". Crucially, the cross-cutting view of sustainability is not considered, in general, and environmental topics are isolated from cultural, economic and social considerations. Looking at it in its entirety, we note in this framework an absence of monitoring elements and indicators (or potential future monitoring elements and indicators) related to in situ conservation, which plays a critical role in fulfilling the goals and targets that this process will define in due course. Furthermore, we note a deficit in addressing the mainstreaming of biodiversity into sectors as decided by the CBD COP in its two past meetings at Cancun, Mexico and Sharm El-Sheikh, Egypt. In today's complex landscape the needs and demands of communities and people go far beyond their frontiers, which means the world needs a strong biodiversity framework, one that truly connects the policy elites and those in the peripheries. We need to rise, we need a results-driven GBF which meets the world's expectations, in an era where many are feeling trapped in the middle of a collective stagnation and failure.

05. While we appreciate the effort to integrate the GBF within the Agenda 2030, we believe that some indicators under SDG15 should be reviewed for the purpose of this framework and in light of new international context: we believe that some SDG 15 targets should be reviewed for the purpose of this framework, and indicators for topics related to SDG 15 should be used in relation to IPLCs, traditional knowledge associated with agriculture and forestry, sustainable forest management, traditional agriculture (e.g. GIAHS), among others. In fact, traditional knowledge is only mentioned once (line 239), and is not considered in conservation targets, not even associated with genetic resource conservation, therefore indicators for SDG 15.6 should be used in this monitoring framework. We offer some feedback and inputs in this document and greater detail in our response to the document Linkages between the Post-2020 Global Biodiversity Framework and 2030 Agenda for Sustainable Development (**click here to read our position**).

***NOTE**: ~~In red and strikethrough are our suggestions for deletions~~, of, and **in bold green our suggestions for amendments and/or additions**. Also, in the spirit of providing clarity and a holistic view of our suggestions on the draft monitoring framework, our comments on goals and targets are presented with blue grey background, in order to facilitate reading and make them distinct from the original remit and scope of this peer-review comments, which comprises our comments on components, elements, indicators and baselines.*

Specific comments table 1 (goals)

TABLE	PAGE	COLUMN LETTER	ROW NUMBER	COMMENT
1	2	N/A	1-28 GOAL A	**A general comment on Goal A:** Avaaz is concerned that this goal is less ambitious than its predecessor in the zero draft of the global biodiversity framework (GBF); originally the target was a 20% increase of connectivity and integrity of natural ecosystems (in response of the Zero Draft, Avaaz suggested an increase of at least 30%). On the other hand, the way this goal is articulated doesn't offer a clear baseline for these milestones. Last but not least, the word "reduction" implies a *de facto* acceptance of further decline or potential extinction of some species, therefore we suggest to replace that term and include the word "elimination" with regard to the actual threat of the species. **For the purpose of reference, we suggest the following language:** "**No further loss by 2030 in** the area, connectivity and integrity of **all** natural ecosystems, **with high importance for biodiversity or high ecological integrity. With 2020 as a baseline,** biodiversity will be increased by at least [**30%**] in said areas, supporting healthy and resilient populations of all species while ~~reducing~~ **eliminating the threats of human induced activities to the** ~~number of~~ species ~~that are threatened~~ by **[100%]** and maintaining genetic diversity". **Additional comment:** We suggest parties consider the possibility of including a 2030 milestone on securing the recognition and protection of territories owned, managed and used by indigenous peoples and local communities, given the scientifically proven contribution that these territories can make to the achievement of Goal A.

1	2	A	1-14	**Methodological suggestion and observation**: The reference point is too broad to evaluate indicators and what's missing is a set of indicators that can describe the areas of different habitats in good ecological status.
1	2	A	15-28	**Methodological suggestion and observation**: Component A2 should refer to ecosystem integrity and connectivity in alignment with the other components for this goal.
1	2	B	1	**Methodological suggestion and observation**: Avaaz suggests to articulate distinct trend subsets to identify with more precision the trends in areas of rainforests, sub-humid, tropical dry forests and others (e.g. Holdridge Life-Zones). **Why:** As commented above.
1	2	C	1	**We suggest:** Forest ~~area~~ **ecosystems and other native vegetations** as a proportion of total land area (in line with SDG indicator 15.1.1). **Why:** It's important to make a clear distinction between natural forests and monoculture plantations, therefore such indicators should focus only on forest ecosystems (primary forests and planted, restored or regenerated forests with native species), excluding introduced species, as outlined in FAO's Global Forest Assessment 2015 (see FRA 2015). Furthermore, it's also key to include other types of vegetations that are key for biodiversity (such as savannah, maquis, savannahs, deserts, meadows, tundras, alpine plants, swamps, peatlands, wetlands, floodplains, chaparral, steppe, fynbos, macchia, heathlands and other type natural pastures/vegetations).
1	2	C	**Additional indicator suggested after row 1**	**We suggest adding: Trends in** Global Annual Gross Tree Cover Loss (Hectares) **Why:** See Hansen/GFW
1	2	B	**Additional monitoring element suggested after row 2**	**We suggest adding**: Trends in mountain biodiversity. **Why:** The CBD Programme of Work on Mountain Biodiversity, in its Goal 3 has the mandate to improve knowledge and methods of the assessment and monitoring of the status and trends of mountain biological diversity based on available information.
1	2	C	**Additional indicator suggested after row 2**	**We suggest adding**: Mountain Green Cover Index under "Trends in Area of Forests Ecosystems". **Why**: As commented before.

1	2	C	**Additional indicator suggested after row 2**	**We suggest adding**: Human Footprint (HFP) Index (see Venter et al. 2016) under "Trends in area of forests ecosystems". **Why**: The index will provide data on the impact of human activities over natural ecosystems on an annual basis from 2020, which will be critical to measure trends in the area of forest ecosystems; this index is included in the Indicators for the post-2020 Global Biodiversity Framework, the information document prepared for SBSTTA-24 by UNEP-WCMC in collaboration with the Biodiversity Indicators Partnership (hereinafter BIP document).
1	2	C	**Additional indicator suggested after row 4**	**We suggest adding:** Human Footprint (HFP) Index (see Venter et al. 2016) under "Trends in Area of Other Terrestrial Ecosystems". **Why**: The index will provide data on the impact of human activities over natural ecosystems from 2020 and on an annual basis; this index is included in the BIP document.
1	2	B	15-25	**Methodological suggestion and observation**: Given that CBD/SBSTTA/24/INF/11 defines connectivity as 'structural' and 'functional', we propose to organise the monitoring elements around these concepts as follows: "Trends in structural connectivity (terrestrial, freshwater, marine)" and "Trends in functional connectivity (terrestrial, freshwater, marine)".
1	2	C	5	**We suggest:** ~~Continuous global~~ Absolute mangrove ~~forest~~ cover. **Why:** It will be important to analyze the dynamics of mangrove ecosystems well beyond continuous forest cover.
1	2	C	**Additional indicator suggested after row 7**	**We suggest:** Adding as an indicator the Human Footprint (HFP) Index (see Venter et al. 2016) under "Trends in Area of Mangroves" monitoring element. **Why**: The index will provide data on the impact of human activities over natural ecosystems from 2020 and on an annual basis; this index is included in the BIP document.

1	2	C	**Indicator in row 8 suggested to move after row 23**	**We suggest:** Moving this indicator right after row 23, in order to keep consistency between components and indicators. **Why:** We understand that the "live coral cover" indicator is designed to measure coral reef ecosystem integrity, and as such this indicator would fit better under the monitoring element on "Fragmentation and Quality of Coral Reef Ecosystems" and the component "Ecosystem Integrity and Connectivity (terrestrial, freshwater and marine ecosystems)". More information about the International Coral Reef Initiative (ICRI) on coral reef-related indicators, click here.
1	2	D	12	**We suggest:** To update baseline to 2015. **Why:** Availability of updated data and information on this indicator and its updated baseline can be found here at BIP Indicators (more information click here).
1	2	C	**Additional indicator suggested after row 14**	**We suggest adding:** Mountain Green Cover Index as a new indicator called "Change on the Extent of Wetland as Part of Total Mountain Area", under the monitoring element "Trends in Wetlands" and under the component of the 2050 goal "Increased Extent of Natural Ecosystem (terrestrial, freshwater and marine ecosystems)" (A1). **Why:** This indicator is also very relevant to monitor the evolution of wetlands and its interrelation with other factors (e.g. climate change).
1	2	C	**Additional indicator suggested after row 14**	**We suggest adding:** Human Footprint (HFP) Index (see Venter et al. 2016) under "Trends in Wetlands" monitoring element. **Why**: The index will provide data on the impact of human activities on natural ecosystems from 2020 and on an annual basis; this index is included in the BIP document.
1	2	C	15	**We suggest adding:** Ecosystem Intactness Index (EII) under the monitoring element "Trends in Fragmentation and Quality of Forests Ecosystems" and under the component of the 2050 goal "Increased Extent of Natural Ecosystem (terrestrial, freshwater and marine ecosystems)" (A2). **Why:** This index now has an updated baseline for 2020, and will provide updates annually (more information here), as indicated by the UNEP-WCMC/BIP document).
1	2	C	15	**We suggest adding:** Forest Specialist Index (FSI/LPI). **Why:** This indicator is included in the UNEP-WCMC/BIP Information Document, it has been published in a peer reviewed journal: Green et al, 2020).

1	2	C	**Additional indicator suggested after row 15**	**We suggest:** Adding Forest Landscape Integrity Index (FLII). **Why:** While this index is under review at the time of the submission of this document, we understand this indicator will provide data annually for the period of 2020-2030. More information click here.
1	2	B	**Additional indicator suggested after row 15**	**We suggest adding:** River Connectivity Status Index (CSI), under the monitoring element "Trends in Fragmentation and Quality of Forests Ecosystems" and under the component of the 2050 goal "Ecosystem Integrity and Connectivity (terrestrial, freshwater and marine ecosystems)" (A2). **Why:** We understand that adding rivers in the monitoring will provide a full picture of our ecosystems, along with terrestrial and marine connectivity indicators. Fluvial connectivity encompasses longitudinal (river channel), lateral (floodplains), vertical (groundwater and atmosphere) and temporal (intermittency) components. The CSI is a peer-reviewed indicator that can measure a number of pressure indicators, such as river fragmentation (DOF), flow regulation (DOR), urbanization, road development, water consumption, and sediment trapping. More information here.
1	2	D	15	**We suggest adding:** SDG Indicator 15.2.1 (progress towards sustainable forest management). **Why:** This indicator measures progress towards sustainable forest management (SFM) through five sub-indicators. As an aid to interpretation, a dashboard of traffic lights is used with green, yellow and red indicating the direction and rate of change in each of the sub-indicators. The indicator will contribute to track progress towards SDG Target 15.2. More information here.
1	2	C	15	**We suggest adding**: Change in connectivity between different ecosystems, within the monitoring element "Trends in Fragmentation and Quality of Forest Ecosystems. **Why:** Linkages and connectivity between different types of ecosystems across several landscapes should be reflected in the framework (see as reference International Partnership for the Satoyama Initiative - IPSI).
1	2	C	15	**We suggest adding:** Bioclimatic Ecosystem Resilience Index. **Why:** See (BERI) to assess the extent to which a given spatial configuration of natural habitat will promote or hinder climate-induced shifts in biological distributions (more information here).

1	2	C	15	**We suggest adding:** Trends in observed emigration, immigration, or dispersal rates for measuring the intensity of animal movement between core habitat areas **Why:** The functional grain of resource patches in the landscape is a crucial factor shaping individual movements, and therefore influencing landscape connectivity.
1	2	C	15	**We suggest adding:** Local permeability of landscapes to animal movement. **Why:** See Human Modification map (HM) - more information here.
1	2	C	15	**We suggest adding:** Trends in observed emigration, immigration, or dispersal rates for measuring the intensity of animal movement between core habitat areas. **Why:** The functional grain of resource patches in the landscape is a crucial factor shaping individual movements, and therefore influencing landscape connectivity.
1	2	C	15	**We suggest adding: I**ncrease in functional connectivity between core habitat areas documented in NBSAPs. **Why:** Landscape connectivity can be viewed from two perspectives that could be considered as extremes of a gradient: functional connectivity (refers to how the behavior of a dispersing organism is affected by landscape structure and elements) and structural connectivity (depends on the spatial configuration of habitat patches in the landscape like vicinity or presence of barriers).

1	2	C	16	**We suggest adding:** Change in biodiversity-friendly landscape-level agricultural practices. **Why**: An indicator of biodiversity trends in landscape-level and in situ agricultural practices, including small-holder farming, agricultural biodiversity conservation measures, agroecology, low-chemical-input agriculture, and others. We believe the framework's indicators should include an indicator or a set of indicators to encompass cultural landscapes, for example based on designation of landscapes including under UNESCO's Man and Biosphere Programme and Cultural Landscapes under the World Heritage Convention, FAO's Globally Important Agricultural Heritage Systems (GIAHS) Programme, IUCN's landscape categorization system, and others, including areas not covered by these mechanisms as appropriate. Furthermore, in light of the demonstrated fact that many IPLCs are keepers of biodiversity through maintenance of landscapes that function as multifunctional social-ecological systems, any post-2020 biodiversity targets and indicators regarding IPLC issues should explicitly reference nature-culture links at the landscape level. The International Partnership for the Satoyama Initiative - IPSI could play a key role in the creation and monitoring of them.
1	3	D	20	**We suggest**: **2000-**2015**, every four years.** **Why:** The UNCCD is the custodian agency for SDG indicator 15.3.1 ("Proportion of Land That is Degraded Over Total Land Area") to monitor progress towards achieving SDG target 15.3. Data available is 2000-2015, and updates are released every four years (next planned update 2022), using as methodology the scientific conceptual framework for LDN, endorsed at COP13, which underpins a universal methodology for deriving the indicator. The indicator is derived from a binary classification of land condition (i.e., degraded or not degraded) based on three sub-indicators (and associated metrics): land cover (land cover change), land productivity (land productivity dynamics) and carbon stocks (soil organic carbon stocks). More information here. Lastly, sub-indicators outlining in detail the level and type of degradation in different ecosystems would help to track progress with precision.
1	2	C	**Additional indicator suggested after row 21**	**We suggest adding:** Ecosystem Intactness Index (EII) under the monitoring element "Trends in Fragmentation and Quality of Dry and Sub-humid Lands, Grasslands and Other Terrestrial Ecosystems" and under the component of the 2050 goal "Increased Extent of Natural Ecosystem (terrestrial, freshwater and marine ecosystems)" (A2). **Why:** This index now has the updated baseline for 2020, to provide updates annually (more information here), as indicated by the UNEP-WCMC/BIP document).

1	2	C	**Additional indicator suggested after row 23**	**We suggest adding:** Ecosystem Intactness Index (EII) under the monitoring element "Trends in Fragmentation and Quality of Mangroves" and under the component of the 2050 goal "Increased Extent of Natural Ecosystem (terrestrial, freshwater and marine ecosystems)" (A2). **Why:** This index now has an updated baseline for 2020, to provide updates annually (more information here), as indicated by the UNEP-WCMC/BIP document).
1	3	C	**Additional indicator suggested after row 24**	**We suggest adding**: Reef fish abundance and biomass (under "Element Trends in Fragmentation and Quality of Coral Reefs"). **Why**: Per recommendations from the International Coral Reef Initiative (ICRI) on coral reef-related indicators (more information here).
1	3	C	**Additional indicator suggested after row 24**	**We suggest adding**: Fleshy algae cover and cover of key benthic groups (under "Element Trends in Fragmentation and Quality of Coral Reefs"). **Why**: Per recommendations from the International Coral Reef Initiative (ICRI) on coral reef-related indicators (more information here).
1	3	C	29	**We suggest**: Number of species extinctions. ~~(birds and mammals)~~ **Why**: The indicator should apply to a broader scope, well beyond these two groups of species.
1	3	C	30	**Methodological suggestion and observation**: Preventing extinction is related to action - not outcome.
1	3	C	**Additional indicator suggested after row 31**	**We suggest adding:** The IUCN Green Status of Species for the upcoming indicator for recovery of species. **Why**: The IUCN Green Status of Species aims to complement the IUCN Red List by providing a tool for assessing the recovery of species' populations and measuring their conservation success.
1	3	C	33	**Methodological suggestion and observation**: Species protection index is related to action - not outcome.
1	3	B	**Additional indicator suggested after row 34**	**We suggest**: Trends in **native** species abundance. **Why**: In order to keep specificity and precision, the monitoring framework should be explicit that this monitoring element is only for native species, not for invasive, introduced or non-native ones.
1	3	C	**Additional indicator suggested after row 35**	**We suggest adding:** The IUCN Green Status of Species. **Why**: As commented before, the IUCN Green Status of Species aims to complement the IUCN Red List by providing a tool for assessing the recovery of species' populations and measuring their conservation success.

1	4	B	37	**We suggest**: Trends in the diversity of cultivated plants, farmed and domesticated animals**, including small scale marine and freshwater species in fisheries and aquaculture.** **Why**: We suggest in the element "Trends in the Diversity of Cultivated Plants, Farmed and Domesticated Animals" to include small scale marine and freshwater species in fisheries and aquaculture since it provides sustainable livelihoods in some countries. Global indicators are missing, but national, regional or "proxy" indicators could guide the international community to design and articulate a global one. One valid reference to start that articulation could be the Caribbean Network of Fisherfolk Organizations (CNFO), more information here.
1	4	C	37	**We suggest:** ~~Comprehensiveness of~~ **Trends in** conservation of socioeconomically as well as culturally valuable species. **Why:** We suggest a change in the wording since the scope of "comprehensiveness of conservation of…" is not clear, nor automatically understood. The term for "Trends in conservation of…" is preferred, thus the suggested change.
1	4	D	37	**We suggest:** 2018; ~~every 3-5 years~~ **annually** **Why:** The more relevant the resources to be conserved, the more frequently should their conservation state be assessed.

1	4	C	**Additional indicator suggested after row 38**	**We suggest adding**: Trends in *in situ* conservation of plant and animal genetic resources for food and agriculture. **Why:** Traditional agriculture is where IPLCs are present as guardians of natural resources and genetic resources, as well as of the traditional knowledge associated with their use *(term for natural resources)* and utilization *(term for genetic resources)*. It's important to acknowledge the diversity of plant and animal genetic resources for food and agriculture conserved in situ by traditional farming methods, especially FAO's Globally Important Agricultural Heritage Systems (GIAHS), which according to FAO are outstanding landscapes that combine agricultural biodiversity, resilient ecosystems and a valuable cultural heritage. Located in specific sites around the world, they sustainably provide multiple goods and services, food and livelihood security for millions of small-scale farmers. Unfortunately, these agricultural systems are threatened by many factors including climate change and increased competition for natural resources. IPLCs are also dealing with migration due to low economic viability, which has resulted in traditional farming practices being abandoned and endemic species and breeds being lost. These ancestral agricultural systems constitute the foundation for contemporary and future agricultural innovations and technologies. Their cultural, ecological and agricultural diversity is still evident in many parts of the world, maintained as unique systems of agriculture. It's time to recognize the achievements of IPLCs on agrobiodiversity conservation and secure their rights to continue to do so. More information here.
1	4	B	**Additional monitoring element suggested after row 41**	**We suggest:** Trends in the empowerment of rights holders regarding genetic resources and associated traditional knowledge. **Why:** as commented above.
1	4	C	**Additional indicator suggested after row 41**	**We suggest: Trends in** global, regional and local state of traditional knowledge (under the suggested monitoring element Trends in the empowerment of rights holders). **Why**: as commented before. This indicator can be based on Local Biodiversity Outlooks.
1	4	C	41	**Methodological suggestion and observation**: Conservation is related to action, not outcome.
1	4	C	41	**We suggest:** ~~Comprehensiveness of~~ **Trends in** conservation of socioeconomically as well as culturally valuable species. **Why:** The scope of "comprehensiveness of conservation of…" is not clear, nor automatically understood. The term for "Trends in conservation of…" is preferred, thus the suggested change.

1	4	D	41	**We suggest:** 2018; ~~every 3-5 years~~ **annually** **Why:** The more relevant the resources to be conserved, the more frequently should their conservation state be assessed.
1	4	C	**Additional indicator suggested after row 41**	**We suggest adding:** The IUCN Green Status of Species. **Why**: As commented before, the IUCN Green Status of Species aims to complement the IUCN Red List by providing a tool for assessing the recovery of species' populations and measuring their conservation success.
1	4	A	42	**We suggest:** ~~Protection~~ **No further loss** of critical ecosystems. **Why**: This element needs reworking in order to bring coherence and keep this goal SMART, although the main problem is in the way that the goal was articulated. The element here should guide indicators to measure ultimate outcomes toward the milestones. A description of actions taken doesn't necessarily reflect progress (e.g. not all protected areas necessarily deliver a good biodiversity outcome). Furthermore, the vague mention of some of the indicators (such as "protected areas") without clearly defining whether it follows the IUCN categories I-IV, and omiting to monitor conserved areas categories V-VI adds confusion and creates space for misleading data in the monitoring phase.
1	4	C	42-49	**Methodological suggestion and observation**: All indicators, apart from 47, refer to protected areas and these are actions, not outcomes.
1	4	C	42-50	**Methodological suggestion and observation**: As commented above, all the indicators under A 6 should measure the state of ecosystems, with articulations that track the state of them (e.g. "retention of protected area coverage of KBA"). Data sourcing that can suggest adding indicators that read: (a) Living Planet Index (LPI) (a) Ecosystem Intactness Index (EII) (b) Biodiversity Intactness Index (BII) (c) Biodiversity Habitat Index (BHI) (d) Ecosystem Health Index (EHI)

1	4	C	**Additional indicator suggested after row 43**	**We suggest adding:** Coverage of Indigenous and Community Conserved Areas (ICCAs). **Why:** This monitoring framework should provide greater recognition to ICCAs in order to provide a more efficient tracking of progress. While ICCAs are one of four governance types of both protected areas and OECMs, there's a merit to having a distinct indicator given its three essential characteristics and the growing evidence of its effectiveness. These characteristics are: (a) An Indigenous people or local community possesses a close and profound relationship with a site [territory, area or habitat]; (b) The people or community is the major player in decision-making related to the site and has *de facto* and/or *de jure* capacity to develop and enforce regulations; and (c) The people's or community's decisions and efforts lead to the conservation of biodiversity, ecological functions and associated cultural and spiritual values, regardless of original or primary motivations. (Borrini-Feyerabend, 2010; BorriniFeyerabend et al., 2014).
1	4	B	46	**We suggest:** Trends in **key biodiversity** areas of particular importance for ~~biodiversity conserved~~ conservation. **Why:** Goal A, component 6. KBAs represent the most comprehensive and systematic site-scale dataset of areas of particular importance for biodiversity. The Global Standard for their identification was developed through extensive consultations across the conservation community.
1	4	C	**Additional indicator suggested after row 47**	**We suggest adding:** Mountain Biodiversity Coverage Area (under the monitoring element Trends in areas of particular importance for biodiversity conserved). **Why**: SDG indicator 15.4.1 Coverage by protected areas of important sites for mountain biodiversity. This indicator shows temporal trends in the percentage of important sites for mountain biodiversity (i.e., those that contribute significantly to the global persistence of biodiversity) that are wholly covered by designated protected areas. This indicator is calculated from data derived from a spatial overlap between digital polygons for protected areas from the World Database on Protected Areas, Key Biodiversity Areas and mountains. The value of the indicator at a given point in time, based on data on the year of protected area establishment recorded in the World Database on Protected Areas, is then computed by dividing the total number of KBAs wholly covered by protected areas by the total number of KBAs in each country, and multiplying by 100. The metadata is available here.
1	4	C	48	**We suggest adding:** Global carbon stocks (under the monitoring element "Trends in Areas of Particular Importance for Ecosystems Services Conserved") **Why:** Since climate change is one of the biggest threats to biodiversity, this indicator is critical to have. There are several scientific institutions that can provide such data on an annual basis. This indicator is also key in tracking progress within the UNFCCC and SDGs processes.

1	4	C	48	**We suggest adding:** Percentage of OECMs under comprehensive inclusive management and governance **Why:** As an indicator for monitoring Trends in areas of particular importance for ecosystems services conserved. Comprehensive inclusive management and governance are social tools for biodiversity conservation.
1	**5**	**N/A**	**51-71** **GOAL B**	**A general comment on Goal B:** Overall, Avaaz notes a lack of clarity on hierarchies and consistency in the articulation of Goal B, its 2030 milestones, monitoring components, monitoring elements and indicators. The goal is too broad and needs a clearer and more detailed breakdown on milestones and consistency with monitoring components. We propose to focus this goal in safeguarding the benefits of nature for people and then adding an explicit mention of the Agenda 2030 and other instruments that will galvanize action. **For the purpose of reference, we suggest the following language:** **The benefits of** nature's contributions to **all** people have been valued, secured, protected, maintained ~~or~~ **and** enhanced through conservation and sustainable use, ~~supporting~~ the **2030 Agenda for Sustainable** ~~global~~ **D**evelopment ~~agenda for the benefit of all people~~ and **the support of** other biodiversity-related multilateral agreements. **Additional comment:**This goal should support (and be supported by) goals, targets and indicators across other biodiversity-related multilateral agreements, especially with the other two Rio conventions (UNFCCC and UNCCD). Furthermore, and in line with that which is expressed above, we suggest parties to consider, while sticking with specific mandates and responsibilities within the CBD, to further their effort to seek synergies and alignment with other biodiversity-related multilateral agreements, processes and instruments. Food security, access to safe drinking water and resilience to natural disasters cannot be delivered by this Convention alone: it will need a serious collaborative and coordinated action from multiple stakeholders across numerous sectors and processes to address the inseparable challenges of biodiversity loss, climate change, land degradation and unsustainable development that are caused by the same drivers and interdependent dynamics. We suggest connecting this goal and its milestones with the guiding directions of the Nationally Determined Contributions (NDCs, under UNFCCC) and Land Degradation Neutrality (LDN, under UNCCD) in order to ensure alignment and facilitate the delivery of the GBF mission; setting measurable targets for nature-based solutions and ecosystems based-approaches to climate change and desertification. Avaaz also encourages connecting this goal with other strategic frameworks, such as CITES, UNCL, CMS, Ramsar, Sendai, UNFF, ITPGR and others. In particular, Avaaz is concerned that the climate dimension is no longer part of the goal. In order to keep the planet under 1.5C, the CBD should

				play an integral role to support the mandate of the UNFCCC. At the same time, science is clear that the success to advance the mandate of the CBD will largely depend on keeping the planet under 1.5C, hence both conventions should play clear, distinct yet complementary roles to advance their specific mandates.
1	5	B	**Additional monitoring element after row 53**	**We suggest:** Trends in habitat restoration. **Why:** See UNFF's monitoring framework and the New York Declaration on Forests.
11	55	CC	**Additional indicator suggested after row 53**	**We suggest:** Impact of restoration programmes. **Why:** See UNFF's monitoring framework and the New York Declaration on Forests.We suggest: Impact of restoration programmes. Why: See UNFF's monitoring framework and the New York Declaration on Forests.
1	5	C	51	**We suggest:** ~~Number~~ **Area** of certified forests ~~areas~~ under sustainable management with verified impacts on habitat conservation/restoration. **Why:** An indicator should measure the area covered by certified forests under sustainable management, not the quantity of certified forests.
1	5	C	**Additional indicator suggested after row 51**	**We suggest adding:** Percentage of protected and conserved areas under effective inclusive governance and management based on traditional knowledge and local cultures. **Why**: Based on the recommendations of IPBES 2019 global assessment report on the role of IPLCs in the positive outcomes for biodiversity. Furthermore, the Sharm El-Sheikh Declaration on Nature and Culture (CBD/COP/14/INF/46) states in one of the preambular paragraphs: "Emphasising that reversing the current trends in dramatic loss of biodiversity and the weakening of cultural diversity requires innovative approaches to bridge the artificial divide between biological and cultural diversity which persists in siloed sectoral practices, institutions, policy-making, management and interpretation" (more information here).
1	5	C	**55**	**We suggest adding:** Air pollution national regulation standards in place. **Why:** Ecosystems are impacted by air pollution, particularly sulphur and nitrogen emissions, and ground-level ozone as it affects their ability to function and grow. Emissions of both sulphur dioxide and nitrogen oxides deposit in water, on vegetation and on soils as "acid rain", thereby increasing their acidity with adverse effects on flora and fauna. Ultimately, acidification affects the ability of ecosystems to provide "ecosystem services", such as for example nutrient cycling and carbon cycling, but also water provision, on which the planet and human life is dependent. Increased ground-level ozone also causes damage to cell membranes on plants inhibiting key processes required for their growth and development. The loss of plant cover affects us all. Trees and other vegetation absorb pollutants such as excessive nitrogen dioxide, ozone

				and particulate matter, through their leaves and needles and thereby help to improve air quality. Less plant cover thus means less filtering capacity to clean our air. Eutrophication, the process of accumulation of nutrients, including nitrogen, in water bodies, often results from air pollution. Nutrient overloads in aquatic ecosystems can cause algae blooms and ultimately a loss of oxygen, and of life. As ecosystems are impacted, so is the biological diversity..
1	5-6	A-B-C	51-71	**Methodological suggestion and observation**: Components don't relate directly to milestones. Indicators have only a partial and indirect relationship to monitoring elements.
1	5	A-B	57	**Methodological suggestion and observation**: Indicators for ocean acidification could include pH, pCO2, total alkalinity, salinity, pressure and temperature.
1	5	C	57	**We suggest adding**: Ocean Health Index **Why**: A healthy ocean sustainably delivers a range of benefits to people now and in the future. The Ocean Health Index is the comprehensive framework used to measure ocean health from global to local scales.
1	5	C	60	**We suggest adding**: Trends in domestic and industrial water sanitation and treatment. **Why**: Water treatment and sanitation directly impacts coastal water quality, so the addition is key.
1	5	C	**Additional indicator suggested after row 62**	**We suggest adding**: Status of ecosystems relevant to the provision of flood protection **Why**: There are several models, methodologies and instruments that track this specific disaster risk reduction service that delivers flood protection (e.g. healthy mangroves or mountain ecosystems), both at the terrestrial and coastal levels.
1	6	B	**Additional monitoring element suggested after row 63**	**We suggest adding**: Trends in agricultural productivity and incomes of small-scale food producers, in particular women, indigenous peoples, family farmers, pastoralists and fishers, including through secure and equal access to land, other productive resources and inputs, knowledge, financial services, markets and opportunities for value addition and non-farm employment (under element B1). **Why:** In accordance with SDG 2, target 2.3.
1	6	B	**Additional monitoring element suggested after row 63**	**We suggest adding**: Trends in volume of production per labour unit by classes of farming/pastoral/forestry enterprise size (under element B1). **Why:** In accordance with SDG 2 indicators: target 2.3, indicator 2.3.1.

1	6	B	**Additional monitoring element suggested after row 63**	**We suggest adding:** Trends in average income of small-scale food producers, by sex and indigenous status (under element B1). **Why:** In accordance with SDG 2 indicators: target 2.3, indicator 2.3.2.
1	6	B	**Additional monitoring element suggested after row 63**	**We suggest adding:** Trend in natural forest cover on restored landscapes (under component B.1) **Why:** In order to assess the impact of restoration efforts.
1	6	B	64	**We suggest**: Trends in the provision of energy supply from biological resources, **disaggregating/including in wood used as household fuel; agricultural residue, including that used as household fuel.** **Why**: Energy supply should be broadened to include fuel wood and agricultural residue used for burning as these comprise the energy supply for many people in LDCs and IPLCs.
1	6	B	65	**We suggest**: Trends in the provision of **sustainable and organic** food and feed from biodiversity (under the component B2, Nature's material contributions including food, water and others). **Why**: This element could open up for unsustainable practices with unintended consequences for the objectives of the convention and human health. The CBD should provide a very precise set of monitoring elements that ensure consistency with at least one of the three convention's objectives, while ensuring that any contribution to the SDGs is done within CBD's mandate. Therefore, in this case the monitoring element should be explicit on the sustainable use.
1	6	C	65	**We suggest adding:** proportion of agricultural area under intensive and sustainable agriculture (SDG indicator 2.4.1) **Why:** Biodiversity is integral to ecosystem health, essential to the sustainable increase of food production and necessary to build resilient livelihoods (more information here).
1	6	C	65	**We suggest adding:** Proportion of depleted fish stocks with recovery plans in place and under implementation; **Why:** Marine and inland aquatic ecosystems represent the most biodiverse sources of food consumed by humans. Yet, pollution, habitat loss and degradation, draining wetlands, coastal development, overfishing river fragmentation, invasive species and poor land management are threatening their biodiversity and health.

1	6	C	65	**We suggest adding:** Trends in threads for genetic resources for food and agriculture. **Why:** Climate change, land-use change, IAS, and is having an effect on genetic resources for food and agriculture and on ecosystem services.FAO reports on the State of the World's Plant Genetic Resources for Food and Agriculture provide a comprehensive overview of trends in PGRFA conservation and use around the world. The reports document the status of plant genetic resources diversity, conservation and use, as well as the extent and role of national, regional and international efforts that underpin the contributions of PGRFA to food security. They highlight the most significant changes that have occurred in the sector since 1996, when the first report on The State of the World's Plant Genetic Resources for Food and Agriculture was produced by FAO, as well as the gaps and needs that remain for setting future priorities.
1	6	C	**Additional indicator suggested after row 65**	**We suggest adding:** Percentage of food production based on agroecological and sustainable systems. **Why:** In line with the Updated plan of action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity **(**See Avaaz comments on Updated plan of action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity - SBSTTA 24 peer review**)**.
1	6	B	**Additional monitoring element suggested after row 65**	**We suggest adding:** Trends in behavioural change relating to cultural and consumer patterns on biodiversity across all ages and socio-economic sectors. **Why:** As mentioned in general comments. To outline the changes in our daily life and the consumption patterns necessary to save biodiversity. The extent to which such changes which would be needed in our daily life and consumption to save biodiversity have been adopted**.**
1	6	C	**Additional indicator suggested after row 65**	**We suggest adding:** State of ecosystems relevant to the provision of food security for vulnerable social groups. **Why**: In relation to the previous suggestion, it's important to monitor the areas that are sources of nutrition (food-related ecosystems).
1	6	C	65	**We suggest adding:** Proportion of depleted fish stocks with recovery plans in place and under implementation; **Why:** Marine and inland aquatic ecosystems represent the most biodiverse sources of food consumed by humans. Yet, pollution, habitat loss and degradation, draining wetlands, coastal development, overfishing river fragmentation, invasive species and poor land management are threatening their biodiversity and health.

1	**6**	**N/A**	**72-76** **GOAL C**	**A general comment on Goal C:** Avaaz notes with deep concern that the term "traditional knowledge" is no longer at the goal level, which contradicts the latest scientific recommendations from the 2019 IPBES global assessment: "Recognizing the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities, and ensuring their inclusion and participation in environmental governance, often enhances their quality of life and the conservation, restoration and sustainable use of nature, which is relevant to broader society." For this reason, the post-2020 biodiversity framework should have a clear and implementable goal and targets to support community conservation, including policy measures that recognize the role, rights, traditional knowledge, collective actions and customary sustainable use practices of groups like women and Indigenous Peoples in mainstreaming biodiversity conservation. **For the purpose of reference, we suggest the following language:** The benefits, from utilization of genetic resources are shared fairly and equitably **by all parties, stakeholders and rights-holders**. **Additional comment:** Avaaz is well aware that this goal is aimed at the third objective of the CBD, but wishes to make a point that there are no binding considerations for the equitable share of benefits arising from the sustainable use of the other components of biodiversity: ecosystems and natural resources. The GBF should at least set a goal in starting such a process.
1	6	C	75	**We suggest:** Number of Biocultural Community Protocols under the Nagoya Protocol. **Why:** Biocultural Community Protocols and free, prior informed consent are powerful rights-based approaches and tools for ABS and for putting the Nagoya Protocol into practice — linking economic, social and ecological objectives, while supporting marginalised communities as they defend their rights to land and resources. CBD ABS provisions related to Article 8j,10c and provisions of the Nagoya Protocol can realize benefit sharing at the community level.
1	6	C	74	**We suggest adding**: Trends in the benefits from access to genetic resources shared with IPLCs. **Why**: IPLCs are guardians of genetic resources, especially regarding their in situ conservation and evolution, a paramount element of facing changes, including climate change
1	6	C	**Additional indicator suggested after row 74**	**We suggest adding**: Total value in monetary and non-monetary benefits shared under ABS agreements. **Why**: Transparency should be considered as a relevant tool for biodiversity conservation.

1	**6**	**N/A**	**77-85** **GOAL D**	**A general comment on Goal D:** This goal needs stronger language to ensure means of implementation are fully in place by 2022. **For the purpose of reference, we suggest the following language:** Means of implementation is available to achieve all goals and targets of the framework i) By 2022, **all** means to implement the framework for the period 2020 to 2030 are **fully** identified or committed. ii) By 2030, **all** means to implement the framework for the period 2030 to 2040 are **fully** identified or committed. **Additional comment:** This goal is very relevant to targets 17 and 18, and some indicators outlined there could be useful to have as reference or proxy indicators for this goal.
1	6	B	**Additional monitoring element suggested after row 80**	**We suggest adding:** Trends in public domestic resource mobilization (under component D.1). **Why:** As commented at Goal D and overall in general comments.
1	6	C	**Additional indicator suggested after row 80**	**We suggest adding:** Revenue generated from biodiversity-relevant financial instruments (under new element suggested above) **Why**: Important to consider taxes, fees, adjusted capital requirements, biodiversity-themed green bonds, biodiversity-based funds, lending for natural infrastructure solutions.
1	6	C	**Additional indicator suggested after row 77**	**We suggest adding:** Percentage of financial resources redirected from harmful incentives and investments. **Why:** As commented in Goal D.
1	6	C	**Additional indicator suggested after row 77**	**We suggest:** Tracking the impact of GEF supported projects on the GFB goals and objectives should be included in this monitoring framework. **Why:** As commented in Goal D.
1	6	C	**Additional indicator suggested after row 77**	**We suggest:** Trends in number of parties with a complete assessment of financial needs to deliver NBSAPs and other initiatives relevant for biodiversity. **Why:** As commented in Goal D.
1	6	C	**Additional indicator suggested after row 77**	**We suggest:** Amount of financial resources needed for IPLCs to deliver conservation and sustainable use. **Why:** As commented in Goal D.

1	6	C	**Additional indicator suggested after row 78**	**We suggest adding:** Financial resources mobilization for economic instruments that support biodiversity, including from domestic public sector budgets (under Trends in public domestic resource mobilization) **Why:** As commented above
1	7	C	79	**We suggest adding:** Trends in financial resources allocated to comply with pledges and other commitments on biodiversity conservation and sustainable use. **Why**: As commented in Goal D.
1	7	C	80	**We suggest:** Trends in the mobilization of financial resources from ~~charitable~~ **civil society and non-governmental** organizations. **Why**: The third sector is much bigger than charities, and there are a number of advocacy organizations ready to work on transformational policies at the global, regional, national and local level.
1	6	C	**Additional monitoring element suggested after row 80**	**We suggest adding:** Trends in financial flows aligned with biodiversity conservation and restoration. **Why:** In light of anticipatory risk management and the exploration of new business areas, biodiversity is of key importance for the financial sector.
1	7	B	81	**We suggest:** D2. Sufficient capacity building, technology transfer and scientific cooperation**, resulting in positive change for biodiversity.** **Why:** The monitoring element should reflect a qualitative dimension and positive and transformational impact intended to deliver the objectives of the convention.
1	7	C	82	**We suggest adding:** Capacity building initiatives addressing and integrating the needs of different rights-holders, considering local cultural circumstances. **Why**: Capacity building activities should focus on the needs and circumstances of those to whom they are intended, and not set plans or goals of those providing them.
1	7	C	83	**We suggest adding:** Trends in technology transfer programmes that effectively implement the GBF while ensuring equitable governance. **Why**: Technology transfer for biodiversity conservation should be implemented and its impact should be assessed.
1	7	C	84	**We suggest adding:** Impact on biodiversity conservation of scientific cooperation initiatives South-South, *ad intra / ad extra* East-South and North South. **Why**: The GBF targets and its 2050 vision can only become reality with an increase in innovative forms of partnership, such as South-South cooperation complementing North-South arrangements, particularly with

				the increased recognition of the contribution of developing countries in areas such as technology, resources and capacity. After all, it must be remembered that the 130 members of the Group of 77 are CBD Parties, and they are the stewards of the majority of our global biodiversity.
1	7	C	85	**We suggest adding:** Impact on biodiversity conservation of technology transfer knowledge hubs, databases and data/information sharing. **Why**: As commented before.
1	**6**	**N/A**	***GOAL E*** **New goal suggested**	**General comment on this goal suggestion:** In order to improve the set of indicators and elements for this monitoring framework, parties should consider an addition of a specific goal related to traditional knowledge, Avaaz suggests including the following goal: **For the purpose of reference, we suggest the following language:** **By 2030, traditional knowledge, innovations and practices of Indigenous Peoples and local communities relevant for the conservation and sustainable use of biodiversity, and their customary use of biological resources, are fully integrated and reflected in the implementation of the GBF with the full and effective participation of Indigenous Peoples and local communities, at all relevant levels.** **Additional comment**: Elevating traditional knowledge into a goal level would play a significant transformational role in the whole framework and will bring new perspective in the global policy fora.

SPECIFIC COMMENTS TABLE 2 (TARGETS)

Table	Page	Column letter	Row number	COMMENT
2	**8-9**	**N/A**	**1-34** **TARGET 1**	**A general comment on Target 1:** We note with concern that the articulation of this target is weaker than the language at the zero draft. Avaaz believes that, in order to fulfill the mission of the 2030 Agenda and the GBF, 100% of the planet should be under inclusive and comprehensive spatial planning in which biodiversity is considered as a strategic infrastructure for food, water and health security of all our societies. By only aiming 50% of spatial planning, we'd risk leaving behind unaddressed key biodiversity areas and ecologically or biologically significant areas that will be crucial to deliver the 2050 goals. Furthermore, this target needs specificity on what needs to be under such planning: sub-targets on (i) restoration, (ii) curbing unsustainable agriculture, forestry, fisheries, tourism, and production and consumption patterns of other productive sectors and (iii) addressing urban and other impacts related to cities would help parties to discuss with precision the target as well as its elements, components and indicators.

				For the purpose of reference, we suggest the following language: "By 2030, [~~50~~**100%**] of land and sea areas globally, **including Key Biodiversity Areas, connectivity zones and other sites of biodiversity importance**, are under spatial **and sound, rights-based and equitable community governance** planning that addresses land/sea use change, retaining ~~most of the~~ existing intact and wilderness areas, and allow to restore **in extent and integrity of** ~~[X%]~~ **at least 50%** of degraded freshwater, marine and terrestrial natural ecosystems and connectivity among them**, while halting and reversing the decline of critical and vulnerable ecosystems and habitats, delivering a net increase in area**. **Additional comment**: Avaaz believes that a comprehensive and proper spatial planning should fully take into account the identification of Key Biodiversity Areas (KBAs), which will ensure specificity and alignment between Parties in implementation. Given that the KBA standard does not cover connectivity zones, and that there is a separate standard for identifying such areas, reference to both KBAs and connectivity zones is important (see more information in Post-2020 Framework: A Transformational Approach Avaaz's response to the zero draft of the post-2020 global biodiversity framework, pages 17 and 18).
2	8	B	1	**We suggest**: Trends in area under spatial land-use plans**, in particular freshwater and terrestrial ecosystems.** **Why**: The monitoring element should be explicit on what will be under spatial planning and indicators should be consistent with the monitoring element, which is not the case in this document (see row 1 and 2).
2	8	C	**Additional indicator suggested after row 1**	**We suggest:** Percentage of spatial plans utilising information on key biodiversity areas (under component T1.1) **Why:** Proposed by BIP would help CBD track progress in achieving these targets and goals.
2	8	C	**Additional indicator suggested after row 2**	**We suggest adding:** KBA integrated in active and ongoing spatial planning at local, national and/or regional levels. **Why:** There's a strategic need for the GBF, in particular for this monitoring framework, to include a specific indicator that measures the number of KBAs that are identified, incorporated and mainstreamed in local and/or national spatial plans following global standards. The KBA Partnership could be the entity that can track this.
2	8	C	**Additional indicator suggested after row 2**	**We suggest:** Transboundary KBA integrated in regional spatial planning or conservation cooperation schemes. **Why:** See previous comment. KBAs should also be identified in transnational/trans-boundaries spatial plannings, across multiple ecosystems regardless of political borders.

2	8	B	**Additional monitoring element suggested after row 5**	**We suggest adding:** Trends in ecological corridors area and consideration in spatial land use planning. **Why:** to ensure land/sea use in those areas is compatible with its ecological connectivity function." The recently released IUCN Guidelines for Connectivity Conservation provides robust guidance on delineating ecological corridors, and ensuring their functionality (more information)
2	8	A	6	**We suggest**: No habitat loss or fragmentation from land/sea use change. **Why**: This component should include "no loss" as a north-star, building from the spirit of Aichi Target 5.
			Additional indicators suggested after row 7	**We suggest adding:** The following indicators: Living Planet Index (LPI), Human Footprint (HFP), Biodiversity Intactness Index (BII), Forests Landscape Integrity Index (FLII), Index and Ecosystem Health Index (EHI), under the element "Under Trends in Extent and Rate of Change of Forests Ecosystems." **Why**: The monitoring framework should focus on results and action-oriented measurement of ecosystems' connectivity, extent and integrity and its indicators should be consistent and have an order of relevance and coherence across different elements, having distinct categories under the same analysis hierarchies.
2	8	C	**Additional indicator suggested after row 7**	**We suggest adding:** Global Annual Gross Tree Cover Loss (by Ha) **Why:** see Hansen/GFW
2	8	C	**Additional indicator suggested after row 7**	**We suggest adding:** Annual Tropical Primary Tree Cover Loss (by Ha) **Why:** University of Maryland could be the source of this indicator (see NYDF Indicators for Goal 1: more information)
2	8	C	8	**We suggest adding**: OECD data on land cover change in countries and regions (more information here). **Why**: This indicator is very relevant to this target, it enables the monitoring of changes in all terrestrial ecosystems.
2	8	C	**Additional indicators suggested after row 8**	**We suggest adding:** The following indicators: Living Planet Index (LPI), Human Footprint (HFP) Index and Ecosystem Health Index (EHI), under the element "Trends in Extent and Rate of Change of Dry and Sub-humid Lands". **Why**: As commented before.

2	8	C	**Additional indicators suggested after row 10**	**We suggest adding:** The following indicators: Living Planet Index (LPI), Human Footprint (HFP) Index and Ecosystem Health Index (EHI), under the element "Trends in Extent and Rate of Change of Other Terrestrial Ecosystems". **Why**: As commented before.
2	8	C	**Additional indicator suggested after row 10**	**We suggest adding:** The following indicators: reef fish abundance and biomass. **Why**: As per recommendations from the International Coral Reef Initiative (ICRI) on coral reef-related indicators (more information here).
2	9	B	**Additional monitoring element suggested after row 18**	**We suggest adding:** Trends in Deep sea ecosystems conservation **Why:** Since 2003, the protection, conservation and sustainable use of habitats, ecosystems and biodiversity in the deep sea and high seas have been on the agenda of international meetings. However, our knowledge is insufficient, and the existing governance and management systems are inadequate, to develop, implement and enforce concerted, effective action.
2	9	C	**Additional indicator suggested after row 18**	**We suggest adding:** State of implementation of measures on deep sea ecosystems from States and international institutions **Why:** See UNGA resolutions on VMEs (resolutions 61/105, 64/72, 66/68, 71/123, and posterior reviews
2	9	C	**Additional indicator suggested after row 18**	**We suggest adding:** the FAO International Guidelines for the Management of Deep-sea Fisheries in the High Seas **Why:** As commented before
2	9	B	**Additional indicator suggested after row 18**	**We suggest adding: Trends in the implementation of** the CBD Voluntary specific work plan on biodiversity in cold water areas within the jurisdictional scope of the Convention **Why:** As mandated by CBD COP Decision XIII/11
2	9	B	21	**Methodological suggestion and observation**: Agriculture and forest are listed in the same monitoring element which presents technical challenges for analysis and measurement. Avaaz suggests to disaggregate them and split into two different monitoring elements.
2	9	B	21	**We suggest:** Trends in ~~forest and~~ agriculture lands as a proportion of total land area. **Why**: As commented before.

2	9	B	**Additional monitoring element suggested after row 21**	**We suggest:** Trends in forest ~~and agriculture~~ lands as a proportion of total land area. **Why**: As commented before. Indicator under this monitoring element should be the one outlined on row 22 [Forest Area as proportion of total land area (SDG indicator 15.1.1)].
2	9	B	**Additional indicator suggested after row 22**	**We suggest:** Global Annual Gross Tree Cover Loss (Ha) **Why:** See Hansen/Global Forest Watch
2	9	B	**Additional indicator suggested after row 22**	**We suggest:** Annual Tropical Primary Tree Cover Loss (Ha) **Why:** See Univ of Maryland (see NYDF Indicators for Goal 1: more information)
2	9	C	**Additional indicator suggested after row 22**	**We suggest:** Agricultural area as proportion of total land area. **Why:** This would help to measure progress towards achieving zero conversion of natural ecosystems for agriculture.
2	9	B	**Additional monitoring element suggested after row 23**	**We suggest:** Trends in area change of Intact Forest Landscapes (IFLs) (under T1.4) **Why:** Intact Forest Landscape (IFL) are unbroken expanse of natural ecosystems within the zone of current *forest* extent, showing no signs of significant human activity and large enough that all native biodiversity, including viable populations of wide-ranging species, could be maintained.
2	9	C	**Additional indicator suggested after row 24**	**We suggest adding:** The following indicators: fleshy algae cover and cover of key benthic groups. **Why**: As per recommendations from the International Coral Reef Initiative (ICRI) on coral reef-related indicators (more information here).
2	9	C	**Additional indicators suggested after row 24**	**We suggest adding:** The following indicators: Living Planet Index (LPI), Human Footprint (HFP) Index and Ecosystem Health Index (EHI), under the element "Trends in Extent and Rate of Change of Mangroves". **Why**: The monitoring framework should focus on results and action-oriented measurement of ecosystems' connectivity, extent and integrity and its indicators should be consistent and have an order of relevance and coherence across different elements, having distinct categories under the same analysis hierarchies.

2	9	C	**Additional indicator suggested after row 24**	**We suggest adding:** Percentage of land degraded over total land area. **Why:** SDG 15.3.1 and UNCCD "Trends.Earth" monitors changes in primary productivity, land cover and soil organic carbon.
2	9	C	**Additional indicator suggested after row 24**	**We suggest adding:** Percentage of land and soil recovered by restoration projects. **Why:** SDG 15.3.1 and UNCCD "Trends.Earth" also monitors changes in primary productivity, land cover and soil organic carbon.
2	10	C	**Additional indicators suggested after row 29**	**We suggest adding**: Impact of community-led restoration initiatives and programs on biodiversity conservation, including biodiversity for agriculture and food production. **Why:** There are several unaccounted-for restoration initiatives led by IPLCs that need to be reflected and recognized. Furthermore, recommendations from the Food and Agriculture Organization (FAO) for biodiversity conservation-oriented management practices calls for the inclusion of community and farmers rights in this regard, including community-led seed banks. FAO and IPLCs rights organizations already have comprehensive data.
2	10	B	**Additional monitoring element suggested after row 24**	**We suggest adding:** Rate of forest cover and tree cover gain (hectares established over time) **Why:** See UNFF's monitoring framework and New York Declaration on Forests.
2	10	C	**Additional indicators suggested after row 24**	**We suggest adding:** See Natural forest cover gain from FLR (ha) **Why:** UNFF's monitoring framework and New York Declaration on Forests.
2	10	C	**Additional indicators suggested after row 24**	**We suggest adding:** Tree cover gain inside and outside the forest (ha) **Why:** UNFF's monitoring framework and New York Declaration on Forests.
2	10	B	**Additional monitoring element suggested after row 24**	**We suggest adding:** Impact of Forest landscape restoration efforts **Why:** See UNFF's monitoring framework and New York Declaration on Forests
2	10	C	**Additional indicators suggested after row 24**	**We suggest adding:** Finance for FLR activities for connectivity **Why:** See UNFF's monitoring framework and New York Declaration on Forests

2	10	C	**Additional indicators suggested after row 29**	**We suggest adding**: Socio-economic impacts of land/sea restoration projects and initiatives, especially regarding IPLCs lands and territories. **Why:** Community and farmers rights should be considered when biodiversity is irreparably damaged or lost in their lands and territories.
2	**10-12**	**N/A**	**35-52 TARGET 2**	**A general comment on Target 2:** Avaaz expresses concerns over the articulation of this target based on science and human rights grounds. (a) Observations on science grounds: It is important to clearly parse out the difference between total area targets and subset area targets: The Global Safety Net 1.0 (to be published in September 2020) shows that an overlay analysis of the 10 leading global-scale conservation priority regimes (including existing PAs) yielded a result of 29.9% of total land area as being "of particular importance for biodiversity." Parallel analyses of marine areas have yielded a similar figure of 30%. An additional 20% of total land area has been identified as "of particular importance for ecosystem services," namely carbon storage, as well as providing potential habitat for species migrating as a result of climate change. Not protecting these land areas could lead to further deforestation and land conversion that would likely result in an inability to stay below the dangerous threshold of 1.5C in global average temperature rise, at which point many biodiversity outcomes would become difficult, if not impossible, to achieve. Last year, a survey of over 335 conservation scientists from 81 countries done by the IUCN World Commission on Protected Areas' Beyond the Aichi Targets Task Force reported "very strong support for large-scale percentage area conservation targets, in the order of 50 percent of the Earth." And just a couple of months ago, a group of IUCN experts published another review of the literature, in which the call for 50% of the Earth is a midpoint of these values and is supported by a range of studies. Also last year the Global Deal for Nature (GDN) was launched. The GDN is a time-bound, science-driven plan to save the diversity and abundance of life on Earth, advising a set target of 30% of the Earth to be formally protected and an additional 20% designated as climate stabilization areas, totaling 50% of preserved areas by 2030, to stay below 1.5°C. That plan has been supported by hundreds of indigenous federations and grassroots organizations across Africa, Latin America, and Asia. Additionally, *In Bolder Thinking for Conservation*, scientists indicate that, from a precautionary perspective, 50% —slightly above the mid-point of recent evidence-based estimates (Fig. 1)—is scientifically defensible as a global target. (b) Concerns over human rights: as pointed out by several indigenous rights organizations throughout this process, the current presentation of the GBF targets contain no effective safeguards to protect the lands, rights and livelihoods of indigenous and other land-dependent communities in conservation programmes, which could violate UN norms and international law. Furthermore, the proposal fails to reflect the findings of the IPBES 2019 Global Assessment that existing protected areas are "not yet effectively or equitably managed" or the emphasis it

placed on the need to protect indigenous lands. Therefore, the current language of targets needs to be seriously reviewed.

As some of our partners pointed out, the 30% target is being set without a prior assessment of the social impacts and conservation effectiveness of the previous drive for 17% terrestrial protected areas (adopted by the Parties to the CBD in 2010). Protected areas have led to displacement and eviction of indigenous peoples and other land-dependent communities, and brought serious human rights abuses by conservation organisations and enforcement agencies. Despite provisions in the current CBD framework and draft post-2020 GBF to include 'Other Effective Area-Based Conservation Measures' in global conservation targets, experience has shown that state-owned, strict protected areas have often remained the default choice in much of the Global South. The GBF should be explicit in ensuring, in any part of its language articulation, that its implementation will be taking into account existing guidance on governance and equity (including the COP 14 decision on protected areas and OECMS).

For the purpose of reference, we suggest the following language:
By 2030, ~~protect and~~ **conserve through a well connected** ~~and effective~~ system of **equitably governed and effectively managed** protected areas, **ICCAs** and **OECMs** at least ~~30%~~ **50**% of ~~the planet with the focus on areas particularly important for biodiversity~~ **all land, freshwater and marine ecosystems.**

Additional comments: Avaaz is concerned about the lack of any reference to equitable governance in this target, which could open the door for violation of traditional, customary, indigenous and community rights, while contributing nothing to, or undermining, biodiversity outcomes. Recalling the Thematic Workshop on Area-Based Conservation Measures for the Post-2020 Global Biodiversity Framework, last December, and the lack of clarity on whether "protection" will include "free of human presence", Avaaz considers that this ambiguity should be addressed. As many of our partners rightly pointed out, human rights and land rights safeguards are essential to any protection target, if this Framework is to have a rights-based approach as noted in preambular text. Also, as reflected in a joint submission at that workshop, signed by Avaaz, CBD Alliance, Forests Peoples Programme, Friends of the Earth International, Global Youth Biodiversity Network and ICCA Consortium, "the 30 x 30 global area target alone is not sufficient to preserve biodiversity. The conservation community should be very careful in pushing for spatial targets without fully engaging with IPLCs."

(a) "Protection": In some cases, establishing protected areas has the effect of removing existing effective protections (as in the case of indigenous peoples traditional territories) and instituting instead government-led areas open to corruption and encroachment. This action therefore risks promoting violation of traditional, customary, indigenous and community rights, while contributing nothing to, or undermining, biodiversity outcomes. The notion of applying 'protection' remains undefined and it is

				open to promoting the violation of rights, if 'protection' is equated to 'completely free of human presence' under national legislation or de facto measures taken in national jurisdictions. Human rights and land rights safeguards are essential to any protection' target, if this framework is to have a 'rights-based' approach as noted in preambular text. Therefore, the very same target needs to include a reference to equitable governance and management of protected areas, in line with its policy predecessor Aichi target 11. (b) "Effective protection": the international community still has challenges in adequately accounting for 'effective' protection, where the protected area estate is not proven to be (or in places intended to be) effective at biodiversity protection. Furthermore, the increase in the number and scope of conventional protected areas, largely under direct government control, appears as achievement of this target, with little recognition that the gazetting of further protected areas may infringe on existing property rights, and may not contribute to actual effective protection.
2	10	A	35	**We suggest adding:** T2.1. Area of terrestrial, freshwater and marine ecosystem under protection and conservation, **including OECMs**. **Why**: Avaaz understands that, in order to communicate this target more effectively, OECMs should be noted explicitly, so parties can discuss in the near future monitoring elements and indicators with distinct quantitative sub-targets and data can be disaggregated accordingly.
2	10	B	35	**Methodological suggestions and observation**: The monitoring element trends of protected areas needs more clarification. As stated before, the definition of "protected areas" should be clearly defined at all levels for this framework (goals, target, component, monitoring elements and indicators). A definition of "protected area" will be appreciated by parties and observers, in particular IPLCs. Furthermore, Avaaz considers that, given the history between IPLCs and the implementation of many protected areas, it will be useful for the purpose of transparency in communication to provide that clarification, and start a deeper conversation around them. This is a key opportunity to make protected areas systems more inclusive and equitable, and follow the many existing COP decisions on governance issues. As many of our partners pointed out, protected areas should in all cases be properly designed in full partnership with indigenous peoples, clearly defined geographical spaces, equitably governed, and effectively managed through legal or other effective means to achieve the long term conservation of nature associated with ecosystem services and benefits for people's cultures and livelihoods.
2	10	C	**Additional indicator**	**We suggest adding:** Change in status of protected areas **Why:** There should be an indicator on protected areas downgrading, downsizing and degazettement (PADDD) to monitor this element within

			suggested under row 35	T2, given the importance of monitoring quality of areas under protection and other effective area-based conservation measures.
2	10	C	**Additional indicator suggested under row 37**	**We suggest adding:** Trends in illegal or unfair appropriation of land and natural resources and contested areas **Why**: The post-2020 area-based targets under CBD must not support "green grabs" and these should be accounted for. IPLC land and territories should not be included as part of Parties' contribution to the CBD GBF goals and targets, without their free, prior and informed consent, as the GBF should honor IPLCs self-determined governance and management of those areas, hence the need to monitor them, and for any illegal or unfair appropriation be accounted for. The CBD Secretariat and other relevant international institutions, in close collaboration with civil societies, IPLCs and Parties, should create a mechanism in which IPLCs can report contested areas, so these areas are not considered part of the contribution of the GBF until the parties involved settle a mutual consent. The ICCA Consortium, Forests Peoples Programme (FPP), Survival International, Rainforest Foundation UK, Protection International, Front Line Defenders, International Land Coalition and IWGIA already have information that has the potential to be consolidated in one set of data and create this indicator. The online tool Mapping For Rights could be one of the tools to inform this indicator.
2	11	C	**Additional indicator suggested after row 38**	**We suggest adding**: Trends in management effectiveness **of** Indigenous and Community Conserved Areas (ICCAs) **Why:** This monitoring framework should provide greater recognition to ICCAs in order to provide a more efficient tracking on progress and better information on land management or tenure, and it could lead to strengthening IPLCs rights. While ICCAs are one of four governance types of both protected areas and OECMs, there's a merit to having a distinct indicator given its three essential characteristics and the growing evidence of its effectiveness. These characteristics are: (a) An Indigenous People or local community possesses a close and profound relationship with a site [territory, area or habitat]; (b) The people or community is the major player in decision-making related to the site and has *de facto* and/or *de jure* capacity to develop and enforce regulations; and (c) The people's or community's decisions and efforts lead to the conservation of biodiversity, ecological functions and associated cultural and spiritual values, regardless of original or primary motivations. (Borrini-Feyerabend, 2010; Borrini-Feyerabend et al., 2014). More information here.
2	11	C	**Additional indicator suggested after row 42**	**We suggest adding**: Percentage of areas of particular relevance for biodiversity conservation (within T2.2) **Why**: It will be important to monitor PAs and OECMs that cover KBA and other important and relevant biodiversity areas that deliver direct or indirect ecosystem services for climate, food and water.

2	11	B	43	**We suggest:** Trends in ecological representativeness **and connectivity** of areas conserved. **Why**: Avaaz believes that it is key to retain the elements "ecologically representative" and connectivity together, both from an ecological and a sociocultural perspective, building from the spirit of Aichi Target 11.
2	11	C	**Additional indicator suggest after row 45**	**We suggest adding:** Biogeographic classification of ecological representativity. **Why:** See UNESCO. 2009. Global Open Oceans and Deep Seabed (GOODS) – Biogeographic Classification. Paris, UNESCO-IOC. (IOC Technical Series, 84.
2	11	B	**Additional monitoring element suggested after row 45**	**We suggest adding:** Trends in total area, number and quality of OECMs. **Why:** Not only trends in ecological representativeness should be measured; OECMs address a broader set of objectives that should be measured to assess the "representative system" of column A.
2	11	C	**Additional indicator suggested after row 45**	**We suggest adding:** area, number and quality of OECMs. **Why:** As commented above.
2	11-12	A	46	**We suggest:** "Effective management and equitable governance of ~~the system of~~ protected areas and OECMs" **Why:** It's important to note that not all Parties have PA systems. The target is based on measuring/monitoring effectiveness, so "effective" area-based conservation measures are cacophonous.
2	11	B	46	**We suggest**: Trends in management effectiveness **of protected areas and other area-based conservation measures, including IPLCs lands/territories voluntarily destined for conservation.** **Why:** If the indicator is going to be PADDD, special emphasis should be put in the part of "other area-based conservation measures" to ensure that IPLCs lands are included.
2	12	C	**Additional indicator suggested after row 47**	**We suggest:** Trends in representativeness of IPLC's nature-culture links to biodiversity in local, national and regional conservation policies, especially those fostered by women. **Why:** There is mutual feedback between cultural systems and the environment, as shift in one often leads to a change in the other. IPLC and especially women are the guardians of these values and responsible for passing them through generations.
2	2	B	48	**We suggest:** Trends in proportion of protected areas and other effective area-based conservation measures under ~~various~~ **different** governance

				regimes, including public, private, Indigenous Peoples and local communities and shared governance regimes. **Why:** Avaaz understands that at least the four types of governance should be explicitly noted in the monitoring element, both for protected and conserved areas, as well as for governance diversity, quality and vitality, as noted in the Sharm El-Sheikh Declaration on Nature and Culture (CBD/COP/14/INF/46).
2	12	C	48	**We suggest:** ~~Number~~ **Area** of certified forests ~~areas~~ under sustainable management with verified impacts on biodiversity conservation. **Why:** "Number" is not an impact indicator in this case.
2	12	C	**Additional indicator suggested after row 48**	**We suggest:** Area of ICCAs and/or IPLCs lands/territories voluntarily destined for conservation. **Why:** An additional indicator is needed for the "equitable governance" mentioned in Column A. Also to point out IPLCs rights as well as strategic participation for the corresponding component of the 2030 target T.2.4 "Effective management and equitable governance of the system of protected areas and other effective area-based conservation measures" (column A), as well as the corresponding monitoring element proposed in column B ("Trends in proportion of protected areas and other effective area based conservation measures under various governance regimes"). Scientific literature recognizes that governance shapes conservation outcomes, governance that improves protected areas (PA) outcomes also improves their legal durability. More information available here.
2	12	B	**Additional monitoring element suggested after row 48**	**We suggest:** Trends in land tenure security for IPLCs (T2.4). **Why:** As for SDG 1.4 By 2030 ensure that all men and women, particularly the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership, and control over land and other forms of property, inheritance, natural resources, appropriate new technology, and financial services including microfinance; and SDG Indicator 1.4.2. Proportion of total adult population with secure tenure rights to land, with legally recognized documentation and who perceive their rights to land as secure, by sex and by type of tenure.

22	1212	CC	**Additional indicator suggested after row 48Additional indicator suggested after row 48**	**We suggest adding:** Proportion of total adult IPLC population with secure tenure rights to land, (a) with legally recognized documentation, and (b) who perceive their rights to land as secure, by sex and type of tenure (SDGs indicator 1.4.2). **Why:** Different efforts in the UN System address this issue, including the Committee on World Food Security which, called to put implementation of the 2030 Agenda at the center of its work, explores legal and policy tools aiming to inject fairness and equity in tenure governance and sustainable development. The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), and FAO Technical Guide on Responsible Governance of Tenure and the Law, address legal approaches for operationalizing the VGGT, including securing legitimate land tenure rights as a step towards food security.We suggest adding: Indigenous Peoples Navigator (land, territories and resources indicators- under development) and International Land Coalition LANDEx, which we understand is under development. **Why:** The Indigenous Navigator is a framework and set of tools for and by indigenous peoples to systematically monitor the level of recognition and implementation of their rights. By using the Indigenous Navigator, indigenous organisations and communities, duty bearers, NGOs and journalists can access free tools and resources based on community-generated data.
2	12	C	**Additional indicator suggested after row 48**	**We suggest adding:** Indigenous Peoples Navigator (land, territories and resources indicators- under development) and International Land Coalition LANDEx, which we understand is under development. **Why:** The Indigenous Navigator is a framework and set of tools for and by indigenous peoples to systematically monitor the level of recognition and implementation of their rights. By using the Indigenous Navigator, indigenous organisations and communities, duty bearers, NGOs and journalists can access free tools and resources based on community-generated data.
2	11	C	**Additional indicator suggested after row 51**	**Methodological suggestion and observation**: Avaaz suggests to include four indicators on effectiveness for each governance regime recognized by the CBD.

2	12	C	52	**We suggest adding**: Trends in policies placed to improve equitable governance of Protected Areas. **Why**: The framework still lacks a clear definition of a protected area, so the question on the role of IPLCs remains open and unaddressed. Given the central role that IPLCs must play in the establishment of protected areas, it is important to explicitly monitor the state of equitable governance systems that fully respect their rights and where decisions are made based on free, prior and informed consent (FPIC). While Target 20 of this monitoring framework draft addresses this specific dimension, Avaaz believes it is important to explicitly include governance rights indicators in this specific area-based conservation target.
2	12	C	**Additional indicators suggested after row 52**	**We suggest adding:** Trends in the implementation of the voluntary guidance on integration of protected areas and other effective area-based conservation measures into the wider land-and seascapes and on mainstreaming these into sectors, as well as the voluntary guidance on governance and equity (Decision 14/8, annexes I and II, respectively by State. **Why:** See CBD Decision 14/8 on protected areas and OECMs and integration into landscapes/seascapes. Also: CBD decisions V/6 and VII/11.
2	**12**	**N/A**	**53-55 TARGET 3**	**A general comment on Target 3**: A target focused on species is a positive step; we encourage parties to recognize in this target the respect of the rights of IPLCs to collect and use wild species, and acknowledge the benefits of their uses, such as nutrition, livelihoods and the deep interrelation between the wellbeing, culture and food security of the IPLCs and their landscapes and seascapes. **For the purpose of reference, we suggest the following language:** By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%]**, while respecting rights to customary sustainable use.** **Additional comment:** Avaaz encourages the use of proxy indicators (regional level) in the reduction of human-wildlife conflict in lieu of the absence of global indicators.

2	12	B	**Additional monitoring element suggested after row 53**	**We suggest adding**: Trend in **in-situ** conservation measures/approaches. **Why**: In-situ measures are just as, if not more important for the recovery and conservation of wild species of fauna and flora than ex-situ measures. They enable evolutionary processes and adaptation to a changing world and climate, are more cost effective and overall more likely to succeed. Ex-situ measures should be reserved as a 'last resort'. Thus in addition to the monitoring element 'Trend in ex-situ conservation measures' we propose adding an additional monitoring element.conservation and sustainable use and utilization is mentioned throughout this document.
2	12	C	**Additional indicator suggested after row 54**	**We suggest adding:** Trends in species recovery programmes adopted and being implemented (under component T3.1). **Why:** Tracking progress enables reviewing and assessing actions.
2	**12-13**	**N/A**	**55-56** **TARGET 4**	**A general comment on Target 4:** while Avaaz welcomes this goal, it also notes that this framework needs more concrete indicators on sustainability in order to make it effective in its implementation phase. Furthermore, this monitoring framework will eventually need indicators related to enhanced participatory management and use, involving Indigenous Peoples and local communities, youth and women in order to ensure consistency with the SDGs. **For the purpose of reference, we suggest the following language:** By 2030, ensure that the harvesting, trade and use of wild species of fauna and **flora** is legal, at sustainable level ~~and safe~~**, while protecting and encouraging indigenous and local communities' customary sustainable practices in relation to biodiversity**. **Additional comment:** The word 'safe' in this target is misplaced and unclear, and can lead into different interpretations as to what is "safe", and "safe" from whom or what.Also: Article 10(c) of the CBD states that Parties shall protect and encourage indigenous and local communities' customary sustainable practices in relation to biodiversity. The GBF should consider Article 10 (c) provisions as a cross-cutting issue into its Goals and Targets, including and foremost regarding sustainable use of biodiversity.
2	13	B	**Additional monitoring element suggested after row 60**	**We suggest adding:** Number of known zoonotic spillover events linked to wildlife trade (under T4.1). **Why:** Given the health crisis and economic turmoil of Covid-19, is critical to track these events.

2	12	B	**Additional monitoring element suggested after row 56**	**We suggest adding:** Trends in customary use (under T.4.1). **Why:** Assessing the promotion, within the framework of the Convention, a just implementation of Article 10(c) at local, national, regional and international levels and to ensure the full and effective participation of indigenous and local communities at all stages and levels of implementation is key for the GBF.
2	12	C	**Additional indicator suggested after row 56**	**We suggest adding:** Trends could be monitored by IPLC and practices reported in LBO reports. **Why:** As commented before.
2	13	C	**Additional indicator suggested after row 56**	**We suggest adding:** Number of threatened species in the IUCN Red List, which list 'biological resource use' as a threat. **Why:** Threats from consumptive use of "wild" biological resources including both deliberate and unintentional harvesting effects; also persecution or control of specific species.
2	13	C	**Additional indicator suggested after row 56**	**We suggest adding:** number of countries with legislation under category 1 of CITES NPL. **Why:** National laws for implementing CITES are critical to ensure that trade in protected species is legal, sustainable and traceable. Legislation empowers government officials to act, regulates human behaviour and articulates policy in relation to conservation and trade in wildlife. Although CITES is legally binding on States it is generally not self-executing. This means that it cannot be fully implemented until specific domestic measures have been adopted for that purpose. It is therefore absolutely essential that CITES Parties have legislation in place allowing them to implement and enforce all aspects of the Convention. Only through adequate legislation, which is permanently up to date and efficiently enforced, both at the borders and within countries, can CITES really work. Adequate national legislation is key to effective wildlife trade controls by the State agencies charged with implementing and enforcing the Convention. It is also a vital prerequisite for ensuring that a State Party complies with the provisions of the Convention.

2	**14**	**N/A**	**67-80 TARGET 5**	**A General comment on Target 5:** While Avaaz welcomes the inclusion of a target on invasive alien species (IAS), it notes with concern that this specific target uses the language "where possible", which makes this target weak. **For the purpose of reference, we suggest the following language:** By 2030, manage~~, and where possible control,~~ pathways for the introduction of IAS, achieving 50% reduction in the rate of new introductions, and eradicate, control and manage IAS to eliminate or reduce their impacts, including in at least 50% of priority biodiversity sites. **Additional comment:** Given the nature of this target, Avaaz encourages the use of proxy indicators (regional level) in the reduction of human-wildlife conflict in lieu of the absence of global indicators.
2	14	C	**Additional indicator suggested after row 72**	**We suggest adding:** Proportion of key biodiversity areas threatened by invasive alien species" (under T5.2). **Why: indicator proposed by BIP** which is being monitored by the KBA Partnership using data from the World Database of KBAs.
2	14	C	**Additional indicator suggested after row 72**	**We suggest adding:** Trends in monitoring priority invasive alien species (Under T5.2). **Why:** Data sourcing can be done via national reports.

2	**15**	**N/A**	**81-96** **TARGET 6**	**A General comment on Target 6:** the current articulation of this target is less ambitious than its predecessor; therefore Avaaz suggests to put back the target of 50% reduction for 2030, taking a baseline from 2020. Plastic pollution is a serious threat to our biodiversity and an ambitious target should be set as a matter of urgency. New research suggests the scale of plastic pollution in our oceans could be a million times worse than previously recorded and the UN has called businesses and governments to take ambitious action and move beyond recycling and the elimination of the most problematic packaging. **For the purpose of reference, we suggest the following language:** By 2030, **significantly** reduce pollution from all sources, including reducing excess nutrients ~~[by x%]~~, biocides ~~[by x%]~~, **and** plastic waste by ~~x%~~**50%** to levels that are not harmful to biodiversity and ecosystem functions and human health**, from 2020 baselines, prioritizing pollutants that have an impact on vulnerable groups, such as women, children, and indigenous peoples and local communities**. **Additional comment:** Avaaz suggests in the monitoring elements to clearly split each trend into two categories, land and sea, because the nature and dynamics of pollution are quite different and cannot be encapsulated in one monitoring element (e.g. trends in levels of pollution from noise, hazardous waste, sediments, biocides, etc). Additional indicators should be created through a government-led cross-sectorial transparency mechanism in order to measure progress in the reduction of nutrient pollution, sediment, plastic and chemical pollution of the ocean by industry, agriculture, waste management and sewage, as well as marine noise pollution. Furthermore, parties should consider a globally standardized monitoring element and indicators for the reduction of material waste generated (based on measures from "zero waste" programs), reduction of sales of disposable materials and a rapid uptake of recycling; including metals, minerals and non-metals. Last but not least, reduction policies should prioritize those pollutants that affect vulnerable groups.
2	15	B	81	**Methodological suggestion and observation**: As a matter of observation, this indicator mixes together impacts from two completely different pollutants; nitrogen and plastic, "plastic debris density (SDG indicator 14.1.1)" should be removed from this section and placed in rows 89 or 90, which deal with pollution from plastic.
2	15	C	86	**We suggest:** Amount of chemical pesticides and fertilizers used. **Why:** can be done via FAO and IFA statistics.

2	15	C	**Additional indicators suggested after row 86**	**We suggest adding:** Trends in decoupling economic growth from environmental and resource degradation. **Why:** Decoupling economic growth from environmental and resource degradation, and creating a circular economy through reuse, recycling, and remanufacturing are key strategies for reducing both GHG emissions and other environmental and resource pressures. Data can be consulted in the International Resource Panel (IRP), a global scientific panel hosted by the United Nations Environment Programme.
2	15	C	**Additional indicators suggested after row 86**	**We suggest adding:** Trends in products life cycle assessments. **Why:** Life-Cycle Assessment (LCA) is a touchstone feature of the 10YFP. This project was advanced under the International Forum on LCA Cooperation and is part of the One Planet Network Consumer Information Programme**.**
2	15	C	**Additional indicators suggested after row 86**	**We suggest adding:** Number of countries developing, adopting or implementing policy instruments aimed at supporting the shift to sustainable consumption and production. **Why:** As per direction of SDG 12.
2	16	C	89	**Methodological suggestion and observation**: Avaaz notes that the SDG indicator 14.1.1 is not yet developed, and data is expected to be available from 2020, aligning with a SDG target related to reducing marine pollution. Avaaz suggests to split in two the indicators outlined in the same row, keeping with the same language "(a) Index of coastal eutrophication" in row 89; and "(b) plastic debris density (SDG Indicator 14.1.1)" in the following row.
2	16	B	**Additional monitoring element suggested after row 90**	**We suggest adding**: Trends in persistent organic pollutants. **Why**: POPs are polluters of high impact on biodiversity and this impact is global given transboundary movement, with bioaccumulation and direct consequences for species health (and human public health). The Conventions of Basel, Stockholm, Rotterdam and others should inform the GBF on concrete indicators in this regard.
2	16	B	**Additional monitoring element suggested after row 90**	**We suggest adding**: Trends in microplastics present in land, freshwater and marine ecosystems. **Why**: The highly harmful impact of microplastics should be monitored in order to address its drastic reduction for the next decade. UNESCO has conducted several pieces of research on this issue.
2	16	C	**Additional indicators suggested after row 91**	**We suggest adding:** Percentage of wastewater facilities complying with standards. **Why:** see page 75 of UNEP report (more information here).

2	16	C	**Additional indicators suggested after row 91**	**We suggest adding:** Percentage of untreated wastewater. **Why:** see page 75 of UNEP report (more information here).
2	16	C	93	**We suggest including:** Proportion of countries and competent institutions applying mitigation and management measures to prevent or minimise anthropogenic underwater noise (component under T.6.4). **Why:** See Convention on Conservation of Migratory Species of Wild Animals (CMS) Resolution 12.14 (2017).
2	16	C	93	**We suggest including:** CBD Technical report on impacts of anthropogenic underwater noise on marine and coastal biodiversity (which will be issued as an information document for SBSTTA-24) **Why:** See Convention on Conservation of Migratory Species of Wild Animals (CMS) Resolution 12.14 (2017).
2	16	C	93	**We suggest including:** Convention on Conservation of Migratory Species of Wild Animals (CMS) Family Guidelines on Environmental Impact Assessments for Marine Noise-generating Activities and the Technical Support Information to these guidelines. **Why:** See Convention on Conservation of Migratory Species of Wild Animals (CMS) Resolution 12.14 (2017).
2	**16-18**	**N/A**	**97-116 TARGET 7**	**A general comment on Target 7:** Avaaz is deeply concerned about the ambiguity and lack of ambition of this target. While it's a good step to keep at target level climate change mitigation, adaptation and disaster risk reduction, the lack of precision makes this target meaningless. Avaaz also notes that there's no longer mention of the Paris agreement. Achieving the Paris Climate Agreement Goals (Teske et al, 2019) demonstrates the 30% reduction target outlined in the Draft Zero is the right one and should be put back in order to add key indicators through ecosystems-based approaches and nature based solutions: 2.5GtCO2/yr negative emissions is possible in 2030 with another 4GtCO2 in avoided land use, land-use change, and forestry (LULUCF) emissions (or 6.5GtCO2 which is about 34% of the the 19GtCO2 reduction needed by 2030). By 2050 we can be doing 7.3 GtCO2/yr + 4GtCO2 and we need a total reduction of 38GtCO2 (around 30%). **For the purpose of reference, we suggest the following language:** By 2030, increase contributions to climate change mitigation, adaptation and disaster risk reduction from **culture** ~~nature~~-based solutions and ecosystem-based approaches, ensuring resilience and ~~minimising~~ **averting** any negative impacts on biodiversity**, by providing approximately 6.5GtCO2 per year of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity, food sovereignty and IPLCs rights, as well as an increase in the securely titled and appropriately supported**

				Indigenous and/or community managed and owned territories, especially in areas of particular importance for ecosystem services, including carbon storage, water provisioning, sustainable livelihoods and climate resilience. **Additional comment:** The upcoming Global Safety Net (GSN) helps us to see the linkages between the Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD). If we surpass 1.5°C in global average temperature rise, it will be difficult if not impossible to achieve the goals of the CBD. And if we fail to protect or conserve lands for ecosystem services and carbon sequestration, we will not be able to achieve the Paris Climate Agreement. There is a very finite amount of natural land (1.5% of global land area) that could be converted to human uses before we lose the 1.5°C window. Therefore, we need to protect all remaining natural lands by 2030 – approximately 50% of the Earth – in order to save biodiversity and stabilize our global climate system. As many grassroots partner organizations pointed out, including secured tenure as a specific action target appropriately recognises the solutions and positive contributions of Indigenous Peoples and local communities, instead of relegating them to participation and safeguards. There's also a need for recognition that an increase in the securely titled and appropriately supported Indigenous and/or community managed and owned territories would directly contribute to the desired outcomes of both the UNFCCC and the CBD, in particular by safeguarding carbon sinks. It's important to remind the Parties that IPLCS manage at least 22% (218 gigatons) of the total carbon found in tropical and subtropical forests (including both above- and belowground sources) and that at least a third of this carbon —and likely much more— is in areas where IPLCs lack formal recognition of their land rights. Failure to legally recognize their rights leaves our forests vulnerable to environmentally destructive projects that devastate forests and release massive amounts of carbon into the atmosphere. Legally recognizing their land rights and supporting their initiatives is vital to the success of global efforts to mitigate climate change and the loss of biodiversity.
2	16	C	97	**We suggest:** Indicator on above ground biomass stock in forests. **Why:** See Global Core Set of Forest Indicators (UNFF).
2	16	C	97	**We suggest adding:** The following proxy indicators: Ecosystem Health Index (EHI), Ecosystem Intactness Index (EII), Living Planet Index (LPI), Forest Landscape Integrity Index (FLII) and under the element Trends in carbon stocks in different ecosystems. **Why**: Data from these indexes could provide critical information to track tropical ecosystems (carbon stocks).

2	16	C	98	**We suggest adding**: Proportion in the protection of healthy ecosystems considered for the implementation of adaptation plans. **Why**: Healthy ecosystems have proven to be relevant to mitigate the impacts of extreme hydrometeorological phenomena derived from climate change.
2	**18-20**	**N/A**	**103-116 TARGET 8**	**A general comment on Target 8:** Avaaz is concerned about the lack of language on equity and as well the lack of focus on this target. Avaaz suggests for the indicators for this target a greater focus on the benefits for people and put elements of equity in order to allow this target to have consistent and meaningful indicators to track progress. **For the purpose of reference, we suggest the following language:** By 2030, ensure benefits, including nutrition, food security, livelihoods, health and wellbeing, for people, especially for the most vulnerable through **culturally and socially** sustainable management of wild species of fauna and flora**, including customary and traditional sustainable use by IPLCs**. **Additional comment:** This target, outlined under the umbrella "Meeting People's Needs Through Sustainable Use and Benefit-sharing", does not include any actions related to meeting the needs of Indigneous Peoples and local communities to the resources that they depend on, and manage. This appears as an absence in the text 'People's needs' are defined exclusive to the needs of local communities and Indigenous Peoples. And the question remains on how and who receives the benefits.
2	18	C	103	**Methodological suggestion and observation**: Avaaz wishes to note that other indicators should be created, since a growing voice in the scientific community is warning that this SDG indicator is not ambitious enough in order to restore fish stocks, in terms of the relationship between percentage (50%) and timeframe.
2	18	C	**Additional indicator suggested after row 109**	**We suggest:** National trends in the implementation of ecosystem approach to fisheries. **Why:** See FAO, The Ecosystem Approach to Fisheries, Technical Guidelines for Responsible Fisheries, No. 4 Suppl.2, 2003). This would be consistent with Aichi Target 6 and the efforts by FAO to align their Code of Conduct reporting mechanisms with Aichi Target 6.
2	18	C	**Additional indicator suggested after row 109**	**We suggest:** Trends in threatened species and vulnerable ecosystems recovery as a result of applied conservation and management measures. **Why:** As presented in the IUCN Green Lists on species recovery and conservation, and on Protected and Conserved Areas.
2	18	C	**Additional indicator**	**We suggest:** Trends and status of ecosystem structure and function

			suggested after row 109	**Why:** see Garcia, S.M. and Rice, J. Assessing Progress towards Aichi Biodiversity Target 6 on Sustainable Marine Fisheries. Technical Series No. 87. Secretariat of the Convention on Biological Diversity, Montreal, 103 pages.
2	18	C	**Additional indicator suggested after row 109**	**We suggest:** Degree of implementation by States to eliminate or minimise bycatch, require impact assessments, impose rebuilding plans with the shortest possible time frames, protect habitats, eliminate destructive fishing practices, prioritise small scale fishing that supports livelihoods of indigenous peoples and local communities over industrial fishing in the territorial seas. **Why:** as per UNFSA, Art. 5(d) and relevant CBD decisions.
2	17-19	B	**Additional monitoring element suggested after row 116**	**We suggest:** Trends in use of customary practices to manage aquatic and terrestrial wild species. **Why:** ICCAs and LMMMAs to ensure that benefits from sustainable use are accruing especially for the most vulnerable
2	17-19	C	**Additional indicator suggested after row 116**	**We suggest:** Quality and vitality of customary practices (ICCAs, LMMAs) used to manage aquatic and terrestrial wild species. **Why:** LBO (produced every 4 years) is a source of this data, plus documentation that might be in local registries and the ICCAs registry.
2	19	B	**Additional monitoring element suggested after row 110**	**We suggest adding:** Number of known zoonotic spillover events linked to wildlife trade. **Why:** it is needed to ensure wildlife trade to be 'safe for human health', which is critical in the current context of human tragedy and economic devastation posed by Covid-19.
2	19	B	114	**We suggest**: Trends in terrestrial wild species of fauna **and flora** used for food and medicine **Why**: Addition suggested to ensure consistency with Column A mentioning flora as well as fauna. Also, indicators proposed in Column C include flora.
2	19	C	114	**We suggest eliminating**: ~~Number of plant and animal genetic resources for food and agriculture secured in medium or long-term conservation facilities (SDG indicator 2.5.1)~~ **Why**: We suggest to eliminate this indicator considering that sustainable management of terrestrial wild species of fauna and flora (as Column A calls), and for monitoring trends in terrestrial wild species of fauna used for food and medicine (Column B), have nothing to do with keeping seeds and other genetic resources in facilities.

2	19	C	**Additional indicator suggested after row 114**	**We suggest adding:** Trends in the diversity of plant and animal species/genetic resources [of wild relatives and non-commercial varieties] conserved *in situ* by diverse farming methods, including traditional agricultural practices. **Why**: As commented before, and considering the relevant role that sustainable management of terrestrial wild species of fauna and flora, as well as terrestrial wild species of fauna and flora used for food and medicine, play in conserving the diversity of plant and animal genetic resources for food and agriculture *in situ* conservation by diverse farming methods, especially traditional farming methods, including FAO's "Globally Important Agricultural Heritage Systems" (GIAHS) inclusion in the GBF is essential. More information here.
2	**20**	**N/A**	**117-126 TARGET 9**	**A general comment on Target 9:** Avaaz welcomes this target, and suggests to add an explicit inclusion of the IPLCs contribution in this target. **We suggest the following language:** By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation**, the contributions of IPLCs to agroecology and food sovereignty** and **other** sustainable use of such ecosystems, reducing productivity gaps by at least 50%. **Additional comment:** We're already producing more than enough food to feed 10 billion people, but roughly 1/2 of the world's agricultural land is currently used to grow livestock feed and fuel crops. In addition, roughly 30% of produce yields are wasted. So we're only able to feed 7 billion people, leaving 1/10th of the population in hunger. If half of the areas used for food and fuel were put into food production instead, we could feed another 2.5 billion people. Sustainable soil use, along with complementary measures such as cutting food waste by half, will be critical for the success of the GBF and the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity. The target of reducing productivity gaps by at least 50% can only be achieved with the leadership of Indigenous Peoples, local communities and small farmers. For more guidance and information, Avaaz encourages parties to read our review comments on the SBSTTA-24 Updated Plan of Action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity.
2	20	C	117	**We suggest adding**: Proportion of land degraded over total land area. **Why:** SDG 15.3.1 and UNCCD "Trends.Earth" monitors changes in primary productivity, land cover and soil organic carbon.
2	20	C	**Additional indicator suggested after row 117**	**We suggest:** Number of hectares under agro-ecological practices. **Why:** As commented before.

2	20	C	**Additional indicator suggested after row 117**	**We suggest:** Number of hectares under agro-biodiversity index. **Why:** As commented before.
2	20	C	118	**We suggest**: Proportion of agricultural area under ~~productive~~ **intensive** and sustainable agriculture (SDG indicator 2.4.1). **Why:** This input is considered for "Trends in area of agriculture under sustainable practices". Sustainable agriculture is productive. What we understand for this target is the monitoring of how sustainable agriculture is "gaining terrain" over intensive agriculture, not over productive agriculture. We acknowledge that this is the wording used for SDG indicator 2.4.1, but for the GBF it would be better to know/monitor how sustainable agriculture is doing over intensive agriculture. It's important to note that it's not the mandate of the CBD to increase food production, but to ensure that it's done sustainably.
2	20	C	**Additional indicator suggested after row 118**	**We suggest adding:** Proportion of land under organic and/or agroecological practices. **Why:** As commented before.
2	20	C	**Additional indicator suggested after row 118**	**We suggest adding**: Area of traditional farming methods where plant and animal genetic resources for food and agriculture are conserved *in situ* (including "Globally Important Agricultural Heritage Systems" - GIAHS). More information here. **Why:** As commented before.
2	20	C	119	**We suggest:** Areas **under** ~~**of agricultural land under conservation agriculture**~~ **agro-ecological agro-forestry and other sustainable approaches.** **Why**: This indicator should be broader than just conservation agriculture and encompass all proven sustainable agriculture approaches and practices.

2	20	B	**Additional monitoring element suggested after row 119**	**We suggest adding:** Trends in area covered by agricultural and other related practices implemented by IPLCs and smallholder farmers. **Why**: The United Nations estimates that smallholder farmers provide 80% of the nutrition in the global south, and many of these farmers rely upon traditional, agroecological practices, increasing seed diversity, decreasing chemical inputs, and regenerating fertile land through composting and cover cropping that conserves and protects soil biodiversity, and increases carbon, water, and nutrient retention in the soil. Creating an additional monitoring element on smallholders could also provide additional information and indicators on, for example, the increase of nutrition, diet variability and food security. (See our review comments on the SBSTTA-24 Updated Plan of Action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity).
2	20	C	**Additional indicator suggested after row 119**	**We suggest adding:** Trends in agriculture biodiversity maintained by IPLC conservation actions, including seed conservation measures. **Why**: As commented before.
2	20	C	**Additional indicator suggested after row 119**	**We suggest:** Trends in chemical pesticides and fertilizers used per area **Why:** FAO and IFA statistics
2	20	C	120	**We suggest adding**: Trends in soil organic carbon stocks (SDG indicator 15.3.1). **Why**: As in the indicator document prepared by UNEP-WCMC (SDG indicator 15.3.1 and FAO GSOC), data available every four years, latest data between 2000-2015. See more information here.
2	20	C	120	**We suggest:** Area of agricultural soils conserved and restored. **Why:** Restoring and conserving soils prevents opening new lands for agriculture.
2	20	C	122	**We suggest eliminating:** ~~Number of plant and animal genetic resources for food and agriculture secured in medium or long term conservation facilities (SDG indicator 2.5.1)~~ **Why:** We suggest eliminating this indicator considering that Sustainable management of terrestrial wild species of fauna and flora (as Column A calls), and for monitoring trends in genetic diversity of cultivated plants and of wild relatives (Column B), have little to do with keeping seeds and other genetic resources in facilities. Genetic diversity is in constant change in *in situ* conditions.

2	20	C	**Additional indicator suggested after row 122**	**We suggest adding:** Trends in *in situ* conservation of plant and animal species/genetic resources [of wild species and less commercial species] for food and agriculture. **Why**: Please refer to the comment on row 122.
2	20	A	125	**We suggest**: T9.3. Sustainable management of all types of **productive** forests. **Why**: It should be explicitly noted in this component that the monitoring framework is referring to forests that are subject to sustainable extraction, forestry or other forms of management, not to forests under the regimes of IPLCs, PAs and other forms of conservation.
2	20	B	**Additional monitoring element suggested after row 125**	**We suggest:** Trends in area of native forests under sustainable practices. **Why**: This monitoring framework should clearly differentiate between native forests and monoculture forest plantations, and it should measure in detail the state of forest mass that is relevant for biodiversity and sustainable management. Furthermore, in order to keep consistency, monoculture tree plantations should not be accounted for under the T9.3 component. Indicators should focus only on forest ecosystems (primary forests and planted, restored or regenerated forests with native species), excluding introduced species, as outlined in FAO's Global Forest Assessment 2015 (see FRA 2015).
2	20	C	**Additional indicator suggested after row 125**	**We suggest:** Trends in sustainable native forest ecosystems management. **Why:** As commented before.
2	21	C	**Additional indicator suggested after row 126**	**We suggest:** Existence of traceability system(s) for wood products **Why:** As above.
2	21	C	**Additional indicator suggested after row 126**	**We suggest:** Employment related to the forest sector. **Why:** As commented above.

2	**21**	**N/A**	**127-131 TARGET 10**	**A general comment on target 10**: Most disasters are human induced, which this goal should reflect. Furthermore, Avaaz proposes to add the word "natural" to the text to ensure that the focus is more clearly on enhancing nature's ability to provide air quality and water in quality and quantity. And on water access Avaaz suggests to follow language of the SDG 6.1. **For the purpose of reference, we suggest the following language:** By 2030, ensure that nature based solutions and ecosystem approach contribute to **natural** regulation of air quality, hazards and **human-induced** extreme events and **the universal and equitable access to water, including safe and affordable water for all, in** quality and quantity ~~of water for at least [XXX million] people~~. **Additional comment:** Recommendation SBSTTA 23/2 notes that nature-based solutions with biodiversity safeguards are an essential component of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction. As mentioned before, the upcoming Global Safety Net (GSN) helps us to see the linkages between the Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD). If we surpass 1.5°C in global average temperature rise, it will be difficult if not impossible to achieve the goals of the CBD. And if we fail to protect or conserve lands for ecosystem services and carbon sequestration, we will not be able to achieve the Paris Climate Agreement. There is a very finite amount of natural land (1.5% of global land area) that could be converted to human uses before we lose the 1.5°C window. Therefore, we need to preserve all remaining natural lands by 2030 – approximately 50% of the Earth – in order to save biodiversity and stabilize our global climate system.
2	21	C	127	**We suggest adding:** Indicator SDG 11.6.1 (Proportion of urban solid waste regularly collected and with adequate final discharge out of total urban solid waste generated, by cities). **Why**: As per the comment on target 10.
2	21	C	127	**We suggest adding:** Indicator SDG 11.6.2, annual mean levels of fine particulate matter (e.g. PM2.5 and PM10) in cities (population weighted). **Why**: As per the comment on target 10.

2	21	C	127	**We suggest adding** as proxy indicators the following ones: (b) Living Planet Index (LPI) (e) Ecosystem Intactness Index (EII) (f) Biodiversity Intactness Index (BII) (g) Biodiversity Habitat Index (BHI) (h) Ecosystem Health Index (EHI) **Why:** Data from these five indexes will provide necessary information to provide proxy data that would be useful in monitoring specific progress on air quality.
2	21	C	**Additional indicator suggested after row 131**	**We suggest adding:** Proportion of population using safely managed drinking water services SDG 6.1.1). **Why:** As per the comment on target 10.
2	21	C	**Additional indicator suggested after row 131**	**We suggest adding:** Change in water-use efficiency over time (SDG 6.4.1). **Why:** As per the comment on target 10.
2	21	C	**Additional indicator suggested after row 131**	**We suggest adding:** Level of water stress: freshwater withdrawal as a proportion of available freshwater resources (SDG 6.4.2). **Why:** As per the comment on target 10.
2	21	C	**Additional indicator suggested after row 131**	**We suggest adding:** Standards for water efficiency in place at national level. **Why**: As per the comment on target 10.

2	21	C	**Additional indicator suggested after row 131**	**We suggest adding:** as an indicator the WHO/UNICEF Joint Monitoring Programme. **Why**: The WHO/UNICEF Joint Monitoring Programme for Water Supply, Sanitation and Hygiene (JMP) has reported country, regional and global estimates of progress on drinking water, sanitation and hygiene (WASH) since 1990. The JMP maintains an extensive global database and has become the leading source of comparable estimates of progress at national, regional and global levels. The 2015 update marked the end of the Millennium Development Goal period and the 2017 update established baseline estimates for monitoring the new Sustainable Development Goal targets. The JMP has developed a new 5-year strategy (2016-2020) focused on further enhancing global monitoring of drinking water, sanitation and hygiene in the context of the new 2030 Agenda for Sustainable Development. The JMP has updated its vision and mission statements in line with the 2030 Agenda, and rebranded itself as the WHO/UNICEF Joint Programme for Water Supply, Sanitation and Hygiene. The JMP strategy comprises four main objectives which include consolidating its normative function and its role as a global custodian of WASH data, further strengthening country support, and promoting a more integrated approach to monitoring WASH and related issues in collaboration with other agencies (more information click here).
2	21-22	B	**Additional monitoring element suggested after row 132**	**We suggest:** Trends in biodiversity conservation in urban areas (T.11.1) **Why:** This is related to SDG 11
2	21-22	C	**Additional indicator suggested after row 132**	**We suggest:**Trends in urban green space management plans in place. **Why:** Related to SDG 11
2	**21**	**N/A**	**132-139** **TARGET 11**	**A general comment on Target 11**: Avaaz welcomes this target and suggests taking into account specific cultural considerations, so local cultures are respected and prioritized over the access of which urban dwellers in certain spaces. **For the purpose of reference, we suggest the following language:** By 2030, increase benefits from biodiversity and green/blue spaces for human health and well-being, including the proportion of people with **full and free** access to such spaces by at least [100%], especially for urban dwellers, **while ensuring the respect of local cultures and impact control in recreational and other uses.** **Additional comment**: This target can be largely aligned with SDG 11. However, we also caution that "well being" and "human health" are multidimensional concepts that require a multidisciplinary process to define, design, develop, articulate and measure indicators for "well being" in the context of biodiversity.

2	21	C	**Additional indicator suggested after row 132**	**We suggest adding**: Proportion of green/blue spaces with fully free and unrestricted access. **Why:** Green and blue spaces should be accessible for all people, ensuring full and free access.
2	21	C	**Additional indicator suggested after row 132**	**We suggest adding:** Average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities (SDG 11.7.1). **Why:** This indicator measures the amount of open public areas in cities. Cities that improve and sustain public spaces enhance community cohesion, civic identity, and quality of life. UNHabitat manages this SDG indicator.
2	22	B	**Additional monitoring element suggested after row 133**	**We suggest adding**: Trends in loss and recovery of species that provide essential services for human health, health security and well-being. **Why**: Species, and not only ecosystems provide benefits for human health and well-being.
2	22	C	**Additional monitoring element suggested after row 133**	**We suggest adding**: Trends in species conservation and sustainable use for health security and wellbeing, especially for IPLC. **Why**: As commented above.
2	22	C	**Additional indicator suggested after row 134**	**We suggest:** Number of forest-dependent people in extreme poverty. **Why:** As defined under the Global Core Set of Forest Indicators (UNFF).
2	22	C	**Additional indicator suggested after row 134**	**We suggest:** Contribution of forests to food security. **Why:** As commented above.
2	22	B	**Additional monitoring element suggested after row 139**	**We suggest adding:** Trends in contribution to human health and well-being from mountain ecosystems. **Why**: Around 30% of tourists go to mountain areas, and there's an increasing recognition of the key role of mountain ecosystems in public health and cultural diversity.
2	22	B	**Additional monitoring element suggested after row 139**	**We suggest adding:** Trends in the impact of ecosystem disturbances to human health and nutritional security, especially regarding impacts on vulnerable groups and IPLC. **Why**: As commented above.

2	**22**	**N/A**	**140-151 TARGET 12**	**A general comment on Target 12**: Avaaz believes knowledge and right holders should be mentioned in this target. **For the purpose of reference, we suggest the following language:** By 2030, increase by [X] benefits shared for the conservation and sustainable use of biodiversity through ensuring access to and fair and equitable sharing of benefits arising from utilization of genetic **and biological** resources **in any form**, **ecosystem services** and associated traditional knowledge, **based on the free, prior and informed consent (FPIC) of rights-holders and knowledge-holders, and considering synergies with other global instruments on benefit sharing.** **Additional comment:** We recommend that this 'benefit-sharing' goal is widened to include the sharing of benefits from the conservation of biodiversity, use of ecosystem services and other activities, building from the spirit of the Nagoya Protocol on Access and Benefit Sharing to the CBD,
2	24	A	146	**We suggest the amendment:** T12.2. Benefit shared from the ~~use~~ **utilization** of genetic resources. **Why:** This suggested amendment is to be in accordance with the CBD text and the Nagoya Protocol text.
2	24	C	150	**We suggest:** number of countries with policy framework for appropriate recognition and protection of traditional knowledge systems (under T.12.3) **Why:** As commented on Target 12.
2	24	B	150	**We suggest the amendment:** Trends in ~~use of~~ **access to** traditional knowledge associated with genetic resources. **Why:** This amendment marks the relevance of traditional knowledge (TK) associated with genetic resources, while the term "use" may lead to the interpretation that somehow TK could be disassociated from genetic resources and ABS agreements.
2	24	C	150	**We suggest adding:** Number of countries that require prior informed consent that have published information on ABS that included access to traditional knowledge associated with genetic resources, procedures in the ABS Clearing-House. **Why**: Regarding access to traditional knowledge associated with genetic resources, CBD Nagoya Protocol aims at ensuring that traditional knowledge associated with genetic resources that is held by IPLC is accessed with the prior and informed consent or approval and involvement of these indigenous and local communities, and that mutually agreed terms have been established.

2	24-25	A	150-151	**We suggest the amendment**: T12.3. Benefits resulting from ~~use~~ **access to** traditional knowledge associated with genetic resources. **Why:** This amendment marks the relevance of traditional knowledge (TK) associated with genetic resources, while the term "use" may lead to the interpretation that somehow TK could be disassociated from genetic resources and ABS agreements.
2	25	B	151	**We suggest:** Trends in benefits generated and shared from **access to** traditional knowledge associated with genetic resources. **Why:** This amendment marks the relevance of traditional knowledge (TK) associated with genetic resources, while the term "use" may lead to the interpretation that somehow TK could be disassociated from genetic resources and ABS agreements.
2	25	C	151	**We suggest adding:** Nature of the shared benefits shared from access to traditional knowledge associated with genetic resources. **Why**: As commented before.
2	**25**	**N/A**	**152-161 TARGET 13**	**A general comment on Target 13:** Avaaz believes that a wide and truly inclusive participatory process is the fundamental basis for any mainstreaming effort, hence our wording proposal in that regard. **For the purpose of reference, we suggest the following language:** By 2030, **integrate** biodiversity **and cultural** values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are **mainstreamed** across all sectors and integrated into **inclusive and participatory** assessments of **cultural**, environmental **and social** impacts. **Additional comment:** Inclusive participation is key. This framework should be a strong cultural change factor among policy makers, so language is critical to start that process with all sectors, especially in areas of the governments that are less familiar with the GBF and biodiversity-related instruments and mechanisms.

2	25	C	**152**	**We suggest:** ~~**a) Number of countries that have**~~**Trends in** 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 – a), inclusive and participatory** assessments of **cultural**, environmental **and social** impacts).~~. and (b) integration of biodiversity into national accounting and reporting systems, defined as implementation of the System of Environmental-Economic Accounting (SDG indicator 15.9.1).~~ **Why**: As commented on Target 13; also: see SDG indicator 15.9.1.
2	25	C	**Additional indicator suggested after row 152**	**We suggest**: Trends in the 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). **Why:** We believe that splitting this indicator in two (from the original articulation) will provide more focus in the measurement of impact.
2	25	C	**Additional indicator suggested after row 152**	**We suggest adding:** Trends in the promotion of the full and effective participation of relevant sectors, IPLCs, academia, women, youth and other relevant stakeholders for the reviewing and, as appropriate, updating of legal frameworks, policies and practices to promote the mainstreaming of biological diversity in the agriculture, forestry, fishery, tourism, energy and mining, infrastructure and manufacturing and processing sectors. **Why**: In accordance with decisions on CBD COPs 13 and 14 on mainstreaming biodiversity in productive sectors.
2	25	C	154	**We suggest adding**: Number of countries with established biodiversity proofing mechanisms. **Why**: Mainstreaming biodiversity into development considerations is a big, and yet necessary cultural change among key decision makers in development processes and legislation.
2	26	C	155	**We suggest adding:** Proportion of total adult population with secure tenure rights to land with legally recognized documentation, and who perceive their rights to land as secure, by sex and type of tenure (as indicated at SDG Indicator 1.4.2), under T.13.1. **Why:** Tenure security is recognized as a necessary factor in enabling sustainable natural resource management and eradicating poverty. It is an indicator under SDG1.

2	26	B	**Monitoring element suggested below row 156**	**We suggest:** Trends in assessment and mitigation of environmental risks by central banks and other financial institutions. **Why:** as outlined in CBD/SBI/3/5/Add.3, para 23.
2	26	C	**Additional indicator suggested below row 156**	**We suggest:** Number of countries with disclosure requirements in the financial sector to account for dependencies, impacts and risks associated with biodiversity loss. **Why:** as outlined in CBD/SBI/3/5/Add.3, para 23.
2	26	C	**Additional indicator suggested below row 156**	**We suggest:** Number of countries with taxonomies to navigate the transition to a low-carbon, resilient and resource-efficient economy that preserves and enhances biodiversity. **Why:** See above.
2	26	C	**Additional indicator suggested below row 156**	**We suggest:** Number of countries with Central Banks and regulators assessing risks and mitigating them associated with biodiversity loss. **Why:** See above.
2	27	A	**Additional component suggested after row 161**	**We suggest:** An additional target component T13.4: Comprehensive stakeholder engagement in the implementation of the GBF. **Why:** Multi-stakeholder engagement will be key for this process. Data sourcing can be done via national stakeholder reports.
2	27	B	**Additional monitoring element suggested after row 161**	**We suggest:** Trends in quantity and quality of multistakeholder and multisectoral platforms and processes for the implementation and monitoring of the GBF. **Why**: As commented above.
2	27	C	**Additional indicator suggested after row 161**	**We suggest:** Number and quality of multi-stakeholder and multisectoral platforms and processes on biodiversity at national and regional level set up and strengthened **Why**: As commented above.

2	**27**	**N/A**	**162-179** **TARGET 14**	**A general comment on Target 14:** with the current technology available, and the fast technology advances in the near future, it's possible to reduce to zero the negative impacts on biodiversity in production practices and supply chains. **For the purpose of reference, we suggest the following language:** By 2030, achieve [~~50%~~] **100%** reduction in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable, **through, especially, regulatory approaches and effective enforcement, both nationally and at translational level.** **Additional comment:** Parties have identified the need to address the fact that distant areas of the world are increasingly connected by trade and global supply chains, resulting in biodiversity loss in other areas. Setting up a specific target on trade related impacts is important in this context.
2	27	C	**Additional indicator suggested after row 164**	**We suggest:** Trends in circular economy initiatives in place **Why:** Circular Economy is one of the major policy tools that have been employed to reduce waste, conserve natural resources and protect biodiversity and ecosystem services.
2	27-28	A	**Additional component suggested after row 166**	**We suggest: T.14.1 (bis)** Food production/consumption **Why**: Food loss and waste is addressed by the International Resource Panel, the 10YFP and WRI.
2	27-28	B	**Additional monitoring element suggested after row 166**	**We suggest:** Trends in food waste and loss **Why:** See SDG 12 indicator 12.3.1 (Global Food Loss and Waste). SDG target 12.3 has two components, Losses and Waste that should be measured by two separate indicators: (a) Sub-Indicator 12.3.1.a [Food Loss Index: The Food Loss Index (FLI) focuses on food losses that occur from production up to (and not including) the retail level. It measures the changes in percentage losses for a basket of 10 main commodities by country in comparison with a base period. The FLI will contribute to measure progress towards SDG Target 12.3.] (b) Sub-Indicator 12.3.1.b: Food Waste Index [A proposal for measuring Food Waste, which comprises the retail and consumption levels is under development. The UN Environment is taking the lead on this sub-indicator].
2	27-28	B	**Additional monitoring element suggested after row 166**	**We suggest:** Trends in the global footprint of diets and food production and consumption. **Why:** As commented above.

2	27-28	C	**Additional indicator suggested after row 166**	**We suggest:** Global Food Loss and Waste Indexes. **Why:** As commented above.
2	27-28	C	**Additional indicator suggested after row 166**	**We suggest:** Trends in the adoption of sustainable and healthy diets guidelines **Why:** via national reporting
2	27-28	C	**Additional indicator suggested after row 166**	**We suggest:** Global volume of animal feed per capita. **Why:** sourcing data can be done via FAO statistics.
2	27	C	173	**We suggest**: Number of companies publishing sustainability reports (SDG indicator 12.6.1) **peer reviewed by civil society and other relevant and direct actors within their value chain.** **Why**: Unfortunately, many corporate sustainability reports become tools of self-promotion rather than useful tools to monitor and track progress on environmental and human rights standards, so in order to make these reports meaningful for the purpose of this monitoring framework, such reports should also have observations from civil society organizations and rights-holders that were directly impacted by the value chain of these companies.
2	27	C	**Additional indicator suggested after row 173**	**We suggest**: Number of companies complying with internationally standardized reporting on sustainability. **Why**: The CBD Secretariat, in coordination with other bodies within the UN system and the International Organization for Standardization (ISO) should create an biodiversity-focused international standardized reporting system for corporate sustainability practices both at national and transboundary level, which will ensure not only transparency and accountability, but also a stronger set of data on corporate behaviour and its impact over biodiversity.
2	29	C	**Additional indicator suggested after row 177**	**We suggest:** [for importing countries] Proportion of imports/export commodities from sustainable sources. **Why:** IRP global resources outlook.

2	29	C	**Additional indicator suggested after row 177**	**We suggest adding:** Certification availability for products from LDC, IPLC and other vulnerable groups. **Why:** While various sustainability certification schemes exist, they are rarely available for vulnerable groups in terms of accessibility and financial capacity. The equity principle that the GBF is looking for should include making possible for LDC, IPLC and other vulnerable groups to place their sustainable production goods in local, national and regional markets.
2	29	B	**Additional monitoring element suggested after row 177**	**We suggest adding**: Trade agreements considering environmental regulations and/or parameters relevant for biodiversity protection, conservation and sustainable use in investments and trade regulations. **Why**: Trade and investment agreements should facilitate the necessary transition to a green economy, helping to achieve sustainable development and biodiversity conservation and sustainable use. UN Environment's Environment & Trade Hub and the IISD can provide indicators.
2	29	C	**Additional indicator suggested after row 177**	**We suggest adding**: Number of countries that include biodiversity considerations in customs, investments and trade policies. **Why**: As commented before.
2	29	C	**Additional indicator suggested after row 177**	**We suggest adding**: Number of countries that require partners to include biodiversity conservation and sustainable use standards in customs, investments and trade policies. **Why**: As commented before.
2	29	C	**Additional indicator suggested after row 177**	**We suggest adding**: Number of countries that require multinational companies to comply with international biodiversity and human rights standards, both in the HQ country, the host country and beyond. **Why**: Corporate transboundary transparency should be enforced by the CBD member states, following international obligations under this convention and other treaties and international mechanisms.
2	29	C	178	**We suggest:** Number of countries with regulatory requirements for the financial sector to report on risks, impacts, dependencies associated with biodiversity loss. **Why:** As commented on Target 14
2	29	C	**Additional indicator suggested after row 178**	**We suggest:** Number of Central Banks and supervisors integrating biodiversity-related financial risks into capital and solvency requirements. **Why:** As commented before.

2	29	C	178	**We suggest adding**: Number of financial approvals and rejections considering biodiversity risk assessments. **Why**: As commented before.
2	**30**	**N/A**	**180-193 TARGET 15**	**A general comment on Target 15**: Consumption patterns are largely influenced and shaped by the action or inaction of government/official measures to control the market, and therefore we consider that the target should mention that. As it is written, it pushes the weight of responsibility and burden only to consumers, without reflecting that they only can take "responsible choices" if they have them. To that end, the burden of the leadership should rely on governments to guide productive sectors and other consumers to change behaviour patterns towards a positive outcome for biodiversity. Last but not least, education access will play a big role in delivering this target, so Avaaz strongly encourages finding additional synergies between this target and the SDG 4. By 2030, eliminate unsustainable consumption patterns **by 50%, ensuring through public and private approaches that** people everywhere understand and appreciate the value of biodiversity, make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions. **Additional comment**: Avaaz also emphasizes that successful experiences in transforming citizen behaviour involves direct and indirect incentives and also strong, well-designed public campaigns to guide consumption behaviour patterns. This target can only be achieved through a concerted coordinated action between the private and public sectors towards a transformative education on biological and cultural diversity, languages, sustainability and heritage that is promoted and integrated into school curricula at all levels, including informal education, with a strong focus on reconnection with nature through learning-by-doing and experiencing nature.
2	31	C	185	**Methodological suggestion and observation**: Avaaz wishes to note that the SDG indicator 12.3.1 is not ambitious enough and doesn't follow the latest science-backed recommendations (hence the suggestion in the target to guide a reduction in food waste and loss by 50% per capita). More indicators should be created to complement and measure this specific indicator.
2	31	C	186	**Methodological suggestion and observation**: Avaaz wishes to note that this SDG indicator 6.4.2 is also related to the SDG target of having sustainable withdrawals and supply of freshwater, and as such that should be also reflected either in target 14 or target 15.
2	31	A	**Additional monitoring element**	**We suggest adding**: Trends in reduction of wildlife consumption in urban and suburban areas.

			suggested after row 189	**Why**: In order to address environmental challenges (and health challenges associated with it), a monitoring element to monitor specifically the reduction of wildlife consumption is necessary.
2	31	C	**Additional indicator suggested after row 189**	**We suggest adding:** Indicators on (a) alternative food sources to provide food security for local communities and (b) reduction on wildlife trade/consumption (CITES). **Why**: As commented before.
2	31	C	191-192	**Methodological suggestion and observation**: It's important to distinguish between "public knowledge" and "public engagement", whereas the first concept comprises literacy and knowledge, while the second refers to behaviour, patterns and action awareness. Both indicators noted in these rows (Biodiversity Barometer and WAZA) should be either deleted or put under a different monitoring element, such as "Trends in the level of public knowledge on biodiversity". While information provided by WAZA is one of the relevant tools to understand the level of literacy of people in cities over biodiversity, Avaaz cautions that such a level of literacy doesn't correspond with behaviour towards sustainability. WAZA's own findings are clear on the fact that "there's a weak link between biodiversity-related knowledge and self-reported proconservation behaviour" and also on the "naivety" in "assuming that the two strands of knowledge regarding biodiversity (...) would essentially be complementary". Moreover, Avaaz finds the same challenge with regards to the Barometer indicator, both from the perspective of orientation and methodology.
2	31	C	191	**We suggest eliminating:** ~~Biodiversity Barometer.~~ **Why**: as commented before.
2	31	C	192	**We suggest eliminating:** ~~WAZA bio-literacy survey (Biodiversity literacy in global zoo and aquarium visitors).~~ **Why**: as commented before.

2	31	C	**Additional indicators suggested after row 192**	**We suggest adding:** Indicators related to SDG4.7.1 / SDG 12.8.1, when they're developed in depth and detail: Extent to which (i) global citizenship education and (ii) education for sustainable development (including climate change education) are mainstreamed in (a) national education policies; (b) curricula; (c) teacher education; and (d) student assessment. UNESCO has several data to track progress and could play an integral role in developing further indicators. **Why**: While this indicator is also reflected in Target 19, we believe it should be noted here as well. Global citizenship education and education for sustainable development, mainstreamed in national education policies, curricula, teacher education and student assessment, as described and articulated in the SDGs, has the potential to ignite a transformational change to build a "new normal" that can address the "throwaway culture", the cruelty towards animals and intergenerational and international solidarity values among the current and new generations.
2	31	C	193	**We suggest adding**: Financial figures on consumption of local and organic products. **Why**: Buying behaviour is one of the available metrics, although an indicator based on consumer buying behaviour should be carefully analyzed in order to avoid statistical bias and data deviation.
2	31	B	193	**We suggest:** Trends in demand for ~~more environmentally friendly~~ products from sustainable sources.
2	31	C	193	**We suggest adding:** Certification availability for products from LDC, IPLC and other vulnerable groups. **Why:** While various sustainability certification schemes exist, they are rarely available for vulnerable groups in terms of accessibility and financial capacity. The equity principle that the GBF is looking for should include making possible for LDC, IPLC and other vulnerable groups to place their sustainable production goods in local, national and regional markets.
2	31	C	**Additional indicator suggested after row 193**	**We suggest:** Trends in tools and resources developed for policy makers, businesses and civil society, including vulnerable social groups, to uptake sustainable lifestyles that address global challenges such as biodiversity conservation, resource efficiency, climate change mitigation, poverty reduction and social wellbeing. **Why**: As mentioned in general comments and in comments in Target 15.
2	**32**	**N/A**	**194-204 TARGET 16**	**A general comment on Target 16**: More transparency and accountability is needed in the articulation of this target, and given the profound impact of biotechnology in biodiversity and in our societies, measures should be widely consulted among different actors across the biodiversity policy discussion.

				For the purpose of reference, we suggest the following language: By 2030, establish and implement measures to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health. Reduce **100% of** these impacts ~~by~~ **in a transparent manner,considering the precautionary principle and taking into account risks to human health and socio-economic considerations, especially with regard to the values of biological diversity to IPLCs.** **Additional comment**: Since the Cartagena Protocol on Biosafety entered into force in 2003, the level of transparency and accountability from governments over biotechnology incidents were suboptimal to say the least. This needs to change in the name of environmental security and public health, and civil society, IPLCs and other actors should have greater access in participating in the discussion of biodiversity measures at national level.
2	32	C	195	**We suggest**: Percentage of Parties that implement their biosafety measures **agreed in open and inclusive consultations.** **Why**: Parties should improve the level of transparency and ensure full enforcement and accountability over biotechnology incidents. Biosafety measures should involve everyone, for the sake of environmental security and public health. Civil societies, IPLCs and other actors should have greater access to information and participation in public policy as technology evolves. Furthermore, this indicator is very vague, and needs more work in order to avoid confusion,potential misuse and misleading information.
2	32	C	196	**Methodological suggestion and observation**: There's no clarity on what "products of biotechnology" means or includes. A clearly articulated definition is needed to engage in a meaningful discussion and a meaningful comment on this indicator.

2	33	C	204	**We suggest**: Percentage of Parties to the Nagoya – Kuala Lumpur Supplementary Protocol implementing the relevant provisions of the Supplementary Protocol, **including but not limited to Article 2 [Art. 2.2 (b) and Art. 2.3]**. **Methodological suggestion and observation**: Avaaz believes that this indicator can be split in two, aligning with concepts of "damage" and "significant" that are stipulated in the supplementary protocol (more information here), although it shouldn't be limited to these two elements (see below). Avaaz believes an open and inclusive discussion with the scientific community, right-holders and stakeholders is urgently needed to articulate indicators in detail. Article 2.2 (b): "Damage" means an adverse effect on the conservation and sustainable use of biological diversity, taking also into account risks to human health, that: (i) Is measurable or otherwise observable taking into account, wherever available, scientifically-established baselines recognized by a competent authority that takes into account any other human induced variation and natural variation; and (ii) Is significant as set out in paragraph 3 below; Article 2.3: A "significant" adverse effect is to be determined on the basis of factors, such as: (a) The long-term or permanent change, to be understood as change that will not be redressed through natural recovery within a reasonable period of time; (b) The extent of the qualitative or quantitative changes that adversely affect the components of biological diversity; (c) The reduction of the ability of components of biological diversity to provide goods and services; (d) The extent of any adverse effects on human health in the context of the Protocol.

2	**33-34**	**N/A**	**205-2010 TARGET 17**	**A general comment on Target 17**: This target should emphasize that all perverse incentives that might cause biodiversity destruction and loss should be redirected to activities that are protective of biodiversity or eliminated, and this action should be presented as a target in itself, aiming for a 100% redirection and phasing out of perverse incentives by 2030, with a mid-term divestment target of 50% of public and private investments and incentives, including harmful subsidies for biodiversity. This should also include sub-targets to identify all perverse incentives (including subsidies on livestock and aquaculture production), and setting up a clear timeline with verifiable sub-targets to ensure implementation, contributing significantly to resource mobilization, oriented to systemic changes towards living in harmony with the whole planet. This is doable and an increasing number of State and non-State actors are calling for this direction. Avaaz is suggesting very specific edits in order to add the ambition and the transformational spirit that is currently lacking. **For the purpose of reference, we suggest the following language:** By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including ~~[X]~~ **100%** reduction in ~~the most~~ harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity. **Additional comment:** A big part of the success of the GBF and the Agenda 2030 will depend on this. And it's possible, since more governments, researchers, and NGOs are increasingly recognizing subsidies as a major barrier to the transformation of our economies. Aichi Target 3 (AT3) was clear that subsidies and incentives that are harmful to biodiversity should be phased out or reformed by 2020. This didn't happen, but the international community has an opportunity in the current context to right that wrong. A strong target of eliminating harmful subsidies within the CBD post 2020 framework will accelerate the implementation of other SDGs, and it will free substantial financial resources to be used to support the implementation of the post-2020 targets and the already agreed SDGs targets (in particular, SDG2, SDG8, SDG10, SDG12 and SDG13). Public investments in biodiversity conservation and restoration, both nationally and internationally, make little sense if they are outpaced by public investments in biodiversity destruction. A strong target on tackling perverse subsidies will be hugely beneficial for the goals of all Rio conventions. For instance, unsustainable livestock production is responsible for an estimated 14% of global greenhouse gas emissions, and addressing unsustainable livestock production and consumption is not just a matter of behavioural change, but is contingent on a redirection of perverse incentives and other regulatory and economic tools.

2	33	B	**Additional monitoring element suggested after row 205**	**We suggest adding**: Trends in positive incentives and resource mobilization for IPLCs. **Why**: Given the central role of IPCs in delivering biodiversity outcomes, and given its proven effectiveness and efficiency in conserving ecosystems, there's a merit in having a distinct element for this monitoring framework. Measuring the precision of this specific dimension of positive incentives could further the necessary awareness among policy makers on the role of IPLCs in ecological security.
2	33	C	**Additional indicator suggested after row 205**	**We suggest adding**: Amount of financial resources mobilized through redirected perverse investments and incentives for peoples and nature. **Why**: There's a strategic urgency to mobilize resources towards the recognition and support of ICCAs, agroecology and food sovereignty systems, sharing economies and local currencies and the development of alternative indicators for national health, wealth and wellbeing. The OECD, GEF, the Local Biodiversity Outlooks and IPLCs and community organizations, networks and federations could be the key actors in the design, sourcing and delivering of data for this indicator.
2	33-34	C	**Additional indicator suggested after row 208**	**We suggest:** number of biodiversity harmful subsidies on fisheries and forest plantations. **Why:** As commented on Target 17.
2	33	C	**Additional indicator suggested after row 208**	**We suggest adding:** Number of countries with financial assessments on incentives and subsidies that are harmful to biodiversity across all sectors (under the element T17.2. Elimination, phasing out or reform of incentives and subsidies the most harmful to biodiversity). **Why:** An indicator on countries with complete and comprehensive assessments on incentives and subsidies harmful to biodiversity will help to strengthen the accountability of this framework and will help the international community to analyze steps to meet this target.
2	33	C	**Additional indicator suggested after row 208**	**We suggest adding:** Total sum of harmful subsidies in national and international financial flows, across all sectors (under the element T17.2. Elimination, phasing out or reform of incentives and subsidies the most harmful to biodiversity). **Why:** As commented before. Institutions such as the WTO and several UN agencies have different indicators and baselines that need systematization and standardization.

2	33	B	**Additional monitoring element suggested after row 209**	**We suggest adding**: Trends in harmful incentives and subsidies per sector. **Why**: Measuring with more detail and precision the specific harmful incentives and subsidies will allow the framework, and the public, to start the necessary conversations on the hows and whys of the current financial flow and its impact in global ecological security.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of fossil-fuel subsidies per unit of GDP (production and consumption). **Why**: Information on subsidies is available from various sources (OECD, IEA, ISSD, IMF, WB) and should be further systematized for the purpose of this monitoring framework.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of industrial unsustainable logging subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of monoculture forest plantations subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of intensive agriculture subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of unsustainable fisheries subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of unsustainable infrastructure subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of unsustainable mining subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of oil subsidies per unit of GDP (production and consumption). **Why**: As commented above.

2	33	C	**Additional indicator suggested after row 210**	**We suggest adding:** Amount of gas subsidies per unit of GDP (production and consumption). **Why**: As commented above.
2	**34**	**N/A**	**211-225 TARGET 18**	**A general comment on Target 18**: Avaaz believes that it's imperative to step up in the ambition on this target. **For the purpose of reference, we suggest the following language:** By 2030, increase by ~~[X%]~~ **50%** financial resources from all international and domestic sources, through new, additional and effective financial resources commensurate with the ambition of the goals and targets of the Framework and implement the strategy for capacity-building and technology transfer and scientific cooperation to meet the needs for implementing the post 2020 global biodiversity framework. **Additional comment**: The 2015 multilateral milestone (Addis Ababa Action Agenda, UNSDGs & the Paris Agreement) set a new ground for environmentally sustainable economic development, we need a progress indicator in line with this new global paradigm.
2	34	C	**Additional indicator suggested after row 216**	**We suggest adding**: Proportion of new finance cross-monitoring mechanisms. **Why**: Countries should aim for a greater coordination to monitor biodiversity-related finance mechanisms, in a timely manner, in order to strengthen and accelerate policy synergies towards biodiversity-related actions.
2	34	C	**Additional indicator suggested after row 216**	**We suggest adding:** Trade agreements considering environmental regulations and/or parameters relevant for biodiversity protection, conservation and sustainable use. **Why**: Trade and investment agreements should facilitate the necessary transition to a green economy, helping to achieve sustainable development and biodiversity conservation and sustainable use. UN Environment's Environment & Trade Hub and the IISD can provide indicators.
2	35	B	218	**We suggest:** Trends in the mobilization of financial resources from ~~charitable~~ **civil society and non-governmental** organizations. **Why**: "Charitable" organizations are understood as entities with very limited mandates on provision of charitable services, while civil society and non-governmental organizations represent a wider and more diverse type of non-state and non-profit entities, including public policy, advocacy, activism, awareness, people's mobilization and aid, development and science work.

2	36	C	219	**Methodological suggestion and observation**: Indicator could the number of parties with a nationally determined target for increasing levels of domestic resources does not measure the increase in public domestic financial resources.
2	36	C	223	**We suggest adding:** Dollar value targeted to capacity building. **Why:** As commented on Target 18.
2	36	C	224	**We suggest adding:** Total amount of approved funding for developing countries to promote the development, transfer, dissemination and diffusion of environmentally sound technologies (SDG indicator 17.7.1)**, relevant for biodiversity conservation and sustainable use**. **Why**: As commented on Target 18.
2	**36**	**N/A**	**226-238 TARGET 19**	**A general comment on Target 19:** Avaaz is concerned that protections for IPLCs, specifically the free, prior and informed consent (FPIC) dimension are absent from this iteration. We believe that FPIC should be put back in the drafting process. **For the purpose of reference, we suggest the following language:** By 2030, ensure that quality information, including traditional **indigenous and local** knowledge, is available to decision makers and to the public, **based on best available knowledge** for the effective, **adaptive, evidence based and ecosystem based** management of biodiversity through promoting awareness, education and research **with free, prior and informed consent.** **Additional comment:** Recommendations from IPBES Global Assessment report 2019 also outlines the importance of local knowledge, and as such the term "local" should be included.
2	36	C	234	Methodological suggestion and observation: Indicators associated with component A 234 would be better placed under target 15 since education is crucial to facilitate the aims of target 15. Indicators C 234-235 are a repetition.
2	37	C	234	**We suggest adding:** Extent to which (i) global citizenship education and (ii) education for sustainable development**, especially regarding biodiversity conservation, sustainable use and impact on climate change,** are mainstreamed in (a) national education policies; (b) curricula **across all education levels**; (c) teacher education; and (d) student assessment (SDG indicators 4.71and 12.8.1). **Why**: We suggest pointing out biodiversity in the indicator since T19.3 indicator (C) does not reflect the monitoring element (B) and education on environmental civics or global citizenship are not internationally standardized, therefore there's a risk that biodiversity might not be covered, or it might be suboptimally addressed.

2	38	B	**Additional monitoring element suggested after row 238**	**We suggest adding**: Availability of legal and policy frameworks to guarantee the human right to a safe, clean, healthy and sustainable environment and the safety of IPLCs and environmental and human rights defenders in environmental matters. **Why**: As referenced in Target 20 and in some additional suggestions. Please also see Addendum 2 on the obligations of the States with regards human rights.
2	38	C	**Additional indicator suggested after row 238**	**We suggest:** Number of countries adopting formal FPIC protocols. **Why:** as mandated by the Nagoya Protocol.
2	38	C	**Additional indicator suggested after row 238**	**We suggest:** Number of formally adopted and recognized community protocols. **Why:** As above.
2	38	C	239	**We suggest:** Trends in degree to which **local and** traditional knowledge and practices are respected through: full integration, participation and safeguards in national implementation of the GBF (adapted from decision X/43). **Why:** While decision X/43 is clear in its focus on traditional knowledge and practices, recommendations from IPBES Global Assessment report 2019 also outlines the importance to include local knowledge as well.
2	**38**	**N/A**	**239-248 TARGET 20**	**A general comment on Target 20:** Avaaz welcomes this target, although offers a caution that its inclusion as the last one in the document (and its inconsistent articulation of components, monitoring elements, indicators and baselines) could be read and understood like IPLCs are not essential actors of this framework. **For the purpose of reference, we suggest the following language:** By 2030, ensure equitable participation in decision-making related to biodiversity and ensure rights over relevant resources of indigenous peoples and local communities, women and girls as well as youth~~, in accordance with national circumstances~~ and, **regarding IPLCs, subject to their prior informed consent**. **Additional comment:** We suggest deleting the reference "in accordance with national circumstances" since this is a global framework and parties already have recognized their international obligations on indigenous rights (ILO, UNDRIP) and human rights, through several treaties, conventions and instruments, including the article 8(j) of this Convention and its Mo'otz kuxtal voluntary guidelines.

2	38-39	C	239-248	**Methodological suggestion and observation**: All indicators need to be revised considering specificities related to CBD targets. Current ones read as the ones imported from SDGs. Furthermore, since some SDG 15 targets are set to expire in 2020, they should be reviewed for the purpose of this framework. Indicators for topics related to SDG 15 should be used in relation to IPLCs, traditional knowledge associated with agriculture and forestry, sustainable forest management, traditional agriculture (e.g. GIAHS), among others. Traditional knowledge is only mentioned once (line 239), and is not considered in conservation targets, not even associated with genetic resources conservation. For that reason, indicators for SDG 15.6 should be used within this target.
2	38	B	**Additional monitoring element suggested after row 238**	**We suggest adding:** Trends in the effective implementation of strategic participatory practices for the conservation of biological diversity and the sustainable use of its components. **Why:** As mandated by the United Nations Declaration on the Rights of Indigenous Peoples, particularly in articles 25 through 32, especially regarding: (a) Article 31: 1. Indigenous peoples have the right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions, as well as the manifestations of their sciences, technologies and cultures, including human and genetic resources, seeds, medicines, knowledge of the properties of fauna and flora, oral traditions, literatures, designs, sports and traditional games and visual and performing arts. They also have the right to maintain, control, protect and develop their intellectual property over such cultural heritage, traditional knowledge, and tradition-al cultural expressions; 2. In conjunction with indigenous peoples, *States shall take effective measures to recognize and protect the exercise of these rights*. (b) Article 32: 1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources; 2. *States shall consult* and cooperate in good faith with the indigenous peoples concerned through their own representative institutions *in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources*, particularly in connection with the development, utilization or exploitation of mineral, water or other resources; 3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact. (The *Italic* and underline print is ours).

2	38	A	**Additional component suggested after row 238**	**We suggest adding:** As new T.20.X: Mechanisms to facilitate addressing the underlying causes of biodiversity loss and foster biodiversity mainstreaming across all sectors. **Why**: As noted in Decision 14/3, CBD COP 14.
2	38	B	**Additional monitoring element suggested after row 238**	**We suggest adding:** Trends in coordination mechanisms established and strengthened to facilitate addressing the underlying causes of biodiversity loss and foster biodiversity mainstreaming across all sectors. **Why**: As noted in Decision 14/3, CBD COP 14.
2	38	C	**Additional indicator element suggested after row 238**	**We suggest adding**: Trends in work with indigenous peoples and local communities and all relevant stakeholders across the public, private and civil society sectors in order to establish and strengthen coordination mechanisms to facilitate addressing the underlying causes of biodiversity loss and foster biodiversity mainstreaming across all sectors. **Why**: As noted in Decision 14/3, CBD COP 14.
2	38	A	239	**We suggest:** T20.1. ~~Equitable,~~ **Full and effective** participation of IPLCs in decision-making related to biodiversity and rights over natural resources. **Why:** Agreed CBD language (Art. 8) is "full and effective participation". Following the remarks on the "General Comments", determining who would (or should) decide which resources are "relevant" will be at the very least a potential drag in negotiating the GBF.
2	38	B	239	**We suggest:** Trends in the participation of indigenous peoples and local communities in decision making **regarding biodiversity and the protection, conservation and sustainable use and utilization of its components.** **Why:** As commented before.

2	38	C	239	**We suggest:** Trends in **the full integration and safeguard** of ~~degree to which~~ **local and** traditional knowledge and practices **in national implementation of the GBF** ~~are respected~~ through **the strategic, full and effective participation of IPLC.** ~~full integration, participation and safeguards in national implementation of the Strategic Plan (decision X/43).~~ **Why**: It is not clear that this proposed indicator is an impact indicator. "trends in degree to which traditional knowledge and practices are respected" does not automatically ensure strategic participation of IPLCs, therefore the suggested changes in the indicator text, considering that the monitoring element is "trends in the participation of indigenous peoples and local communities in decision making". The consideration of local knowledge and practices, along with traditional knowledge and practices is supported by IPBES.
2	39	B	241	**We suggest:** Trends in the recognition of rights over ~~relevant resources~~ **biodiversity and the protection, conservation and sustainable use and utilization of its components**. **Why**: As commented before.
2	39	C	241	**We suggest**: Trends in the practice of **local and** traditional occupations (decision X/43) **related to biodiversity protection, conservation and sustainable use and utilization.** **Why:** As commented before.
2	39	C	**Additional indicator suggested after row 241**	**We suggest:** Trends in formal recognition of ICCAs and IP's territories **Why:** as commented in Target 20.
2	39	C	**Additional indicator suggested after row 241**	**We suggest:** Percentage of IPLC in management bodies/boards/governance institutions of natural resources **Why:** as commented in Target 20.
2	39	C	**Additional indicator suggested after row 241**	**We suggest:** Number of IPLC relocated/displaced from their territories; zero victims among environmental defenders **Why:** as commented in Target 20.
2	39	C	**Additional indicator suggested after row 241**	**We suggest adding:** Number of actions at national level that consider the recommendations from UNHRC on issues related to biodiversity and human rights. **Why**: See addendum 1 on human rights, with all the obligations from the Parties, at the end of this document.

2	39	C	**Additional indicator suggested after row 241**	**We suggest adding:** [Expert assessment on] whether legal frameworks are in place to promote, enforce and monitor equality and non-discrimination on the basis of ethnicity. **Why:** Please refer to SDG 10 on Reducing Inequalities (with target 10.3 aimed at 10.3) ensures equal opportunity and reduces inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard). Beyond SDGs 16, 5 and 10, the implementation and monitoring of the 2030 Agenda as a whole rest on the meaningful participation of all actors in society, in particular those most at risk of discrimination and being left behind. More information here.
2	39	C	**Additional indicator suggested after row 242**	**We suggest adding:** Trends in national legislation related to rights over resources and work toward a rights based approach. **Why**: This indicator must be included in order to track progress over commitments from the parties to this convention and other international treaties, conventions and mechanisms.
2	39	C	**Additional indicator suggested after row 242**	**We suggest adding:** Trends in the implementation of resource rights-based approaches in development and conservation plans and programmes. **Why**: As commented before.
2	39	C	242	**We suggest:** Trends in land-use change and land tenure in the ~~**traditional territories**~~ **lands or territories** of indigenous and local communities, **including those that were traditionally owned or otherwise occupied or used**. **Why:** "Traditional territories" are not enough as IPLCs may occupy other territories. Suggested new wording comes from the United Nations Declaration on the Rights of Indigenous Peoples cited before. Adapted from (decision X/43).
2	39	C	**Additional indicator suggested after row 242**	**We suggest adding:** proportion of total adult population with secure tenure rights to land, with legally recognized documentation and who perceive their rights to land as secure, by sex and by type of tenure. **Why:** as commented on Target 20.
2	40	C	243	**We suggest eliminating:** ~~Proportion of population who believe decision making is inclusive and responsive, by sex, age, disability and population group (SDG indicator 16.7.2)~~.

				Why: Without disregarding the uttermost importance of inclusive and responsive participation of all sectors in decision making, this indicator is far too subjective and ambiguous to have, and it can be misused.
2	39	A	244	**We suggest:** T20.2. Equitable **full leadership and** participation of women and girls in decision-making related to biodiversity and rights over relevant resources. **Why:** In line with recommendations from several UN agencies and mechanisms, and following the criteria of the SDGs, women and girls should not only participate, but lead in the decision-making processes.
2	40	C	247	**We suggest adding**: Number of parties with appointed representative UN Youth Delegates to Rio-conventions, in accordance with the United Nations Guide to the Youth Delegate Programme criteria. **Why:** Youth mobilization has played a transformational role in discourse and international politics and their voice should be reflected not only in the streets, but also in global decision-making processes, which should be monitored at all levels within all the Rio conventions. The UN Department of Economic and Social Affairs (DESA) strongly recommends the presence of youth Delegates at UN processes, and the criteria to define UN youth delegate is described in the UN Guide to the Youth Delegate Programme.
2	40	C	247	**We suggest adding:** Number of parties with cross-sectorial agreed strategies, including equitable participation of youth in decision-making within NBSAPs processes. **Why:** It's important to closely monitor youth participation in NBSAPs and other biodiversity-relevant national processes, in particular youth within vulnerable groups, women and IPLCs.
2	40	C	247	**We suggest adding:** Number of parties with allocated resources to promote youth equitable participation in decision-making. **Why:** Youth participation should be encouraged and given the fact that youth in general don't have adequate financial resources, state parties should provide them, following international obligations, in order to ensure diversity and representation in youth engagement. Youth participation resource allocation is important to monitor in order to ensure quality participation across all youth groups, and following the principle of equity and inclusiveness.
-	-	-	-	**END OF COMMENTS**

Addendum 1

On the need for a greater consistency between biodiversity and climate policy

CBD/SBSTTA 23/3[2] (19 August2019) clearly indicates that biodiversity and ecosystems "play an important role in strengthening the global response to climate change, while delivering multiple benefits" and that "climate change and biodiversity loss are inseparable threats to humankind and must be addressed together."

The document says: "*Biodiversity and climate are interconnected in many ways. On the one hand, biodiversity is strongly affected by climate change, with negative consequences for human well-being and the long-term stability of critical ecosystems. On the other hand, the conservation of biodiversity, through the ecosystem services it supports, makes an indispensable contribution to addressing climate change.*"

It also says: "*Ecosystem-based approaches can also contribute significantly to climate change adaptation and disaster risk reduction thereby reducing the vulnerability of people, especially indigenous people and local communities and those disproportionately impacted, and the ecosystems upon which they depend, in the face of climate change.*"

Furthermore, the Review of New Scientific and Technical Information on Biodiversity and Climate Change says: *"Protecting and conserving biodiversity and ecosystems is critical in order to maintain and increase the resilience and reduce the vulnerability of ecosystems and people in the face of the adverse effects of climate change, as well as to maintain the capacity of ecosystems to store carbon.*"

It also says: *"In order to limit global warming to well below 2°C, and closer to 1.5°C above pre-industrial levels, strong actions are needed to protect and enhance carbon sinks on land and in the oceans through ecosystem-based approaches as well as to reduce greenhouse gas emissions from fossil fuel use and other industrial and agricultural activities.*"

In that same line, the draft recommendation submitted by the Chair in CBD/SBSTTA/23/L.4 (28 November 2019) says:

> *Notes* that nature-based solutions *(sic)* with biodiversity safeguards are an essential component of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction;
>
> *Stresses* the need for urgent climate action at all levels and across all sectors and the need to address biodiversity loss and climate change in an integrated manner;
>
> *Invites* the Open-ended Working Group on the Post-2020 Global Biodiversity Framework, as well as the associated thematic workshops, to consider the interlinkages and interdependence between biodiversity, climate change, desertification and land degradation when developing the post-2020 global biodiversity framework, in particular the use of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction...
>
> *Recommends* that the Conference of the Parties at its fifteenth meeting adopt a

2 Please refer to https://www.cbd.int/doc/c/326e/cf86/773f944a5e06b75dfc5866bf/sbstta-23-03-en.pdf

decision.

Recognizing that biodiversity loss, climate change, desertification and land degradation are inseparable and interdependent challenges of unprecedented severity that must be coherently and consistently addressed urgently in an integrated manner in order to achieve the goals of the post- 2020 global biodiversity framework and the Paris Agreement,7 as well as [those voluntary targets concerning desertification, land degradation and drought under the United Nations Convention to Combat Desertification], and the Sustainable Development Goals and the Pan-African Action Agenda on Ecosystem Restoration for Increased Resilience, among other relevant regional initiatives,

Emphasizing that, while climate change should primarily be mitigated by reducing anthropogenic emissions, the enhanced use of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction is also indispensable to achieve multiple globally agreed goals including the goals of the Paris Agreement.

Recalling decisions VII/15, IX/16, X/33, XIII/4, and 14/5, and, in particular, the critical role of biodiversity and ecosystem functions and services for climate change adaptation, mitigation and disaster risk reduction, the draft of the Chair (…)

Urges Parties and *invites* other Governments, relevant organizations and stakeholders, including productive sectors, to promote and upscale the use of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction, including ecosystem protection and restoration, sustainable infrastructure (sic) and ecosystem management, including agroecosystems, and taking into account their potential for synergies for addressing biodiversity loss and climate change while providing multiple benefits, including for human health, poverty alleviation and sustainable development, as well as their ability to avoid unfavourable trade-offs between climate change mitigation and biodiversity conservation.

The Chair also:

Welcomes the *Global Assessment Report on Biodiversity and Ecosystem Services* issued by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services; and the special reports of the Intergovernmental Panel on Climate Change on the impacts of global warming of 1.5°C above pre-industrial levels; climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems; and the ocean and cryosphere in a changing climate;

Acknowledges the ongoing joint activities between the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services and the Intergovernmental Panel on Climate Change on biodiversity and climate change.

Additionally, decision 1/CP.25 taken in Madrid at the 25th Conference of the Parties of the Climate Convention (UNFCCC COP 25) "*underlines* the potential contribution of nature to addressing climate

change and its impacts and the need to address biodiversity loss and climate change in an integrated manner" (p.15).

Last but not least, the Preamble of the Paris Agreement notes the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity, recognized by some cultures as Mother Earth, and the importance for some of the concept of "climate justice", when taking action to address climate change.

Addendum 2

On the obligations from the States on respecting IPLCs rights

As biodiversity regeneration has survived better in areas where indigenous and local communities live than in areas where others live, states can fulfill their CBD obligations on in-situ conservation and sustainable use of biodiversity only so far as they respect rights recognised for these communities to such their life and their local biodiversity regeneration adapted ways of knowing, using and treating plants, animals etc., which sustained biodiversity regeneration which fulfills human rights so that:

01. Each state shall ensure it will under its laws "respect, preserve and maintain knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity and promote their wider application" with such communities' approval and involvement (CBD article 8(j)).

02. To duly respect and maintain such knowledge and practices of these communities, states must respect the rights recognised to these communities correspondingly to their local biodiversity regeneration adapted ways of knowing, using and treating plants, animals and other life, their rights in respect to "indigenous and community conserved areas and territories, community-based management, customary sustainable use and community governance of biodiversity [...] taking into account international instruments and law related to human rights", like CBD states parties have already committed to do. (UNEP/CBD/COP/DEC/XII/5, Biodiversity for poverty eradication and sustainable development, paragraph 11).

03. Each state shall "protect and encourage customary use of biological resources in accordance with traditional cultural practices that are compatible with conservation or sustainable use requirements" - as indicated by their traditional occupations and their customary land use and tenure - and "support local populations to develop and implement remedial action in degraded areas where biological diversity has been reduced". (CBD articles 10 c-d).

04. "Recognizing the close and traditional dependence of many indigenous and local communities embodying traditional lifestyles on biological resources" (preamble) insofar as these are "lifestyles relevant for the conservation and sustainable use", states have to "respect, preserve and maintain knowledge, innovations and practices" of such communities (8 j) and "protect and encourage customary use of biological resources in accordance with traditional cultural practices that are compatible with conservation or sustainable use requirements" (CBD article 10 c).

05. Also ecosystem approach requires in "management of land, water and living resources", that "rights (...) should be recognized" for "communities living on the land" compliant to how "the closer management is to the ecosystem, the greater the responsibility, ownership, accountability,

participation, and use of local knowledge". (CBD Ecosystem Principles 1-2) And sustainable use needs "promoting alternative non-consumptive uses of these resources" in terms of "non-monetary values". (CBD Addis Ababa Principles and Guidelines for Sustainable use of Biodiversity, principle 12 & operational guidelines).

06. As such communities thus "depend directly on biodiversity and its customary sustainable use and management for their livelihoods, resilience and cultures and are therefore well placed [...] to efficiently and economically manage ecosystems" States are obliged to respect and protect such cultures of economy by which communities can "efficiently and economically manage ecosystems". (CBD Customary Sustainable Use Plan of Action UNEP/CBD/COP/DEC/XII/12, B, Annex, paragraph 6 b).

07. States are obliged to "adopt economically and socially sound measures that act as incentives for the conservation and sustainable use" (CBD article 11) and to learn thus from the abilities to "efficiently and economically manage ecosystems" from those biodiversity-dependent communities and to "promote their wider application" with such communities' approval and involvement (CBD article 8(j)) on how such economical use and treatment of ecosystems needs to be managed building international "cooperation for the development and use of (...) indigenous and traditional technologies". (article 18.4)

08. States have to retain their "sovereign right" (CBD article 3) to use and access their natural wealth , prioritising their obligations under the UN Charter based international law "based on the principle of the sovereign equality" of states whose common legal sovereign status and action are further "based on respect for the principle of equal rights and self-determination of peoples" (UN Charter articles 1.2, 1.3, 2.1, 55-56 and 103) under which "all peoples may, for their own ends, freely dispose of their natural wealth and resources" with permanent sovereignty over them and so that "in no case may a people be deprived of its own means of subsistence" (article 1.2 of the main UN human rights treaties, ICCPR and ICESCR).

09. As peoples' right to live self-determined life in terms of their development and subsistence and to use for these the natural wealth by the regeneration of which they live , requires that the diversity of such natural wealth by which they live has to be sustained, this basis of international law requires biodiversity to be saved also as basis of the realisation of our inalienable human rights. Thus rights to activities which destroy world's biodiversity cannot comply with the totality of international law: All rights and obligations have to be respected by CBD implementation as it "shall not affect the rights and obligations (...) deriving from any existing international agreement, except where the exercise of those rights and obligations would cause a serious damage or threat to biological diversity". (CBD article 22).

10. As the CBD has to respect the totality of rights recognised under international law, it cannot respect rights which would violate the totality of rights by allowing rights to activities which "would cause a serious damage or threat to biological diversity" (CBD article 22). As accelerating global biodiversity loss is in many ways driven or boosted by certain commercial types of rights over the use of biodiverse lands, forests and waters , such commercial rights in many ways "cause a serious damage or threat to biological diversity" and the states parties of the CBD are thus under article 22 of the Convention -and articles 3,4, 8 (c) & (l) and 18.4- obliged to correct those rights or their implementation in ways which prevent such damage and threat.

Addendum 3

On IPBES findings on IPLCs role in biodiversity

The 2019 IPBES assessment cited evidence that much of the world's terrestrial wild and domesticated biodiversity (70%) lies in areas traditionally managed, owned, used or occupied by IPLCs and that despite pressures, IPLCs have often managed their landscapes and seascapes in ways that remain compatible with, or actively support, biodiversity conservation. The IPBES assessment includes approximately 35% of the area that is formally protected and approximately 35% of all remaining terrestrial areas with very low human intervention.

Furthermore, the 2019 IPBES assessment is clear that "goals for conserving and sustainably using nature cannot be met by current trajectories, and goals for 2030 and beyond may only be achieved through transformative changes across economic, social, political and technological factors" and it identifies leverage points for that transformation, including the adherence to human rights in conservation decisions, addressing inequalities, ensuring inclusive decision-making and the fair and equitable sharing of benefits.

The report cannot be more clear: "Recognizing the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities, and ensuring their inclusion and participation in environmental governance, often enhances their quality of life and the conservation, restoration and sustainable use of nature, which is relevant to broader society."

The text should put in place effective mechanisms to ensure full participation of IPLCs in all decision-making processes regarding biodiversity, or any projects related to its conservation and restoration. And it should place special emphasis on participation by those affected by its loss, such as family farmers, small scale fishers, women, and youth, at all levels, local, national and international. Here it is important to address power imbalances in participatory processes and guarantee full access to information for rights-holders regarding all projects that could possibly damage biodiversity as well as guaranteeing Free Prior and Informed Consent and the right to oppose projects on principle.

The 2019 IPBES assessment cited evidence that much of the world's terrestrial wild and domesticated biodiversity (70%) lies in areas traditionally managed, owned, used or occupied by IPLCs and that despite pressures, IPLCs have often managed their landscapes and seascapes in ways that remain compatible with, or actively support, biodiversity conservation. The IPBES assessment includes approximately 35% of the area that is formally protected and approximately 35% of all remaining terrestrial areas with very low human intervention.

New York, August 15, 2020

Ms. Elizabeth Maruma Mrema
Executive Secretary
Convention on Biological Diversity
413 Saint-Jacques Street, Suite 800
Montreal, Quebec, Canada H2Y 1N9

Dear Ms. Mrema:

Avaaz appreciates the invitation to provide input in response to the Secretariat's 25 June 2020 Notification No. 2020-0045 regarding peer review of draft documents for the twenty-fourth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA 24). We are pleased to have the opportunity to share the attached information.

Please **see our response** to the Draft Monitoring for the post-2020 global biodiversity framework.

We're also **providing our input** to the information document on the Linkages between the post-2020 global biodiversity framework and 2030 agenda for sustainable development. And, in conjunction with one of our partner organizations, OneEarth, we're presenting **our joint perspective** to the Information Document on Indicators for the post-2020 global biodiversity framework, prepared for SBSTTA24 by UNEP-WCMC in collaboration with the Biodiversity Indicators Partnership.

Avaaz has over 60 million members worldwide that have taken action on a wide variety of critical environmental campaigns ranging from fighting to protect bees from chemical harm, to protecting keystone species and their habitats, to fighting plastic pollution and deep sea mining in our oceans. We also campaign to stop unsustainable models, from tackling food waste to chemical-dependent farming. And we advocate to get our Planet powered by 100% clean energy to avoid climate disaster.

Our membership has donated money, protected land, marched in the streets, called their legislators, and signed numerous petitions in the pursuit of preserving 50% of the planet and managing sustainably the other half, with the support and leadership of indigenous peoples and local communities. For your reference, please read our submission on the Zero Draft, which outlines our vision for a resilient, healthy and just future for everyone.

Thank you for your consideration.

Sincerely,

Oscar Soria
Campaign Director
Avaaz