

Recommendations and Feedback on the Zero Draft

Prepared by the Campaign for Nature and the National Geographic Society

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Thank you for the opportunity to provide feedback on the zero draft of the post-2020 global biodiversity framework. We appreciate the scope of the biodiversity crisis that the world is facing and the need for a comprehensive plan that is ambitious, has measurable targets, and adequately addresses all of the pertinent and contributing factors to global biodiversity loss. Given the scale and complexity of the task at hand, the Campaign for Nature and the National Geographic Society believe that the zero draft marks a strong first step, provided that it is viewed as a floor and not the ceiling in terms of ambition.

While numerous parties will provide comprehensive feedback on the entirety of the zero draft and the draft monitoring framework, the Campaign for Nature and the National Geographic Society submit the following reactions and recommendations with a focus on several issues in particular. We are pleased that the zero draft proposes protecting at least 30 percent of the planet by 2030, but there are key qualitative aspects of Aichi Target 11 that are missing, and we believe that it is vital that the Kunming spatial target effectively builds upon and goes further than the existing target. Below are recommendations for how we think that can be done, in addition to feedback on the target regarding intact ecosystems, the priorities expressed by indigenous peoples and local communities, and resource mobilization.

Recommendations to strengthen Action Target 2

- *Keep the target's central element: protecting at least 30 percent of the world's land and sea by 2030.*

As the Campaign for Nature has indicated in [previous submissions](#), there is significant and growing scientific literature that indicates that 30 percent is the minimum amount of protected areas needed to help safeguard biodiversity and that it should be viewed as an interim goal on the way to protecting a significantly greater portion of the world's natural areas. It is critical that this percentage remain in the action target. Percentage area-based targets have been one of the few areas that have driven major progress from the Aichi targets, and the at least 30 percent target is a welcomed component of the draft post-2020 biodiversity framework.

- *Explicitly state the role and importance of indigenous peoples and local communities.* Given the central role that indigenous peoples and local communities must play in the establishment of protected areas, it is important to explicitly state that indigenous peoples must be full partners, that their rights must be fully respected, and that they must be given free, prior and informed consent in the creation of protected and conserved areas. While other sections of the draft (specifically Action Target 19) address the rights and involvement of indigenous people and local communities, we feel it is

important to expressly include language on the rights of IPLCs in the area-based conservation target. Many implementing agencies will focus on targets independently and not in the context of the full framework, therefore it is important to include clear language directly in the target.

- *Define what is meant by “areas important for biodiversity.”*

There are numerous qualitative measures that should be explicitly referenced to indicate what constitutes an important area for biodiversity, including ecologically intact areas, primary forests, sites specifically identified as “key biodiversity areas,” Ecologically or Biologically Significant Marine Areas (EBSAs), and other areas that provide important ecosystem services, including contributions towards relevant aspects of the UN climate goals and sustainable development goals. While the draft monitoring framework addresses some of these points through suggested indicators, it will be important to more directly and more clearly define what is meant by “areas important for biodiversity.”

- *Note the importance of management effectiveness.*

In order for protected areas to advance the goals of biodiversity conservation, it is imperative that they must be enforced, resourced, have effective plans and be effectively managed. “Paper parks” provide little benefit to biodiversity and it is essential that this target establishes a goal for designations that only considers and promotes those protected areas that are managed effectively to deliver long-term conservation outcomes. While we appreciate enabling conditions discussed later in the draft, we feel it is essential that management effectiveness be specifically included in the target itself.

- *Remove the 60 percent figure.*

The intention of adding another metric to ensure that protected areas are focused on those places that matter most to biodiversity is commendable. However, we are concerned that the inclusion of this figure is confusing and would be hard to measure, and we believe that the goal behind it can be better accomplished by explicitly stating that important biodiversity areas must be prioritized and then clarifying what is meant by that term.

- *Remove the 10 percent figure.*

We do not believe it is helpful, in terms of both clarity and substance, to introduce figures for “strict” protection into this target. It is not clear what “strict” means, and the additional focus on 10 percent throws into question what level of protection we are expecting for the 30 percent in relation to the 10 percent. We believe that the target would be stronger by removing this 10 percent figure altogether and instead adding qualitative language to the target to help ensure that all protected areas and OECMs deliver meaningful, long-term conservation outcomes.

- *Don’t try to fit it all into one sentence.*

While we appreciate the desire to draft short, concise targets that can fit in one sentence, we are concerned that the attempt to do so creates confusion and misunderstanding, either through confusing language and syntax or by leaving out critically important details. We recognize that many governments, land managers, stakeholders and more will view targets individually as opposed to reading the entire document, and thus could miss important details if key issues are discussed solely in sections like the enabling conditions and not in the targets themselves. Because issues such as management effectiveness and equity and rights of IPLCs were included in Aichi target 11, not including those concepts directly in the target in the zero draft reads like they are no longer essential components of the target, even though they should be. For these reasons, we think that it is critical to draft more robust targets, including for Action Target 2.

Recommendations to strengthen Action Target 1

- *More clearly separate and clarify the three elements of this target.*

It appears that there are three elements to this target: 1) ensuring that at least 50 percent of the world's land and sea are under comprehensive spatial planning; 2) restoring freshwater, marine, and terrestrial ecosystems so that there is a net increase in the world's natural areas by 2030 as well as improvements in ecological connectivity and integrity; and 3) preserving all of the world's existing intact areas and wilderness. Given how the target is written, there is some ambiguity and potential for confusion, and we recommend separating and clarifying each of these important components of the target.
- *Keep the provision regarding retaining existing intact areas and wilderness.*

In particular, we would like to underscore the importance of this element of the target. Stopping, in its entirety, the destruction, conversion, or development of existing intact areas and wilderness is a strong, ambitious, and scientifically backed proposal that should remain in the draft. This deserves to be a specific target on its own. This proposal effectively complements the protected area proposal in Action Target 2, as it directs action and consideration to additional natural areas that might not be designated or managed for conservation but that are nevertheless critical for biodiversity and should remain in a natural state.
- *Strengthen the goal for spatial planning.*

While it may not be feasible to ensure that 100 percent of the planet is under comprehensive spatial planning, 50 percent is not sufficiently ambitious. This number should be increased, and there should be more details about the requirements and benefits of spatial planning, including the need to integrate planning across landscapes. Specifically, spatial planning should be used, at least in part, to better document and identify key biodiversity areas and to inform decisions that nations and other actors take in order to minimize impacts to the planet's most important ecological areas and to safeguard ecological services. Additionally, we believe that this focus on improved

planning is critical but that it is more of a tool to achieve desired outcomes than the end itself. As a result, we would recommend moving it to the “Tools and Solutions” section.

More clearly incorporating priorities of indigenous peoples and local communities

- *Better integrate IPLC priorities across all aspects of the post-2020 framework.*
The Campaign for Nature is concerned that the zero draft does not more fully integrate the priorities of indigenous peoples and local communities (IPLCs). The International Indigenous Forum on Biodiversity has explicitly requested that IPLC priorities be included in all aspects of the post-2020 framework and encourages the parties to be more responsive to their request.
- *Establish a stronger goal to advance IPLC priorities.*
Of the five long-term goals for 2030 and 2050, not one explicitly or comprehensively addresses the priorities of indigenous peoples and local communities. The Campaign for Nature recommends that parties, the co-chairs of the Open Ended Working Group, and the Secretariat work collaboratively with IPLCs to develop a goal that more explicitly reflects their priorities, the importance of upholding their rights, and their long-term vision.

Developing figures for financial resource mobilization

- *Create specific resource mobilization figures corresponding to individual targets.*
We recognize the challenges of developing financial figures for every target, however, it should be done wherever it is possible. Specific figures to illustrate what will be needed to achieve specific targets will be more useful in educating the public and motivating funders (whether it's governmental, corporate, or philanthropic funders) than a huge number intended to cover every aspect of the post-2020 framework. We recommend taking this approach of focusing on what is ultimately needed as opposed to aiming for a percentage increase in financial resources, which could represent progress compared to the status quo but still fall short of achieving desired outcomes.
- *Indicate where the financial resources could come from.*
Currently, the zero draft notes that there must be an “increase from all sources.” When the resource mobilization targets are more fully developed, we believe that it would be helpful if the specific sources were identified and if there were more details given about which sources are best positioned and expected to be mobilized for each target. For example, we believe that the most significant long-term resources for protected and conserved areas should come from government-enacted regulations or policies and that it would be important to specify out. Additionally, in the near term, we believe that philanthropy and corporate giving have a role to play, but that the largest increases should be expected to come from government budgets.

Additional feedback on Zero Draft

- *Write each target so that it can stand on its own, if and as needed.*

As noted above in the section regarding Action Target 2, we believe that many government officials, stakeholders, press, and members of the public will review individual targets without appreciation of the full context or having read the entire post-2020 framework. While we agree that each target should be as clear and concise as possible, we believe that each would benefit from more content and detail than is currently provided in the zero draft. Additionally, we believe that each action target needs to very clearly define its desired outcomes.

- *Continue to stress the role that nature can play in fighting climate change.*
We are strongly supportive of more clearly and regularly demonstrating how nature-based solutions can and must play a greater role in fighting climate change than is currently the case. As a result, we are supportive of the goal stating that nature should contribute “At least [30%] of efforts to achieve the targets of the Paris Agreement in 2030 and 2050.” In addition, we believe that the resource mobilization target should state that at least 30% of climate finance should be put toward nature-based solutions that simultaneously help maintain biodiversity.

- *Provide a greater focus on the ocean.*
We believe that there needs to be a greater focus on the ocean, both in terms of documenting the problem that the post-2020 framework is addressing and articulating desired conservation outcomes. For the former, we are concerned that trends in the ocean regarding biodiversity loss are not specifically addressed in the background section. Given recent reports and trends regarding ocean deoxygenation, warming, and acidification, the starting position for biodiversity is likely worse than what the zero draft indicates, particularly as it relates to the ocean. Because of this discrepancy, greater ambition in goals and targets may be necessary. We also believe there should be more specific consideration given to the ocean in the zero draft’s goals and targets, not merely in terms of using more inclusive and consistent terminology, but in detailing desired outcomes specific to the unique challenges and opportunities of the ocean.

Feedback on Draft Monitoring Framework - Draft 2030 Target 2

- *Define “protected areas”*
It is critically important to define “protected areas,” given the wide range of management structures and permissible activities in the six IUCN protected area categories. There has been some scientific skepticism expressed about the effectiveness of IUCN category V and VI given their potentially conflicting focus on biodiversity conservation and economic activity, and many scientists have noted that marine protected areas deliver durable conservation outcomes only when they are entirely free of economic activity. We believe that any “protected area” contributing to the spatial target must deliver long-term conservation outcomes, which means that it will be essential for parties to determine as soon as possible an appropriate definition of “protected area” that is informed by the best available science and is sensitive to the variety of conditions on the ground in regions around the world.

- *Add suggested indicators*

The indicators should include “Indigenous and Community Conserved Areas (ICCAs) coverage” to correspond to “change in extent of protected areas and other area-based conservation measures”, “Ecologically or Biologically Significant Marine Areas (EBSAs)” to correspond to “coverage and representativity,” and “financial resources available” to correspond to “protected area management.”

- *Provide additional guidance on implementation*

We believe that there are important details that need to be provided in any additional guidance on implementation that is developed. In particular, it is important to clarify that the spatial target is a global target and not one that all countries will be expected or able to meet. There was some ambiguity on this question with Aichi Target 11, so it will be important to clarify the intention this time. Assuming that the spatial target is clarified as a global target, we believe that [“the Three Global Conditions for Biodiversity Conservation and Restoration Framework”](#) provides a scientifically compelling and appropriate framework to guide countries through the potentially difficult questions of what responsibilities they ought to assume. We think that the CBD should formally recognize and adopt this framework when it issues more detailed guidance on implementation of the spatial target and detail how parties can use the framework to designate and manage terrestrial and marine conservation areas as part of their National Biodiversity Strategies and Action Plans.