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**Ref:CBD/POST2020/PREP/1/1**

 4-15-19

Dear Executive Secretary,

Wild Heritage and the Australian Rainforest Conservation Society are writing in response to the notification of 25 January, 2019, **Post-2020 Global Biodiversity Framework: Discussion Paper**. We note at the outset the excellent progress made in Egypt at COP14 on two points of fundamental importance to biodiversity conservation generally and the Post-2020 framework discussions, namely the importance of ecosystem integrity as a unifying concept for the Rio Conventions and, more specifically, the crucial importance of primary forests to both biodiversity conservation and climate change mitigation and adaptation. Our views regarding these two key points were summarized in our December 15 submission responding to notification Ref:SCBD/OES/DC/RH/KNM/87538 and are reattached following this submission. We would like to submit the following additional views which address the **B. Ambition of the post-2020 global biodiversity framework**, the **C. 2050 Vision for Biodiversity**, the **D. Mission** and **E.** **Biodiversity Targets.**

**B. Ambition**

Regarding the interpretation of “ambitious” under the post-2020 global biodiversity framework, in our view it should include maintaining ecosystem integrity where it still exists, which means preventing further degradation, fragmentation and loss of the world’s primary forests and other primary ecosystems (grasslands, mangroves, wetlands etc.), including via industrial logging, which has not proven sustainable in primary forests even with best practices. Efforts to halt biodiversity loss and to promote ecosystem restoration are meaningless if we continue to degrade primary ecosystems at the same time. Primary ecosystems, and primary forests specifically, protect the highest levels of biodiversity as well as the highest carbon stocks: undisturbed ecosystems with high ecosystem integrity always protect more species and store more carbon than degraded ecosystems of the same type. Primary ecosystems also maximize a broad range of additional ecosystem services (water quality, erosion control, livelihoods etc.). Given extremely tight timelines to reverse the interrelated and accelerating biodiversity and climate change crises, we can no longer afford to ignore this basic fact.

“Ambitious” should also entail much broader restoration goals than the 15% goal currently included in the Aichi Targets, and should specify explicit mention of the need for long-term “ecological restoration” as the term “restoration” can be interpreted to include a broad range of land-uses, including plantations, which are of little use in a biodiversity or climate change context. While restoration efforts offer enormous potential to help safeguard biodiversity and drawdown globally significant amounts of carbon dioxide, achieving full ecological restoration of an ecosystem can take decades to centuries: it is therefore essential to first protect and maintain ecosystem integrity wherever it can still be found.

**C. 2050 Vision for Biodiversity**

Living in harmony with nature means that we protect and restore ecosystem integrity (which must include a focus on primary forests as they constitute both the largest terrestrial carbon stores and represent at least two thirds of the world’s terrestrial biodiversity) to the extent necessary to ensure the persistence of the full diversity of life on Earth, at all levels of biodiversity, while also ensuring that we avoid 1.5°C of average global warming of the planet. Thus, living in harmony with nature not only means ensuring biodiversity protection, it means protecting and restoring ecosystem integrity to the maximum extent possible so as to protect existing carbon stocks and enhance degraded carbon stocks through ecological restoration. Living in harmony with nature cannot include exchanging primary ecosystems for degraded ecosystems or plantations and cannot be based on offset/mitigation approaches: these have failed to slow biodiversity loss.

**Mitigating and adapting to Climate Change**

CBD COP 14/5 recognized the two way flows between climate and biodiversity and most importantly that ongoing damage, fragmentation and loss of ecosystem integrity would release safely stored carbon into the atmosphere, exacerbating climate change in a downwards, reinforcing spiral of biodiversity decline, loss of ecosystem integrity, loss of carbon storage, loss of adaptive capacity and escalating climate change.

Efforts to ensure climate action in land, forests and marine ecosystems supports biodiversity protection and enhances ecosystem integrity, as per the call in the preamble to the Paris Agreement, must be greatly scaled up and the CBD must make it clear that climate action in land and forests will likely fail unless strong integrative action is prioritized. Prioritizing primary forest protection; ensuring restoration is linked to primary forest protection by buffering and reconnecting areas of primary forests; and focusing restoration on encouraging regeneration of degraded natural forests should be promoted as robust examples of integrating climate mitigation, adaptation and biodiversity goals.

**D. Mission**

A mission statement for the post-2020 global biodiversity framework is to ensure the diversity of life on Earth by working jointly with the Rio Conventions and other biodiversity conventions to:

* Halt the loss of primary forests and other primary ecosystems; and,
* Undertake ecological restoration at scale.

**E.** **Biodiversity Targets**

The Aichi Targets focus to a large extent on reducing threats/pressures to biodiversity while making incremental gains in conservation and restoration and setting targets that are not science-based as they are in the UNFCCC. That incremental approach, rather than the focal areas of the targets themselves, is what makes the Aichi Targets problematic going forward given the magnitude of the climate and biodiversity crises. New biodiversity targets must have a clear objective of maintaining and restoring ecosystem integrity and protecting the diversity of life on Earth. It is no longer sufficient to focus on improving/enhancing or reducing pressure. As such, new biodiversity targets must include ending degradation, fragmentation and loss of primary ecosystems, combined with very ambitious ecological restoration targets. This will mean conservation targets of about 50% or higher to ensure we live in harmony with nature.

**Appendix 1**

**Ref:SCBD/OES/DC/RH/KNM/87538**

Dear Executive Secretary,

The undersigned organizations are writing in response to the notification of 16 July, 2018, **Invitation for views on the preparation, scope and content of the post-2020 global biodiversity framework**. We note the rapidly accelerating biodiversity and climate change crises, the clear evidence that these crises are inextricably linked and the critical nature of the post-2020 global biodiversity framework as the next decade may well be the last opportunity to avert catastrophic biodiversity and climate change scenarios. We therefore respectfully submit that the points listed below are crucial for an effective post-2020 target and for making progress towards the 2050 vision.

* **Ecosystem Integrity:** the concept of “ecosystem integrity” was recently included in CBD/COP14/L23 Biodiversity and climate change. This important concept also figures prominently in other key international agreements, including principle 7 of the Rio Declaration and the preambular text in the Paris Agreement under the United Nations Framework Convention on Climate Change.

We argue that ecosystem integrity should remain a foundational, unifying concept on which the post-2020 global biodiversity must build. Ecosystems with a high degree of integrity are crucial because they have all, or nearly all their characteristic, evolved biodiversity, but also because by virtue of retaining their biodiversity they also maximize ecosystem services. Ecosystems with a high degree of integrity maintain larger and more secure carbon stocks, as they are more stable and resilient than degraded ecosystems. Ecosystems with a high degree of integrity prevent erosion, delivering good quality water and regulating water flow. They also have higher natural adaptive capacity in the face of climate change and deliver benefits including non-timber forest products that are critical for sustainable livelihoods. While it is important as a general matter to protect biodiversity and ecosystem services, we believe it is necessary to sharpen this focus in a post-2020 global biodiversity to recognize the unique and often irreplaceable values that ecosystems with a high degree of integrity provide.

* **Primary Forests:** primary forests perhaps best exemplify the links between biodiversity, ecosystem integrity and ecosystem services in a terrestrial context. Primary forests, compared to production, otherwise degraded and plantation forests, have the highest levels of biodiversity, the largest carbon stocks and provide the cleanest freshwater. They are therefore irreplaceable ecosystems and their protection should be an urgent and high priority given they continue to be under severe threat. Forests cover less than a third of the planet, less than 30% of the planet’s forests are protected, and less than 20% of primary forests are in protected areas. Their exceptional importance and the need to avoid their degradation and loss was clearly highlighted in CBD/COP14/L21. However, recognition of primary forests should be further enhanced in several respects to fully recognize their higher biodiversity and ecosystem service values:
	+ It is important to move away from assessment approaches that focus on net gain or loss of ‘forests’ that does not distinguish between different forest ecosystem types and conditions as this can and does result in loss of primary forests being seen as offset by regrowth in degraded forests or new plantations.
	+ We also note that primary forests are critical to ecosystem restoration efforts. Primary forests provide the seed bank, and the pollinators and seed dispersers, necessary for the natural regeneration of forests. In the tropics, for example, natural regeneration often occurs within a few hundred meters of a primary forest. Thus, primary forest conservation is essential to restoration efforts in fragmented landscapes – while restoration efforts help to buffer primary forests from edge effects and provide connectivity to other primary forest patches.
	+ A post-2020 global biodiversity framework must also recognize the extensive literature indicating while there is a range of mechanisms that are effective for protecting primary forests including protected areas, indigenous and community conservation initiatives, private protected areas, and payments for ecosystem services); industrial activity is not sustainable in primary forests.
* **Promoting holistic approaches**: It has long been apparent that environmental and social problems are closely intertwined. It is no longer sufficient to say that we need to solve both – it is important to recognize that they must all be solved *together*. Rights-based approaches are essential for sound conservation. By the same token, rights include the right to a healthy, functioning planet.