

## TEMPLATE FOR COMMENTS

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework				
<i>Contact information</i>				
Surname:		OSAWA		
Given Name:		Takafumi		
Government (if applicable):		Ministry of Foreign Affairs		
Organization:		-		
Address:		2-2-1, Kasumigaseki, Chiyoda-ku		
City:		Tokyo		
Country:		Japan		
E-mail:		takafumi.osawa@mofa.go.jp		
<i>Comments</i>				
Table	Page	Column letter	Row number	Comment
General comment				<p>There are many indicators proposed, but we are unsure whether all of them can be sustained. Several indicators seem to overlap. We should reduce the number of indicators so that we have a few important, specific and commonly measurable indicators for the long term. As a way of example, below, we provide a few examples which could be removed from the indicator list.</p> <p>Because there are inevitable overlaps between Goals indicators and Target indicators, it will be clearer and easier for use if their linkages are clearly explained. Similarly, it will be useful to indicate if an indicator of a monitoring element is also used for other monitoring elements. By doing so, the framework will look better articulated and can reduce redundancies.</p> <p>Although the number of indicators which can be monitored through NBSAPs or National Reports (NRs) are limited, we should, originally, focus on the indicators that can be monitored</p>

				<p>through NRs under the CBD.</p> <p>If you could provide scientific evidence/rationale of each numerical goal/target and why you chose the goal/targets among others in writing, such information can be helpful for our further consideration about monitoring elements, indicators and baselines.</p> <p>There are some inconsistencies between the tables of “draft monitoring framework for the post-2020 global biodiversity framework for review” and those of “indicators for the post-2020 global biodiversity framework”. For example, according to the former tables, two indicators are suggested for “trends in access to genetic resources” of Goal C (Row 72-73). In contrast, according to the latter tables, indicators of the same “trends in access to genetic resources” are “to be determined”. Hence, such inconsistencies should be standardized for coherency.</p> <p>Components of the 2030 targets should be written in line with each corresponding target. For example, T1.1 and T1.3-1.5 are obviously included in Target 1, while T1.2 is not explicitly included (T1.2 uses the concept of “fragmentation” while Target 1 uses the concept of “connectivity”, and hence they are similar but not same). Thus, in such cases, either the target or the component(s) should be rewritten to make them more consistent with each other. Ideally, the components should be written by dividing each corresponding target with minimal modifications. Otherwise, we might have to take time to get agreement on wording of both the targets and components individually even though they are very similar.</p> <p>Although period of availability of baseline data in column D is greatly varied among indicators, it should be also clarified which period is assumed as the baseline of the specific numerical targets in percentage of 2030 Milestones.</p>
1	2	B	1-4	In many developed countries, including Japan and across Europe, land

				abandonment is occurring at a rate roughly matching that of habitat transformation in the tropics. This has implications for traditional livelihoods as well as the semi-natural ecosystems that have co-existed alongside small-scale agriculture for up to thousands of years. So trend in land abandonment should be included as a monitoring element.
1	3	A	34, 35	In order to review the proposed indicators, the definition of “health of species” needs to be clarified.
1	4	C	46	“OECM” should be included in the indicator in Row 46 as follows: “Protected Area and OECMs Coverage of Key Biodiversity Areas.”
1	5	C	51, 56, 58	Although number of certified forest areas is used as indicators in Goal B, sub-indicator 4 of SDG15.2.1 “proportion of forests under a long-term management plan” may be better to assess the goal progress to assure sustainable use of forests in future taking into account that forests which are not under a certification scheme also provide benefits to people as well.
1	5 and others	D	59 and others (overall)	Throughout the table, there are some indicators which seem to be strongly affected by non-biodiversity factors. For instance, good ambient water quality (in Row 59) and deaths/missing of people (in Row 62) can be changed depending on water management, disaster measures and/or disaster frequencies. Hence, such indicators should be removed from the list.
1	6	C	66	According to the ITTO, areas of forest under certification (especially in the tropics) will be a small subset of forests that are or can be sustainably managed; and that that indicator does not inform “trends in the certification of supply chains”: For that, you need chain of custody certification of forest products to be able to show that all the wood that goes into a forest product came from certified forests. Finally, the volume of certified forest products in trade is much more relevant to sustainability than the area of certified forests. As such, in addition to certification, we suggest including measures that can track actual market trends (e.g. %/volume trends in share of legally harvested

				(sustainably managed) wood, etc which are more indicative of sustainability issues either at the forest or the market level); These can easily be derived from organizations that the CBD has MoUs with, like the ITTO.
1	6	B	68	“Trends in ecotourism with sustainability certificates and/or environmental management system” can be considered here.
1	6	C	74-76	<p>What ABS should aim for is not just increasing the amount of benefits shared from utilization of genetic resources but maximizing contributions of the shared benefits to conservation and sustainable use of biodiversity. As embedded in Target 12, Goal C should reflect the concept of the conservation and sustainable use of biodiversity.</p> <p>In this regard, C2 should be replaced by “Sharing of the benefits for the conservation and sustainable use of biodiversity”. The indicator in Row 149 on Page 24 should then be included in the indicators of Goal C as well.</p> <p>Furthermore, it is not possible to collect information on benefit sharing from the use of genetic resources. Since benefit-sharing is supposed to be based on a contract of mutually agreed terms, the amount of benefits shared is basically confidential information. As an alternative, we suggest monitoring the proportion of benefits shared that have been actually used for conservation and leading to sustainable uses of biodiversity – rather than on increases in the quantity of benefits itself (in addition, there is the risk of intangible/non-monetary benefits being undercounted). From this stand point, we recommend revising the monitoring element B to “Trends in the contribution of benefits resulting from use of traditional knowledge associated with genetic resources to conservation and sustainable use of biodiversity”.</p>
1	6	B	76	We request deletion of the component in Row 76. This is because this component is similar to that in Row 74, apart from the addition of “monetary and non-monetary”.

				In addition to simplicity, this deletion is also to avoid fruitless debate on the balance between non-monetary and monetary benefit sharing, which can result in a lack of consensus, as seen in other related forums on the matter. We note that this would also be consistent with Table 2, B, Row 146.
1	6	A	77-85	Add the follows as new Component of the 2050 Goal D; D4 Mainstreaming of Biodiversity in every stakeholder
1	6	B	77-85	Add the follows as new Monitoring Elements of upper Component of the 2050 Goal D; Trends in Biodiversity Friendly activities in every stakeholder such as governments, local governments, business sectors, and citizens
1	6	C	77-85	Add the follows as new Indicator of upper Monitoring Elements; <ul style="list-style-type: none"> <li>• Number or proportion of governments, local governments, business sectors and citizens those are taking Biodiversity Friendly activities sustainably</li> <li>• Impact on Biodiversity (Foot print or LIME3 etc.) of each stakeholders</li> </ul>
2	8	ABC	1–3	Landscape-scale spatial planning should be included in T1.1 to align with the expression of IPBES global assessment as follow, T1.1. Increase in area of terrestrial, freshwater and marine ecosystems under landscape-scale spatial planning  Add “Trend in area applied landscape approaches” as a new monitoring element,  Add the follows as new indicators of the new monitoring element; <ul style="list-style-type: none"> <li>-Number of countries applying landscape approaches to NBSAPs</li> <li>-Number of countries implementing measures on landscape approaches at national level</li> </ul> An example of definition for landscape approach; “A landscape approach is broadly defined as a long-term process where diverse stakeholders collaborate to achieve a balance between multiple

				objectives on a landscape or seascape scale” (Sayer et al. 2013, 2017).
2	9	C	22	The rate of land use change could be observed more accurately through the net annual change rate than proportion of total land area. Respecting that conversion to agricultural land is pointed out as a major factor of deforestation, the indicator “Forest Area as proportion of total land area (SDG indicator 15.1.1)” in Row 22, target T1.2, table 2 should be replaced by “Forest area net change rate (Sub-indicator 1, SDG indicator 15.2.1)” which is gathered by FAO.
2	11-12	A	43-52	T2.3 and T2.7 are not explicitly included in Target 2. Therefore, Target 2 could be rewritten by including the two components. T2.4 and T2.6 are also about “effective system”, which is mentioned in Target 2.
2	12	BC	52	Landscape-scale spatial planning should be included in T2.7-B as follows; T2.7-B “Policy and governance practices including spatial planning such as landscape approaches outside of protected areas and OECMs compatible with their management objectives”  Add the follows as new indicators of abovementioned monitoring element; -Number of countries applying landscape approaches to NBSAPs -Number of countries implementing measures on landscape approaches at national level
2	12	C	55	Even though there is no indicator that is formally used or to be developed, “a management plan of the targeted wildlife in each country” could be the indicator.
2	12	B	56	The monitoring element should be “Trends in biological resources harvested illegally” if this indicator is to be used here.
2	13	B	61	The monitoring element should be “Trends in biological resources traded illegally” if this indicator is to be used here.
2	13	C	60	Even though there is no indicator that is formally used or to be developed, “a guideline for hygienic management or infection prevention” could be the indicator.
2	13	C	63	
2	13	A	64~66	T4.3 is not necessary since whether the

				use of wild species is sustainable or not is measured by T4.1 and T4.2
2	14	A	67-69	It is effective to divide this component into two parts; one is for the intentional IAS that can be addressed by national legislation, and the other is for the unintentional IAS that require international cooperation
2	14	C	67	As mentioned above, unintentional IAS should be considered apart from intentional IAS. Moreover, in order to tackle this issue, it is effective to set an intergovernmental information-sharing system and collaborate with other quarantine frameworks. Therefore, the progress of such measures could be the indicator for unintentional IAS. For example, "Number of countries that have established notification schemes for introduction of IAS" can be considered as an additional indicator.
2	14	C	68 and 75	We are not sure how to evaluate whether resource is adequate or not. Besides, such an issue (adequate resourcing) can be considered in the context of not only IAS but also other targets. Hence, we are not sure why this issue is included in the indicators in only Rows 68 and 75, among others.
2	14	C	69	This indicator should be set out in Row 67
2	14	B	70	"Trends and efficiency" should be revised as "Trends in efficiency"
2	14	B	72	"Trends in monitoring..." would be correct
2	15	BC	81~96	Although Target 6 mentions the reduction of pollution from all "sources", the indicators only cover the "trends in the level of pollution". Hence, the target needs to be revised in a consistent manner.
2	16	C	96	The indicator is "Hazardous waste generated per capita" but it is better to use "Hazardous waste amount" since it is better to reflect the impact.
2	17	C	101	Having NDCs etc. alone does not necessarily ensure that these plans integrate biodiversity. We need to make sure that these plans integrate biodiversity so that they contribute to minimize negative impacts on biodiversity.
2	18	C	108	Nine certification schemes including Alaska RFM, IRF, MSC, G.U.L.F, and MEL have been recognized by GSSI

				(Global Sustainable Seafood Initiative) based on “The FAO Code of Conduct for Responsible Fisheries” etc., and great efforts to promote sustainable seafood have been progressing globally. Against this international trend, the indicator which only focuses on MSC certification is insufficient. Therefore, other certification schemes recognized by GSSI should be included.
2	19	C	114-116	We propose to copy and paste the indicators in Row 125 and 126 here again since the components of Target 8 seem to be weighted in fisheries too much.
2	20	BC	117 119 —	Add the follows as a new indicator; -Areas of agricultural land applied landscape approaches  An example of definition for landscape approach; “A landscape approach is broadly defined as a long-term process where diverse stakeholders collaborate to achieve a balance between multiple objectives on a landscape or seascape scale” (Sayer et al. 2013, 2017).
2	22	C	140-141	While there is a lot of focus on benefit sharing, insufficient focus is paid on the issue of improving access to, and provision of, genetic materials to enhance conservation efforts.  With regard to ITPGRFA, for example, access is also driven by the availability of, as well as the number of access provided to material within the Multilateral System (MLS); We think that such a concept of improved availability of PGRFA should be included in the indicators. i.e., “how many countries have taken measures to improve availability of plant genetic resources (PGRFA) in the MLS, to provide facilitated access to Annex I PGRFA and have used the SMTA to provide access to Annex I PGRFA. And how many countries have, or are in the process of improving the national legislation, regulations or procedures to do so.” These questions were addressed in the most recent ITPGRFA compliance report, and could be easily operationalized every 2 years.

				We also note that this addition provides more balance vis-à-vis indicators on benefit sharing, which also ask about the number of countries improving legislative measures toward that end.
2	24	A	146-149	We suggest adding “for the conservation and sustainable use of biodiversity” in T12.2 at the end of the sentence for consistency with Target 12 and the monitoring element (indicator in Row 149.). Furthermore, it is essential to promote benefit-sharing, not to increase quantity of benefits itself. Hence, T12.2 should be revised by “Benefit sharing from the use of genetic resources for the conservation and sustainable use of biodiversity”.
2	24	B	146-148	The monitoring element of “Trends in the number of countries that have adopted legislative, administrative or policy frameworks to ensure fair and equitable sharing of benefits” in Row 147-148 is too long, and it should be replaced by “Trends in fair and equitable sharing of benefits” (c.f., a similar writing was already made for Row 140-145). Besides, the replaced monitoring element can cover even Row 146, and hence please merge the monitoring elements of Rows 146-148 into one.
2	25	A	151	It is not possible to collect necessary information to monitor benefit shared from the use of genetic resources. Because benefit-sharing is supposed to be upon mutually agreed terms individually, which means quantity of benefits is basically confidential. Furthermore, it is essential to promote benefit-sharing for conservation and sustainable use of biodiversity, not to increase quantity of benefits itself. Therefore, the monitoring element B should be revised by “Trends in the contribution of benefits resulting from use of traditional knowledge associated with genetic resources to conservation and sustainable use of biodiversity.”
2	26	A	152-156	Add the follows as new Monitoring Elements B; Trends in integration of biodiversity and ecosystem service value into products , services and solutions
2	26	B	152-156	Add the follows as new Indicator of upper Monitoring Elements; Number or proportion of products,

				services and solution considering or contributing to conservation of biodiversity and ecosystem service (Ex. sales amount ratio or sales volume ratio)
2	26	A	152-156	Add the follows as new Monitoring Elements; Trends in integration of biodiversity and ecosystem service value into cooperate management system of national level, local government level, and private sector level..
2	26	C	156	Add the follows as new Indicator of upper Monitoring Elements; Number or proportion of countries, local governments and private companies integrating biodiversity and ecosystem service value into the policy and action plans of environmental management system (such as ISO 14001 etc.) or Commitments relating to determinations and concrete actions
2	26	C	157	“National targets that have been established in accordance with post-2020 Global Biodiversity Framework” should also be added here.
2	26	A	157-158	Add the follows as new Monitoring Elements; Trends in integration of biodiversity and ecosystem service value into environmental accounts etc. of countries, local governments and private sectors.
2	27	C	162	Ecological Footprint is useful as indicator for evaluate impact on biodiversity. But Ecological Footprint includes Carbon Footprint in it. As Indicator for impacts on biodiversity, we should use the values deducted the Carbon Footprint. On the other hand, Carbon Footprint is significant factor of climate change. We should monitor the footprint on Biodiversity and Carbon footprint, respectively.
2	27	A	162-166	Add the follows as new Monitoring Elements B in A.T14.1; Trends in the reduction of negative impact on biodiversity of countries, local governments and private sectors through supply chain and value chain
2	27	B	162-166	Add the follows as new Indicator of upper B, Trends in the reduction of negative impact on biodiversity of private sector through supply chain and value chain;

				LIME3 (Life cycle Impact assessment Method based on Endpoint modeling) <a href="http://lca-forum.org/english/lime/">http://lca-forum.org/english/lime/</a>  Evaluate EINES (Expected Increase in Number of Extinct Species) and NPP Loss (Net Primary Production Loss) calculated by LIME
2	27	A	162-166	[50%] in T14.1 should be reviewed continuously.
2	28	C	169-170	Material Footprint and Domestic material consumption are set as the indicators. However, Material Footprint and Domestic material consumption themselves are not converted to the negative impacts on biodiversity. We should rather use the Ecological Footprint and other indicators which are calculated by taking into account the factors of biodiversity.
2	29-30	C	174 and 179	Nine certification schemes including Alaska RFM, IRF, MSC, G.U.L.F, and MEL have been recognized by GSSI (Global Sustainable Seafood Initiative) based on "The FAO Code of Conduct for Responsible Fisheries" etc., and great efforts to promote sustainable seafood have been progressing globally. Against this international trend, the indicator which only focuses on MSC certification is insufficient. Therefore, other certification schemes recognized by GSSI should be included.
2	28	C	177 (also 172, etc)	We think that the cited certification schemes (FSC, PEFC) are insufficient in capturing the amount of certification that exists in the market. As such, we recommend adding the indicator of "the number of countries that have introduced forest-product certification schemes, so that the indicator also captures national certification schemes (which also align with the global ones)" or "total forest management certification that <i>includes</i> FSC and PEFC" (implying that this includes also national certification schemes).  Furthermore, we want to point out that, areas of forest under certification (especially in the tropics) will be a small subset of forests that are or can be sustainably managed. Furthermore, that indicator does not inform "trends in the certification of supply chains": for

				that, you need chain of custody certification of forest products to be able to show that all the wood that goes into a forest product came from certified forests. Finally, the volume of certified forest products in trade is much more relevant to sustainability than the area of certified forests. As such, in addition to certification, we suggest including measures that can track actual market trends (e.g. %/volume trends in share of legally harvested (sustainably managed) wood, etc which are more indicative of sustainability issues either at the forest or the market level); These can easily be derived from organizations that CBD has MoUs with, like the ITTO.
2	30	A	180-189	Add the follows as new Monitoring Elements B in A.T15.1; Trends in the proportion of products and services with eco-label considering or contributing to biodiversity of private sectors
2	31	A	180-189	Add the follows as new Monitoring Elements B in A.T15.1; Trends in the proportion of purchasing products and services with eco-label considering or contributing to biodiversity
2	32	A	194-197	"Biotechnology" should be replaced for "modern biotechnology" which is defined in the Cartagena Protocol, as we intend to address Target16 within the Protocol.
2	32	C	196	
2	32	A	198-200	
2	32	C	198	
2	33	A	201-202	
2	33	B	201-202	
2	33 and 34	A	205-210	T17.1 is not explicitly included in Target 17, while wording of T17.2 is somewhat different from Target 17. To make them consistent mutually and also to delete "the most", T17.2 should be rewritten as "redirection, repurpose, reform or elimination of incentives and subsidies harmful to biodiversity". We are not supposed to give comments on the target wording this time, though we would like the target to be rewritten in accordance with the abovementioned idea.
2	33	D	205-207	Just the number of countries is written here as the indicators of Target 17.1, but we wonder if more adequate and precise indicators, such as total amount (surplus) of biodiversity-relevant taxes, charges and fees, for example, in relation to Gross National Income (GNI) or total tax income are available here. If

				each party can report such data, we could conduct such precise assessments.
2	33-34	B,C	208	With regards to reforming incentives, indicators should be more biodiversity-relevant ones, rather than the one that merely represents monetary amount of support. Producer support estimate, for example, includes only 54 countries which counts less than one-third of the parties, only their aggregated data exists as indicated in CBD/SBSTTA/23/INF/3, and definitions and breakdowns are not disclosed. Moreover, it lacks common understandings of what “potentially environmentally harmful” implies, and the responsible institution itself articulates that “neither total PSE nor its composition....can be interpreted as indicating the actual impact of policy,” and “whether they actually are harmful depends on a host of other factors”(OECD, 2013). In this respect, such a non-practical indicator should not be employed here.
2	34-36	A-C	211-225	<p>Enhancing the efficiency/effectiveness of the uptake/use of resources should be added as another component of Target 18: According to the expert panel, it is important to redirect/reduce resources that are harmful to biodiversity and enhancing the efficiency/effectiveness of the uptake/use of resources as main components (c.f., CBD/SBI/3/INF/2), rather than focusing on generating additional resources to fill a funding gap. This is particularly relevant in a financially-constrained environment that we are likely to be in following the pandemic crisis.</p> <p>Target 18 is looking at increase by [X%] financial resources from all international and domestic sources. In contrast, although the proposed indicators of international resource mobilization can measure actual resource flow quantitatively, those of domestic resource mobilization are focusing on just country number, but not actual resource flow. Taking into account measurability, the indicator in Row 219 (Number of Parties...) should be replaced by “Amount of domestic financial resources mobilized from</p>

				public sector” at an initial stage of implementation of the post-2020 GBF.
2	35	C	213-214	We do not think these indicators should be employed here, as they are not focused on biodiversity, but rather on broader issues of capacity building and assistance.
2	35	C	215	We suggest including the amount of funding provided in the GEF multi-focal programs (Impact Programs under GEF-7), instead of limiting to the Biodiversity focal area. These programs are quite large in scope and size, and under GEF-7, most of these Impact Programs had a disproportionately high share of focusing on biodiversity. Omitting contributions into these very large global programs would therefore significantly undervalue GEF's financing into biodiversity-related areas (such as sustainable forest management, Sustainable Cities, FULOR),
2	36-38	A	226-238	We suggest separating Target 19 into T19.1-19.4. This is because the current T19.4 is picking up and combining “traditional knowledge”, which is in the beginning of Target, and “research”, which is at the end of the target. If T 19.4 focuses on traditional knowledge, the element of research (including the indicator in Row 236) should be moved to T 19.1 with its indicators.
2	37	B	234-235	Revise the Indicator of Trends in the integration of biodiversity into academic curricula of T19.3 as follows: Education for sustainable development are mainstreamed in (a) national education policies; (b) curricula; (c) teacher education; and (d) student assessment (SDG indicators 4.71and 12.8.1) and management education and employee education of private companies
2	39	C	243-245	As aforementioned, these indicators are important and relevant to broad societal trends rather than biodiversity issues. Thus, we are not sure if these indicators are fitting here.