



United States Department of State

*Bureau of Oceans and International
Environmental and Scientific Affairs
Washington, D.C. 20520*

7 August 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:

The United States 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). Please replace the submission we made on 24 July with the one attached as we have incorporated some additional comments in this version.

We are pleased to have the opportunity to share the attached information, and thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Barbara M. De Rosa-Joynt".

Barbara M. De Rosa-Joynt
Division Chief for Biodiversity
U.S. National Focal Point for the
Convention on Biological Diversity

Attachment: U.S. comments on the draft monitoring framework for the post-2020 global biodiversity framework.

PEER REVIEW COMMENTS

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework				
<i>Contact information</i>				
Surname:	Revere			
Given Name:	Robert			
Government (if applicable):	United States of America			
Organization:	U.S. Department of State			
Address:	2201 C Street, NW			
City:	Washington, DC			
Country:	U.S.A.			
E-mail:	RevereRB@state.gov			
<i>General Comments</i>				
<p>Overall we consider that the document is comprehensive, but have some concerns about the language used in some of these targets, which is broad and non-specific. We also have concerns about the large number of monitoring elements and indicators, many of which we believe can usefully be collapsed. Some of the monitoring elements and indicators appear redundant, and we have noted specific examples below.</p> <p>We note and recognize that reporting across countries may be difficult to standardize. We consider that the suggestion proposed in the “Indicators for the Post-2020 Global Diversity Framework” document that Parties agree on a small list of “headline” indicators that all Parties would be asked to report be a very practical approach in this regard.</p> <p>While we acknowledge that the text of the goals and targets are not being reviewed at this time, we note that it is difficult to recommend an appropriate indicator due to how broad and general the goals are. For instance, for Target 4’s “trade and use of wild species, is legal and at sustainable levels,” it is unclear whose laws are being used to define legality.</p> <p>Finally, we have concerns about how baselines for each indicator are established. We believe it would be important to be very clear whether different regions will have different baselines.</p>				
<i>Specific Comments</i>				
Table	Page	Column letter	Row number	Comment
1	2	A	1, 15	We would suggest changing ‘freshwater,’ to ‘inland water’ be inclusive of soda lakes, inland seas etc.
1	2	B, C	1-14	We would suggest adding a monitoring element for trends in characterization of deep-sea habitats such as submarine canyons, which contain significant biodiversity. This monitoring element would highlight the importance of understanding these systems, as they will become increasingly important as interest grows in deep seabed mining.

U.S. Submission on the Draft Monitoring Framework

				<p>An indicator for this monitoring element could be "area of deep sea characterized to [X] specificity". It is unclear if this dataset currently exists as a baseline, but if there is data being developed. We suggest the Deep Ocean Observing Strategy – a Global Ocean Observing System project – serve as a resource for considering indicators.</p> <p>https://deepoceanobserving.org/task-teams/deep-sea-life-habitats/</p>
1	2,3	B, C	14, 28	<p>In our view, expanding the trend to ‘inland waters’ would make this applicable to multiple ecosystems and an indicator could usefully be added for other freshwater ecosystems even if the monitoring metric is not yet available. This would acknowledge the need exists. The following indicator is intended to be used for SDG 6.6.1 and could be adopted here: “Assessment of extent of water bodies will disaggregate lakes from reservoirs, so that changes in natural compared to non-natural ecosystems can be compared.” This indicator has the benefit of having reporting from the Ramsar Wetlands Convention contributing to it as well.</p>
1	3	C	24	<p>We are concerned that average marine pH might not be ideal as an indicator for all coral reefs, depending on the location of sampling stations. Corals tend to be close to coastlines (with some exceptions) and acidic contributions from the mainland (coastal acidification) becomes a more immediate factor that may not be adequately captured if the sampling stations are further offshore.</p>
1	3	C	29	<p>We recommend this be expanded beyond bird and mammal extinctions. This could be measured for all taxonomic groups that have been comprehensively assessed (i.e. all species assessed by IUCN Red List criteria) at the geographic scale at which trends are being reported (national, regional, or global).</p>
1	3	B	27	<p>We would suggest changing ‘inland wetlands’ to ‘inland waters’ to be more inclusive.</p>
1	3	C	27	<p>Assuming ‘inland wetland systems’ refers to all inland waters, we would recommend adding the River Connectivity Status Index (CSI) as a river fragmentation indicator: Grill, G., Lehner, B., Thieme, M. et al. 2019. Mapping the world’s free-flowing rivers. Nature 569, 215–221. Another potential indicator could be proportion of river basins, in a country, where environmental flows are provided in accordance with the e-flow methodology of SDG indicator 6.4.2 (Dickens, C., Smakhtin, V., Biancalani, R., Villholth, K.G., Eriyagama, N. and Marinelli, M. (2019).</p>
1	3	C	28	<p>In our view, the indicators above are preferable to the Red List Index (wetland species) as it is not directly relevant to particular water bodies.</p>

U.S. Submission on the Draft Monitoring Framework

1	4	C	37	The term “comprehensiveness” is vague and we would recommend this be clarified. In our view it raises questions that will be useful for tracking and monitoring, particularly in deciding which species fit the indicator.
1	4	A	42	The indicator could be more complete if it included not only protected area coverage but also a protected area effectiveness indicator.
1	4	C	43	We recommend that coverage of other effective area-based conservation measures for terrestrial and inland water areas include areas that are conserved by IPLCs where appropriate.
1	5	C	51	The indicator, “verified impacts on habitat conservation/restoration,” raises questions for us. In our view this could usefully be broken down further to elaborate what impacts are included.
1	5	C,D	56	We suggest soil carbon stocks could also be an indicator for climate regulation/carbon sequestration.
1	5	B	57	<p>Regarding the indicator for “trends in regulation of ocean acidification” (OA), it is not clear if this is trying to track mitigation/prevention efforts to address OA, or whether this is looking to track indicators of OA itself, and this could usefully be clarified. We are not aware of any current coordinated efforts to track governments’ efforts to prevent or manage OA. CO2 emissions, the only prevention method, is tracked elsewhere.</p> <p>There are a number of potential indices related to whether natural systems are being appropriately utilized to mitigate OA, but most are not ready to be applied immediately.</p> <p>Methods such as co-planting ocean vegetation to reduce local acidity are still being investigated and not regularly put in practice. In our view, coverage of coastal marine vegetative ecosystems could be a future indicator if those techniques prove useful and the link between ocean acidity and vegetation is better established.</p> <p>The health and effectiveness of the open ocean carbon pump is similarly difficult to track and poorly understood.</p> <p>Another option that might be useful to consider is to track the biodiversity of plankton species known to be vulnerable to OA – some scientists are trying to develop a “pteropod index” to show how pteropod species abundance and distribution is changing with OA, but we note that this is still in a very developmental phase.</p>

U.S. Submission on the Draft Monitoring Framework

				<p>The relevant OA SDG Indicator is 14.3.1 - average marine acidity. This indicator is at Tier 2 (methodology is established and standards are available, but data are not regularly produced by countries yet).</p> <p>Alternatively, the Global Ocean Observing System (GOOS) produces the Surface Ocean CO₂ Atlas (SOCAT), which compiles ocean biogeochemical data annually. GOOS is an effort of the IOC and WMO, so it is endorsed by an intergovernmental body. However, this would be an indicator tracking ocean chemistry itself, not nature’s ability to regulate OA.</p>
1	5	B	58	We would suggest changing ‘freshwater,’ to ‘inland water’ to be inclusive of soda lakes, inland seas etc.
1	5	C	59	<p>Potential indicators of quality of inland waters from the new set of SDG 6.6.1 indicators:</p> <p>An indicator on global water quality including trophic state (monthly and annual data) and turbidity.</p> <p>UNEP DHI developed indicator on inland wetland status, baseline from European satellite data.</p> <p>Another potential indicator for timing could be proportion of river basins, in a country, where environmental flows are provided in accordance with the e-flow methodology of SDG indicator 6.4.2 (Dickens, C., Smakhtin, V., Biancalani, R., Villholth, K.G., Eriyagama, N. and Marinelli, M. (2019).</p>
1	5	C	62	This indicator does not seem clearly related to regulation, nor even to nature’s role in regulating hazards and extreme events. Without further clarification, the indicator seems vague and could be subject to interpretation.
1	6	A	64-67	We would recommend the inclusion of an additional monitoring element on “Trends in status of ecosystems providing globally important services for water security and health.” The indicator could be the Freshwater Provisioning Index for Humans (Green, P.A., Vörösmarty, C.J., Harrison, I., Farrell, T. Saenz, L. & Fekete, B.M. (2015). Freshwater ecosystem services supporting humans: pivoting from water crisis to water solutions. Global Environmental Change 34, 108–118)
1	6	A-C	72-76	Given that ABS with respect to genetic resources varies within national jurisdiction and beyond national jurisdiction, we recommend that this be clarified by adding “within national jurisdiction” to the Goal, 2050 Components and monitoring elements.
1	7	A	81-84	We believe a method for establishing a baseline of current resources could usefully be elaborated here to clarify how increases can be measured. Perhaps a cost-benefit test can be applied to allocating resources and setting realistic targets.

U.S. Submission on the Draft Monitoring Framework

2	8	A	1	We would suggest changing ‘freshwater,’ to ‘inland water’ to be inclusive of soda lakes, inland seas etc.
2	8	B	1	There appears to be a disconnect here between the monitoring element and indicators: although this monitoring element relates to land-use plans, the indicators are only related to water.
2	8	C	2	We consider that more specificity than simply the number of countries would be beneficial here, and based on our tracking of ecosystem-based fisheries management, it is possible to track the number of regions within countries as well. In terms of planning, the indicator seems like it would fit better under marine spatial planning (row 4).
2	8	C	4	It may be helpful to see an indicator added on freshwater spatial planning, even if the monitoring metric is not yet available. This would also acknowledge the need for this activity.
2	9	B	19	We suggest changing ‘inland wetlands’ to ‘inland waters’ to be more inclusive.
2	9	C	20	It may be helpful to see an indicator added for other freshwater ecosystems even if the monitoring metric is not yet available (to acknowledge need). We suggest one that will be used for SDG 6.6.1, Change in the extent of water-related ecosystems over time. An assessment of the extent of water bodies has the potential to disaggregate lakes from reservoirs, so that changes in natural compared to non-natural ecosystems can be compared.
2	9	C	24	While this seems like a useful indicator, we believe it would be useful to clarify how it will be used to look at total land area restored. For example, will it be assumed that a reduction in degraded land area represents land area restored?
2	9	B	25	It may be valuable to measure trends in the area of corals restored, but losses are higher than the current capacity for restoration and losses could easily outpace any restoration efforts. Furthermore, coral restoration projects are often short-term, “with 60% of all projects reporting less than 18 months of monitoring of the restored sites.” This could make finding a suitable indicator quite difficult. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0226631
2	10	B	28	We suggest considering adding an element for other freshwater ecosystems even if the monitoring metric is not yet available as a means to acknowledge need.
2	10	C	30	We suggest adding an indicator on free-flowing rivers, particularly the River Connectivity Status Index (CSI): Grill,

U.S. Submission on the Draft Monitoring Framework

				G., Lehner, B., Thieme, M. et al. 2019. Mapping the world’s free-flowing rivers. Nature 569, 215–221.
2	10	A	35	We recommend replacing “freshwater” with “inland water” added to this short list of ecosystems, as this is a more inclusive term.
2	10	C	35	We suggest adding an indicator on freshwater protected areas even if the monitoring metric is not yet available as a means to acknowledge need.
2	11	C	39	We suggest that this indicator be expanded to refer to “sites for terrestrial and inland water biodiversity that are covered by protected areas or other protections (e.g. OECMs)”
2	11	C	42,44	We suggest this indicator be expanded to refer to “sites for terrestrial and inland water biodiversity that are covered by protected areas or other protections (e.g. OECMs) type (SDG indicator 15.1.2)”
2	11,1 2	C	46.51	We note that as a means to apply these indicators, the Ramsar Management Effectiveness Tracking Tool (rMETT) (which is itself a revised version of the terrestrial METT tool) can be applied to inland water protected areas.
2	10	B	26-27	In discussing restoration of marine and coastal ecosystems, it is unclear how the two indicators listed address restoration. These could usefully be made more specific, or revised.
2	12	B	48	The monitoring element, referring to “various governance regimes,” is vague and could usefully be clarified.
2	12	C	49	We note that the Protected Area Connectedness Index can be linked with the River Connectivity Status Index (CSI) for inland waters, so that protected area connectivity can be compared against extent of river fragmentation. This would allow protected area connectivity to be optimized in regions where the ecosystem is not fragmented.
2	12	A	51	T2.6 seems redundant with T2.4 and uses the same indicator so we recommend this be revisited.
2	12	C	51	It is not clear to us whether outcome indicators (e.g. coral cover, fish biomass, seagrass cover) are captured under “Protected Areas Management Effectiveness” and this could usefully be clarified.
2	13	C	58	The proposed indicator is “Proportion of fish stocks within biologically sustainable levels (SDG indicator 14.4.1)”. We note that SDG 14 tends to be applied to marine stocks and not to inland water stocks. We highly recommend that the Post 2020 Framework address this and provide an indicator that can be applied to inland water fisheries. We note that an IUCN motion is in place to address this (https://www.iucncongress2020.org/motion/020) and FAO is in the process of determining globally applicable indicators for inland water fisheries.

U.S. Submission on the Draft Monitoring Framework

2	13	B	60	The monitoring element refers to “safe harvesting operations.” We consider that this phrase could usefully be clarified as it is unclear whether it means safe for humans, or within sustainable or established limits, or something else.
2	13	C	61	The indicator proposed is: “Proportion of traded wildlife that was poached or illicitly trafficked (SDG indicators 15.7.1 and 15.c.1).” We believe it would also be useful to have an indicator related to inland and marine fisheries that addresses illegal, unreported and unregulated fishing (IUU).
2	13	B	63	As with the monitoring element above, it is unclear how the term “safe” should be interpreted here and this could usefully be clarified.
2	15	B	76	It is unclear how “management” is different from “control” in this context. This seems to be already covered in rows 74-75 and we suggest this be revisited.
2	15	C	81	We would propose adding an index to this indicator. In our view, indicators should include inland water systems, not just coastal systems, i.e.,: (a) Index of coastal eutrophication; (b) Index of inland water eutrophication; and (c) plastic debris density (SDG indicator 14.1.1).
2	16	B	89	This could usefully be expanded to be more inclusive of inland water. The monitoring element could read: trends in levels of pollution with inland water and marine plastic.
2	16	C	89	We would propose adding an index to this indicator: (a) Index of coastal and inland water eutrophication; and (b) plastic debris density (SDG Indicator 14.1.1) Since SDG 14.1.1 refers only to marine pollution we believe that inland water pollution should be linked to SDG indicator 6.3.2.
2	16	C	93	The United States monitors ocean noise through the Ocean Noise Reference Station Network, a joint project between the National Oceanic and Atmospheric Administration and the National Park Service. It is an array of 12 sensors. https://www.pmel.noaa.gov/acoustics/noaanps-ocean-noise-reference-station-network
2	17	C	101	While it may be assumed, the indicator does not specifically relate to integrating biodiversity into these plans and this could usefully be clarified.
2	17	C	103	The proposed indicator is “Proportion of fish stocks within biologically sustainable levels (SDG indicator 14.4.1)”. Note that SDG 14 tends to be applied to marine stocks and not to inland fisheries. In our view, the Post 2020 Framework should address inland water fisheries as well, and provide an indicator that can be applied to these. An IUCN motion is in place to address this (https://www.iucncongress2020.org/motion/020) and FAO is in the process of determining globally applicable indicators for inland water fisheries.

U.S. Submission on the Draft Monitoring Framework

2	18	C	103-109	As stated above, SDG 14 does not cover inland fisheries. We recommend the addition of indicators for inland fisheries, even if monitoring metric is not yet available. This would establish the need for further work.
2	18	C	105	If fish stock trends and sustainable management are separate monitoring elements, then this indicator seems to us like a better fit for the trends in fish stocks element.
2	18	C	108	We have serious concerns that the indicator, "MSC certified catch," which in our view is not an appropriate metric. MSC is not a neutral body; rather it has its own agenda and criteria on what it considers "sustainable". Moreover, MSC requires payment for certification. Considering the fact that many sustainable fisheries and fishermen cannot afford to pay for the certification, in our view it seems an inappropriate metric to even be considered as part of this framework and we strongly recommend that this not be included.
2	19	C	110	We do not agree that the IUCN Red list criteria are appropriate for fisheries management and would be concerned with using the IUCN red list for bycatch. While scientists at the National Oceanic and Atmospheric Administration participate in the species assessment for the Red List, the United States does not base our domestic fisheries management actions on IUCN designations. Because the Red List is not universally used in fisheries management, in our view this indicator may not be an appropriate metric to represent fisheries data and management globally, including for bycatch.
2	19	C	113	While the monitoring element is for invertebrate stocks, the indicator is for fish stocks. This suggests the need to have something more invertebrate focused.
2	19	C	115	It is unclear how this indicator, "average income," relates to trends in wild species of fauna used for food and medicine. We would recommend that this either be made more specific to match the monitoring element or be deleted.
2	20	C	124	We recommend the inclusion here of indicators for inland aquaculture.
2	21	C	128	As addressed above, this indicator is not closely related to nature's role in regulating hazards.
2	22	B	137	We have concerns that by including coral reefs here, it seems intended that access to coral reefs increase by at least 100% by 2030 (according to the Target text). In our view, doubling the exposure of reefs goes against the conservation goal as this increases exposure to negative elements (e.g., chemicals, touch). Ecosystem services provided by coral reefs are more important to fisheries and coastal protection,

U.S. Submission on the Draft Monitoring Framework

				so this monitoring element is perhaps more appropriate to include elsewhere.
2	22-25	A-C	140-151	Given that ABS with respect to genetic resources varies within national jurisdiction and beyond national jurisdiction, we recommend that this be clarified by adding “within national jurisdiction” to 2030 targets, monitoring, and indicators.
2	22	B	139	We consider that it would be useful to add a monitoring element for other freshwater ecosystems even if the monitoring metric is not yet available as a means to acknowledge need.
2	25	B	152	We note the term “values” is subjective and difficult to measure. We suggest this might usefully be rephrased as “biodiversity and ecosystem services are considered in planning processes”.
2	26	C	157	This is the same indicator that is listed for T13.1. Using multiple indicators for different monitoring elements does not seem to us to be useful.
2	27	B	159-161	It is unclear how this is different than T13.1, or if it should be different. We suggest combining the language to form a single target for simplicity.
2	27	B	162-166	The baseline may have to account for a downward trend. Would this goal be met if further declines are only 50% of what otherwise would be in the absence of action? It is also unclear what is meant by ecological limits and this could usefully be clarified. We note that surpassing ecological limits sounds like it is to be avoided.
2	28	C	170	This indicator focuses on sustainable consumption rather than sustainable production. This might be a desirable outcome, but in our view it does not quite fit.
2	32-33	A	194-202	<p>We suggest a revision to have these goals better reflect CBD Articles 8(g) and 19(3), to help Parties to realize the benefits associated with biotechnology.</p> <p><u>T16.1. Measures to prevent potential adverse effects, arising from the transfer, handling and use of any living modified organism resulting from biotechnology, on the conservation and sustainable use of biological diversity</u> impacts of biotechnology on biodiversity and human health</p> <p><u>T16.2. Measures to manage potential adverse effects, arising from the transfer, handling and use of any living modified organism resulting from biotechnology, on the conservation and sustainable use of biological diversity</u> impacts of biotechnology on biodiversity and human health</p>

U.S. Submission on the Draft Monitoring Framework

				T16.3. Measures to <u>promote in the field the safe transfer, handling and use of any living modified organism resulting from biotechnology</u> manage potential adverse impacts of biotechnology on biodiversity and human health
2	32-33	C	194-202	We believe the indicators would benefit from specifically referring to “living modified organisms” resulting from biotechnology.
2	35	C	213	We do not believe the SDG 17 indicators are biodiversity specific, and thus in our view they would be more useful through the creation of subsets.
2	38	A	236-238	In line with our general concern that in our view there are too many indicators, we would suggest combining this component with T.19.1.
2	38	C	238	Linguistic diversity does not seem related to biodiversity traditional knowledge. We recommend this be clarified to make the connection more plain or edited to make it relevant.