**Review of the document on the indicators for the draft goals and targets of the post-2020 global biodiversity framework**

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| **Disclaimer**The comments provided by Eurostat/ European Commission on the draft monitoring framework and supporting information documents do neither represent nor prejudge the EU positions on goals, targets and indicators that will be expressed at at the third meeting of the open-ended working group and by no means, indicate any agreement on what is currently included in the draft monitoring framework.” |

This document contains the comments by Eurostat the statistical office of the European Union in reply to the invitation letter that Stefan Schweinfest, Director of UNSD, sent on 7 July 2020 to all statistical organisations globally to participate in the consultation.

The comments provided here are therefore purely from a statistical, technical perspective and complement the comments by the Directorate General Environment of the European Commission that coordinated the reply from the EU.

**COMMENTS**

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| **Review comments on the indicators for the draft goals and targets of the post-2020 global biodiversity framework** |
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| **General Comments** |
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|  | **Limit the size of the indicator set**The document presents a good overview of the most important issues and choices to be made when designing an operational global indicator framework. The criteria for selecting the indicators are plausible and the discussion of the current draft considers all relevant aspects. It will be now important that the criteria are strictly applied to select the indicators so that the final set is not too large, well balanced across targets and goals, operational and with sufficiently long time series from the outset. Learning from the issues of the SDG indicator set will be important in that regard. |
|  | **Focus development of missing indicators**For many monitoring elements there is currently no candidate indicator. Developing a new, operational indicator is costly. It is therefore vital that the development of new indicators is concentrated on a very limited number of them, to avoid dispersion of efforts and consequently slow progress. |
|  | **Contribution from statistics to development and operation**Eurostat believes that strongly involving statistical offices in the design of the indicator set is vital due to the many interlinkages with the SDG indicators and with other socio-economic statistics. Many of the suggested indicators are typically not provided by statistical offices but statistical offices can provide valuable expertise on designing and maintaining operational and high quality indicator sets thereby integrating a wide array of data from different sources. Statistical offices also have vast experience with the documentation of methodologies and data sources.Engaging statistical offices via UNSD is vital and in the EU Eurostat will work together with national statistical offices from EU Member States and encourage them to engage with the authorities responsible for nature protection. To support cooperation within countries between statistical offices and nature protection authorities it could be useful if CBD maintains a public register of national focal points for this CBD framework. |
|  | **Objective, criteria based selection process for indicators**CBD may design an assessment tool for the proposed indicators with a scoring approach taking into account technical and relevance considerations such as policy relevance for international conventions and agreements, reuse of existing indicators, length and freshness of time series, geographical coverage, use of standards and agreed methodologies, available documentation, re-use in other international frameworks, and other aspects. Only indicators that reach a certain score should be retained, while others that are desirable might be put on hold until they score better than existing ones. Eurostat believes that is very important to set an upper limit of indicators in total and per goal/target to make sure that the set remains manageable and only the ‘best’ indicators survive.A regular e.g. five yearly review process should be established that would allow the inclusion of new indicators (replacing existing ones) when they reach the necessary quality. |
|  | **Scalability is key**Eurostat agrees that priority should be given to indicators that can be easily scaled up or down from sub-national to global scale without methodological issues. This helps to make indicators more relevant and comparable for the various levels of political action and avoids double reporting streams and burden on agencies producing the indicators. |
|  | **Produce once – reuse many**Eurostat also strongly agrees that indicators or even complete indicator sets should be re-used to the extent possible that are already available from other international agreements, conventions and statistics, including the SDG indicators. Re-used indicators should ideally adopt international standards and methodologies to ensure comparability across conventions etc.  |
|  | **Indicators from official sources**Preference should be given to indicators that are produced by official, recognised national or international institutions with strong mandates. This will increase the trustworthiness and ensure long-term maintenance of the indicators. |
|  | The presentation of information on data maintenance characteristics in columns 5, 6, 7, and 8 could be made more clear:* First, information on the actual time series and frequency is often missing in the respective column (column 8). This information is crucial for the assessment of the usefulness of the indicator.
* Second, “year of last update” (column 7) is in some cases a later year than the last year of the time series which is a bit confusing. On this we propose to delete column 7 altogether and instead properly and completely fill in information about the length of the existing time series (i.e. data available today) and frequency in column 8. From this information, the availability of the latest/ upcoming data point could then be deduced.
* Third, on the other hand, it may be useful to record information on the length of the data series on the one hand and frequency of updates on the other hand in separate columns.
* Last, in some cases, column 6 (“Date of availability for indicator in development (Year)”) is filled with a date for indicators that already exist according, to column 5 (“Available today (X) or under active development (Y)”) – information needs to be made consistent. Deleting column 6 altogether and using column 5 to inform about both 1) whether indicator is available and 2) if not available at this stage when it is likely to be available, might be part of the solution.
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| 3 | Section 2.1. It would be good to add some considerations on the intended size of the monitoring framework, e.g. the maximum number of indicators and the number of indicators per target and goal. |
| 5 | Section 2.4. The alignment with existing monitoring frameworks is an important aspect. However, the example of custodian agencies of the SDGs is a bit misleading as still today there is a larger number of indicators where there is no operational underlying data. |
| 5 | Section 2.5. Eurostat welcomes the development of a limited set of headline indicators (e.g. one per goal and target). These indicators could be produced more frequently and both for the national and global level. |
| 8 | Section 4.1. Looking at the distribution in table 1 a better balance between goals as regards monitoring elements and indicators should be achieved, to demonstrate that all goals are equally important. This means that indicators and elements under goal A should be reduced to make room for indicators under goal B to D while at the same time not exceeding a reasonable total amount of indicators. Per monitoring element, one indicator should be available. |
| 9 | Section 4.2. The number of 162 monitoring elements for the 20 targets appears very high as each of those elements would require an indicator, resulting in a very large indicator set. Eurostat therefore suggests reviewing the monitoring elements and reducing their number as much as possible. |
| 11 | Section 4.6. 1st para: Natural Capital Accounting adopting the SEEA-EEA standard might be a means to produce indicators that measure ‘*nature’s contributions to people*’. Developing indicators using SEEA-EEA would also allow easily linking indicators to other socio-economic statistics and indicators, and national accounts and supporting the valuation of biodiversity. |