

## COMPILATION OF SUBMISSIONS RECEIVED FROM ORGANIZATIONS

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Comments on the text and Appendix		
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0	0	The ABS Capacity Development Initiative at GIZ/Germany welcomes the opportunity to take part in the discussions on the Strategic Framework and thanks the SCBD for preparing the draft document. We agree with the general structure and guidance the draft document is providing.
2	5	When it comes to monitoring and evaluation of the effects of the future strategic framework, it has to be kept in mind that we are developing a high-level policy document. The framework will not be implemented through capacity development programs and activities directly. But, as Para 5 says "The purpose of the strategic framework is to guide the capacity development efforts of government and non-government actors...". Any monitoring activities need look into whether and how the framework was taken up by the various actors.
2	6	Para 6 says "In many countries, capacity-building interventions are often implemented through different projects in ad hoc manner and not as part of a coherent capacity development programme or strategy." The framework should address this issue in more detail, a good place would be the section on principles, see comments below.
4	13 Table 2	<p>Para 13 says "Often capacity development interventions focus on activities, based on the assumption that once the activity has been implemented, capacity is in place and results will automatically follow at multiple levels. But it is now understood that sustainability depends on a more holistic approach that needs consideration not only of capacity development, but also of capacity utilisation and capacity retention."</p> <p>Table 2 combines the three levels of capacity development (individual-institutional-societal) with three phases of capacity development, utilisation and retention. That's very useful. And Para 13 implies that a new and holistic strategic framework should address not only the three levels but also the three phases – which it does inherently but not explicitly. Therefore, we see a need to align what we understand as the message of Para 13. and the rest of the draft text by making direct references to the second and third phases in additional paragraphs.</p>

		<p>On a more detailed but nevertheless crucial level table 2 mentions at INDIVIDUAL/RETENTION that “reduction of turnover” is helpful. This assumption is at least debatable, It depends on the organizations and institutions. Often it can be very helpful if certain individuals receive targeted training, become experts in a certain field and carry this knowledge and experience into other divisions of the organizations/institutions or into external organizations. The same knowledge and experience and, ideally, the motivation to use it in different contexts will facilitate nation-wide cooperation. It is advisable to move away from static to dynamic/agile approaches in times when policies and those implementing them can change rapidly and quite frequently. This also refers to para 18 in which the importance of “learning organizations” is emphasised. In many cases real learning relies on those who bring it from the outside to the core of an organization (“interruptive impulses”).</p>
5	16	<p>Para 16 says "The TOC notes important contextual factors such as the fact that legislation and policies are largely in place ..." In our view, this assumption is wrong. According to a quick research in the ABSCH, only 19 from 54 African countries posted measures covering or related to ABS. The TOC needs to reflect the fact that many countries do not have ABS legislation yet.</p>
6	19	<p>Para 19 says "Government and non-government actors would need to state clearly what capacities are being targeted in the results hierarchy formulated for any given capacity development initiative, taking into account what the capacities relate to and whether they are considered to be hard or soft." This task given by the framework to the actors should be dealt with later in the document. Concrete suggestions could be made with regard to tools that could be applied, adapted or developed to support the actors in this task. When the framework talks about international coordination mechanisms in Para 42, the identification, development and coordinated application of such tools could be mentioned as a concrete activity under the framework.</p>
7	Figure 1	<p>Figure 1 (TOC) says at the bottom "Assumptions underpinning the theory: ... Capacity will be utilised effectively and retained". In our opinion, there is a contradiction to what Para 13 implies (see above). For us the message of Para 13 is that capacity utilisation and retention still pose challenges. If that is really the message of Para 13, the TOC cannot be based on the assumption that capacity utilisation and retention are a given. The framework should be very clear and realistic in developing the TOC and be consistent in its various parts.</p>
9	25 & 26	<p>As already mentioned above (Para 6) the issue of coordination of capacity development programs at country level should be mentioned specifically in the framework. Para 25 and Para 26 would be the ideal paces to insert bullet point on that issue.</p>

11	34	In Para 34, the development of more specific action plans to implement the CBD protocols is mentioned. While such action plans are certainly useful, it has to be kept in mind that GEF 7 in contrast to previous programs does not earmark a specific budget for the implementation of these protocols but leaves it to the eligible countries to decide whether they include ABS in their project proposals or not. Because we believe that GEF funding is crucial for the successful implementation of the Nagoya Protocol, we suggest that the TOC should be more explicit in the “context”. Instead of stating that funds are not accessed, it might state that available funds are allocated following competing interests. There need to be much stronger efforts in ABS awareness raising in governments in order to bring funds to this area. Such awareness raising efforts could e.g. form one of the tasks for the committee mentioned in Para 42.
11	36	Para 36 says “Such programmes, unlike the ad-hoc short-term projects, would foster a longer-term vision and approach, and deliver comprehensive and sustainable capacity development outcomes.” In our opinion, the main reason for short-term programs are donor policies and practices. The draft Strategic Framework should address current policies and practices of donors in relation to Para 36 and others to be comprehensive.
12	37	In Para 37 the UNCTAD “Global BioTrade Programme: Linking trade, biodiversity and sustainable development” should be mentioned as a global initiative that offers synergies with the Strategic Framework. The objective of this four-year programme is to provide key stakeholders with the ability to size and capitalize on trade opportunities from linking biodiversity and sustainable development.
12	39	In Para 39, the two sides of capacity development related to the private sector should be mentioned. While the private sector can play a big role in delivering capacity development, it should be also stated that especially SMEs when dealing with biodiversity-based and ABS-relevant value chains need capacity development themselves. Such SMEs need to comply with legal ABS obligations and standards in often more than one country.
13	42	Para 42 says “Possible mechanisms for strengthening capacity development governance could include establishment of a high-level Committee on Capacity Development at the global level and similar bodies at the regional and national levels.” That seems to be a reasonable demand which deserves further considerations and discussions amongst the Parties. The framework should suggest some fields in which such a committee could be active. One task of the committee could be supporting governments in developing approaches for better national coordination of capacity development programs. The committee could identify existing approaches for such coordination and initiating adaptations or developing new approaches together with the governments. The reference to UNDP BIOFIN in Para 45 is very useful in this regard.
14	46	In Para 46, we suggest including the ABS Capacity Development Initiative amongst the mentioned support networks. The ABS Initiative offers tailor-made support at national level covering all three levels of capacity

		development, it upscales best practices in a regional context and in cooperation with anchor institutions as the African Union Commission and it promotes tested methods and concepts in the international context.
15	48	<p>Para 48 says "A campaign will be undertaken to raise awareness of, and support for, the long-term strategic framework. The campaign will target national governments, subnational governments and local authorities, international organizations, development agencies and other key relevant stakeholders, including academic institutions, civil society organizations and the private sector." While the targets of campaign are already described it remains open who will finance and run the campaign. Here, we see a clear link to Para 42. This campaign could be an element of work for an international Committee on Capacity Development.</p> <p>In addition, it seems to be bit unclear for which purpose the campaign would be launched? "Here is a long-term strategic framework for your guidance!" will probably not do it. For this to be effective the key elements and their assets for the relevant actors need to be clearly emphasised. It needs to be kept in mind that this framework is an essential part of the implementation of the upcoming post-2020 but it is not an end in itself.</p>
15	49	<p>Para 49 says in bullet point 4: "Academia and research organizations – contribute research to generate and disseminate knowledge materials to improve understanding of issues and formulation of responses; train the next generation of biodiversity experts;" – Implementation of the framework should start or run parallel in institutions for basic education from high school to adult education other than classic university and research organizations. This is where we reach the next generation of biodiversity first.</p> <p>This aspect is strongly related to the fact that "youth" is only rates a poor second (e.g., para 20, 25, 36, 49, but should be a main target group. The young generation does not only bring innovative ideas to the (technological) implementation and content of CD but also radiates a lot of credibility and, maybe most important, hold responsible position in organizations/government at an earlier age than the generations before. A separate para should be dedicated to their role as a target group of the framework and as promoter of the framework.</p>

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12-13	24-26	<p>After these paragraphs, which are now set out as Option C, there should be another Option D that provides another way how capacity-building is carried out.</p> <p>Options A to C are all top-down or centralized through a global (option A), regional-subregional (option B) or C, coordinated by the Secretariat.</p> <p>These are all good options, but what matters at the initial level is identifying the needs of the communities, sub-national governments, companies, or small groups of organized, or about-to-be organized individuals who may want to, for example, reforest a portion of their degraded land in a far-away town in a remote municipality in a typical developing country. What's worse, they may not even have internet connection, so that's another challenge, but let's assume they have some smartphone with connectivity and they need some know-how with which to do their plans..</p> <p>This is where option D can come in, option D is an online platform which has a menu of topics, and for each topic a drop down menu of service providers or experts who are near their area, ideally this should be arranged geographically and these can be directly contacted by those who wish to undergo capacity-building. Thus, option D is a searchable online repository of knowhow and expertise that can be readily accessed by those interested, where one group may pick up some know-how from some entity who are experts, but these groups who will look at the menu that will be provided by option D are the ones who are interested in applying all these science and technology, even innovation that are generated by options A and B.</p> <p>Option D is a reverse of options A and B, though the Secretariat may help in setting up or coordinating the list-up of orgs or experts who will provide capacity-building on this webpage and for those who may be ignored by some of these high-profile organizations who will not be bothered by small-scale or small-time requests, that's the time other groups can come in. Or maybe these can be arranged such that those who can cater to small groups can be in one category of buttons for such a group while there will be other groups who will deal on an institutional basis, but what we're after here is to capture the ordinary citizen or individual or a small group who will want to do some biodiversity conservation-related in their area. With this, option D will complete the range of</p>

		<p>possibilities for those who may fall through the cracks as they either have to pass through a government agency and some government agencies may not fully reach the farthest reaches of its territory.</p> <p>Another key element that need to be resolved here is funding, who will fund this. Another is the pilot phase to find a way to present the online platform in a manner that will be easy for the user to navigate. The usual security features and quality assurance measures should apply.</p>
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**Form for submission of comments on the Draft Elements of the Long-Term Strategic Framework  
for Capacity Development to Support Implementation of the Post-2020 Global Biodiversity  
Framework**

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9	25	<p>It is essential that governments take ownership of capacity development actions. Otherwise, it will be very difficult to carry out good initiatives and actions focused on biodiversity conservation, even with financial resources for their implementation.</p> <p>Furthermore, mechanisms to involve all the different actors are essential to ensure that the different groups can identify and relate to capacity development strategy. The issue here is: what mechanism will ensure this process?</p>
9	28	<p>It would be very useful for government and non-government actors to have a list of basic indicators that can be used for each objective of the Post-2020 Global Biodiversity Framework. In this way, actors could choose indicators that best suit their context and even so, have inputs that allow evaluating the status of contribution to global goals.</p> <p>Not just “incorporate learning into the results hierarchy”, it is important to define and establish the mechanism and periodicity to incorporate learning since the beginning of the project/program/intervention design. Otherwise, this feedback will not be fast enough for the program or intervention to adapt and be effective in its lifetime.</p>
11	33	<p>The capacity to integrate different sectors with the environmental sector is a great challenge for many countries. We must find the mechanisms to integrate environmental issues in the social sectors and thus obtain financing and long-term follow-up from the government to implement actions working towards biodiversity. We consider that this condition is not exclusive to Mexico, so the development of this capacity is essential for the implementation of this global biodiversity framework. For this reason, FMCN considers strategy C as one of the most important: Align biodiversity capacity development with broader cross-sectoral plans and programmes.</p>
13	41	<p>It is mentioned that there are several guidelines for monitoring and evaluation of capacity development programs, however, it would be really helpful to establish</p>

		<p>general indicators for all countries to review and use accordingly to their capacity development programs. Having standardized indicators globally will facilitate M&amp;E at a global level and therefore, seeing progress at a global level.</p> <p>It is very important to consider the needed technology, platforms and tools to monitor and measure capacity development, since there are large monetary costs associated with them.</p>
14	46	IUCN already has several networks at the national, regional and global levels. The cooperation with this type of existing networks could be sought and used as an implementation mechanism of the Post-2020 Global Biodiversity Framework.
15	48	The dedicated website could include a Monitoring and Evaluation general section where guidelines are shared and suggested global indicators are available and explained.
15	50	The reviews should be carried out at least every 5 years. It seems to us an adequate period of time to evaluate if the strategies, principles and mechanisms of implementation are being adequate, or should be modified for a more effective and efficient implementation.
15	51	The reports on progress and lessons learned, should be inputs that serve all the Parties. We suggest a much more dynamic and simple format that allows relatively quick changes to adjust the strategy.
16	52	<p>This is the most important part to evaluate the implementation status of the global biodiversity framework. Beyond the generation of reports, the use of basic indicators for each of the goals, will help to have a much more accurate vision of what is working, and what is not working, in order to modify, redirect, or strengthen the actions performed.</p> <p>Include these core indicators in the dedicated website mentioned in page 15, paragraph 48.</p>



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5	4	<p>Related to: The capacities that are most urgently needed, I think it is important to add the followings:</p> <ul style="list-style-type: none"> <li>- Capacity to identify and denounce drivers of biodiversity loss, including deforestation.</li> <li>- Capacity to plan, implement and monitoring gender-responsive biodiversity conservation, including gender assessments</li> </ul>
7	Figure 1	<p>Theory of change: in relation to <b>good practices &amp; process...</b> strategies should include the recovery, valuation and respect of existing local and traditional knowledge and practices of biodiversity conservation and governance (Aichi target 18).</p> <p>Related to assumptions: It is crucial to add as an assumption that capacity development, policy process and decision-making spaces are not mediated and appropriated by corporations</p>
Pag 8		<p><b>Principles:</b> should include the capacity to acknowledge the <b>interconnectedness</b> of biodiversity governance and conservation with other sectors: forest, water, land, climate, environment, including consumption; as well as the intersection and integration of biodiversity with climate change.</p>
Pag 12	4	<p>‘Engage the private sector’, I have my doubt if this is a key strategy to improve capacity development. Experience is demonstrating that private sector practices usually are contributing to biodiversity loss, including loss of traditional knowledge and practices. In any case, this framework should align this sector to the principles and agreements of the Nagoya Protocol, Aichi target 3, 5, 6, 7, 10 and 18.</p>
3 and 14		<p>Resource mobilization strategy for the post 2020 should include that reforms are needed to redirect pervasive incentives which are drivers of biodiversity loss.</p>
		<p><b>Additional:</b> capacity building should include feeling the gaps for many country governments on the issue of 8(j) in legislative and policy interventions on the rights of IPLCs</p>

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Comments on the text and Appendix		
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0	0	Overall comment: Recommend the long-term strategic framework for capacity building be revised to include a time frame aligned with the Post2020 Global Biodiversity Framework goals and targets, as well as an mechanism for monitoring and assessment of capacity building/capacity development impact.
6	20	Suggest to keep the language consistent in the document, when referring to the different categories of stakeholders as, “governments and non-government actors”.
7	Figure 1	<p>“High level outcomes box”:  Delete “governments and all relevant stakeholders”  Edit first dot point: [Governments] successfully implementing their NBSAPs.  Edit second dot point: [All relevant stakeholders] effectively mainstreaming biodiversity across sectors and society.</p> <p>“All stakeholders” box:  Should include the private sector, since it includes other specific stakeholders (e.g. “academia” and “NGOs”).</p>
8	23	Suggest that an element missing here in the success factors relates to identification of a sustained and committee funding resource.
8	24	Suggest that it is highlighted here more specifically that there needs to be a clear assessment of need, and that need is clearly identified and supported as relevant and appropriate.
9	25	Welcome recognition of the need for greater country commitment to capacity building initiatives, as opposed to reliance on non-government actors to drive them.
12	39	We welcome proactive engagement of the private sector by governments to support national capacity development initiatives. We note that members of the GIC have long engaged in such initiatives through Public Private Partnerships ( <a href="https://croplife.org/news-views/public-private-partnerships/">https://croplife.org/news-views/public-private-partnerships/</a> ) that are aimed at mutual development and benefits.
13	42	Encourage such a high-level Committee to have equal representation by all categories of non-government actors.
13	43	Caution against creating a new committee with extensive administrative support or financial resources required as these would divert such resources away from the actual capacity building/capacity development.
14	46	Caution against establishing new regional and global support networks. Suggest that there are existing structures in place that should be the focus of

		strengthened efforts to avoid allocating resources to establishment of new networks.
15	48	Also caution against allocating extensive resources to this information campaign that would be diverted from actual capacity building/capacity development.
15	49	Suggest that it is necessary to involve these stakeholder groups more actively in development of the capacity building framework, rather than inviting them to consider their potential roles after the framework is complete. There should be a purposeful and directed effort to reach out to each category of stakeholder early on in the process. For example, as a private sector representative, we only received information about the online forum one week before it began and there has been no effort to involve the private sector in a coordinated manner.
15	49	For the “private sector” point – include “research” as a major area of contribution. R&D companies are actively engaged in scientific research and contribute to scientific discourse along with their counterparts from “academia”.
15 - 16	51-52	The reporting of the use of the strategic framework and the lessons learned should be done in a structured way. The development of a set of core indicators will strongly facilitate meaningful reporting and evaluation. We support the involvement of existing bodies (e.g. the CBD Subsidiary Body on Implementation) that can build upon accumulated experience of how best to score progress. We caution against the development of new bodies (e.g. the high-level Committee on Capacity Development, proposed in section VI) as experience has shown that the creation of new structures without proper assessment of their need would lead to further delays in implementation due to the inevitable need to adjust their work based on experience.

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Page #	Paragraph #	Comment
0	0	<p>We recognize and congratulate the efforts to start a change of paradigm when it comes to Capacity Development for Biodiversity. The terminology change from “Capacity Building” to “Capacity Development” was needed to start changing the narratives towards a better understanding of the beneficiaries from the CD interventions.</p> <p>Nevertheless, we feel that a deeper intersectional approach is needed. Integrating gender, ethnic, class, and age considerations could transform completely the pre-formed idea about CD. Not including this approach could lead to unsuitable strategies that at the end will have the same results as before and which would be disconnected from the local realities, superficial interventions that are mentioned in the study carried out by UNEP-WCMC.</p>
0	0	<p>We feel that a Post 2020 Capacity Development Strategy needs to put right-holders, <u>who</u> have less access to CD and have more potential to contribute to the implementation of the new Biodiversity Framework, <u>at</u> the core. If all non-State actors are put together without any differentiation or priority considerations so these stakeholders are visible, the approach is not going to allow the change that this Strategy is seeking.</p> <p>Women, youth, children, indigenous, local and afro-descendant communities* are key stake- and right-holders that governments need to prioritize. This proposal needs to consider the structural inequalities that affects the access of these collectives of rights-holders to CD resources and funding.</p> <p>* In many countries, afro-descendant communities are not recognized as local communities and cannot benefit from the policies supporting local communities.</p>
2	Footnote 4	<p>Change or words order:</p> <p>"In this framework, the term “non-government actors” refers to indigenous peoples and local communities, <b>women, youth and children</b>, United Nations organizations and programmes, other multilateral environmental agreements, associations of subnational governments and local authorities, intergovernmental organizations, non-governmental organizations, <del>women and youth groups</del>, business and finance sectors, the scientific community, academia, faith-based organizations, citizens and other relevant stakeholders.”</p> <p>Rationale: We think that in the non-governmental actors definition, IPLC<sup>2</sup>s, women and youth must be together at the beginning of the paragraph, recognizing this way that people and rights-holders will be prioritized over</p>

		institutions, organizations and other sectors. Also, it is important to recognize children as a different beneficiary in this case because children and youth need different approaches regarding CD.
5	17	<p>Add:</p> <ul style="list-style-type: none"> <li>• “To create enabling conditions: The ability to develop and enact effective <b><u>and participatory</u></b> biodiversity policy and legislation, related strategies and plans based on informed decision-making processes for global biodiversity management.”</li> </ul> <p>Rationale: Participation -of IPLCs, women, youth and civil society- is an enabling condition stated in the TOC of the Post-2020 Biodiversity Framework, so we think that if we talk about enabling conditions for CD it is important to mention this here as well in order to maintain consistency in the narratives.</p>
6	20	<p>Add:</p> <ul style="list-style-type: none"> <li>• Succession planning and youth development</li> </ul> <p>Rationale: Succession planning is a process and strategy for passing on leadership roles. It helps identifying and developing new leaders who can replace old leaders when they move on to new opportunities or retire, increasing the availability of experienced and capable people that are prepared to assume these roles as they become available.</p> <p>The capacity for succession planning and youth development is a priority functional need which was not identified on the UNEP-WCMC study, probably because they didn’t have enough participation of youth representatives in the conducted interviews (they mention that 3 people were interviewed from IPLCs and Youth).</p> <p>Creating strong partnerships with youth-led organizations for the implementation of the Strategy, ensuring participation of youth in related decision making processes for example through youth delegates, creation of early career positions at all levels in implementing institutions and organizations, are some of the best practices that could be implemented to ensure youth development for an sustainable intervention.</p>
7	Figure 1. Visual representation of the Theory of Change	<p>Add:</p> <ul style="list-style-type: none"> <li>• Women</li> <li>• Children</li> <li>• Youth</li> </ul> <p>Rationale: We feel there is a gap in the stakeholders regarding Youth and Women. As IPLC’s, who are included as a defined stakeholder to give special attention, we think that these two stakeholders should also receive the same attention.</p> <p>Women are especially affected by the lack to access to capacity development programs, where mostly men are benefiting from.</p> <p>It is also crucial to give special attention to capacity development interventions targeted at children, especially with regards to formal curricula reforms and non-formal education programs that will ensure that biodiversity awareness begins at an early age.</p>

		<p>And youth should be a priority target group for capacity development programs since the capacity required for succession planning is needed if we want to reach the 2050 vision. If young students and professionals are not actively engaged in the capacity development programs at all levels, they won't be ready to start the change when it is time for them to lead the implementation efforts from different sectors of society and achieve the vision for Biodiversity of living in harmony with Nature.</p>
8	23	<p>Add: “ (...),and the need for integrating a gender perspective <b><u>and ensure intergenerational equity in</u></b> biodiversity capacity development interventions.</p> <p>Rationale: Intergenerational equity means fairness or justice between generations. It also advocates for generations in decision-making positions to be accountable for their choices and to acknowledge, respect, hear and give space for younger generations to be included in decision-making processes at all levels.</p>
9	24	<p>Add:</p> <ul style="list-style-type: none"> <li>Integrate gender perspectives fully <b><u>and ensure intergenerational equity in</u></b> assessment and analysis.</li> </ul>
9	26	<p>Add:</p> <ul style="list-style-type: none"> <li>Ensure the sustainability of the capacity development through instruments and tools that will allow for the design of future interventions based on the present experiences.</li> </ul> <p>Rationale: In order to formulate strategic and holistic approaches to capacity development it will be important to ensure that future implementers will continue with the interventions based on what has been already done, what worked out well and what needs to improve.</p>
9	26	<p>Add:</p> <ul style="list-style-type: none"> <li>Design Capacity Development interventions with an intersectional approach using disaggregated data, reflecting the realities of the different target beneficiaries.</li> </ul> <p>Rationale: The use of disaggregated data on the previous research needed before implementing a CD intervention will be key to understand the gaps and needs of the different stakeholders that are targeted as beneficiaries. This is something that many CD interventions don't consider and is a root cause for failure.</p>
9	27	<p>Add:</p> <ul style="list-style-type: none"> <li>Incorporate gender considerations <b><u>and ensure intergenerational equity</u></b> to ensure the full involvement of women <b><u>and youth</u></b>; and,</li> </ul>
10	28	<p>Add:</p> <ul style="list-style-type: none"> <li>Formulate the results hierarchy and indicators through an inclusive, participatory and gender responsive process, <b><u>ensuring intergenerational equity</u></b>, with the key stakeholders who will be involved in implementation;</li> </ul>
10	29	<p>Add:</p> <p><b><i>(g) Intergenerational equity should be ensured in biodiversity capacity development efforts</i></b></p>

		<p>30. Ensuring the full and effective participation of younger generations in the design and implementation of capacity development efforts will be crucial to ensure the sustainability of the interventions. Succession planning will be key to ensure that we reach the 2050 vision of living in Harmony with Nature. To accomplish this, it will be key to engage youth meaningfully through strong partnerships with youth-led organizations, establishing institutional mechanisms for their full and effective participation in related decision-making processes and interventions design. It will also be important to support youth-led implementation of the Strategy and youth capacity development initiatives, with the allocation of adequate resources for this purpose at local, national and international levels.</p>
12	36	<p>Add:  “(….)Such partnerships should take into account the knowledge and expertise held, for example, by indigenous peoples and local communities, women and youth, to ensure successful implementation, <b><u>supporting also the capacity development initiatives led by these key stakeholders.</u></b>”</p> <p>Rationale: IPLCs, women and youth have knowledge and expertise which not only need to be taken into account for initiatives designed by the implementing agencies. These key stakeholders already have developed entire systems and programs of capacity development that would strengthen the national and local results if these are supported adequately.</p>
14	45	<p>Add:  “(…) There is a pressing need for resources to be available to indigenous peoples and local communities and other local actors <b><u>as women, youth, children, and afro-descendant communities</u></b> so that they can implement activities at ground level. Very often these are the groups with the least capacity for accessing and managing financial resources. National capacity development initiatives should, therefore, include this need as a high priority for action planning.</p> <p>Rationale: It is important to define some of the most vulnerable local actors so they are actively taken into account for accessing and managing financial resources.</p>
15	48	<p>Add:  “(…) A dedicated website will be created to share information regarding the long-term strategic framework and the <b><u>best practices led by governments and other stakeholders</u></b>, experiences and lessons learned in its implementation.”</p> <p>Rationale: For us, it is crucial that governments are encouraged to carry out deep research about the best practices led by different stakeholders, because in many cases there are already great initiatives taking place which just need adequate support. The development of a catalogue of capacities and best practices could be of great help for these sometimes not visible efforts.</p>

**Form for submission of comments on the Draft Elements of the Long-Term Strategic Framework for Capacity Development to Support Implementation of the Post-2020 Global Biodiversity Framework**

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Comments on the text and Appendix		
Page #	Paragraph #	Comment
0	0	<p>Tout d'abord, je voudrais remercier SCDB pour préparer ce forum de discussion pour poursuivre notre travail sur la préparation du GBF post-2020.</p> <p>Le renforcement des capacités est la base de toute action concernant la biodiversité. L'approche participative a démontré son efficacité dans la réussite des projets. Un tel projet ambitieux, comme le cadre mondial de la biodiversité doit être élaboré pour et par toute les forces vives de la société. C'est la raison pour laquelle l'élément du renforcement des capacités doit être la clef de la réussite de ce projet. C'est aussi crucial de mettre en valeur le cadre stratégique à long terme pour le renforcement des capacités au-delà de 2020, en faisant liaison avec les objectifs du Convention Mondiale de la Biodiversité en l'occurrence l'objectif 7. Il est également indispensable de garder sans décontracte comme file de référence la synergie entre le cadre mondial de la biodiversité et celui du renforcement des capacités. Ainsi le cadre doit être inclusif dans la mesure que les forces actives participent à la réalisation de ses objectifs.</p> <p>Pour mettre en évidence ce renforcement des capacités, il me semble que la définition de la méthodologie demeure primordiale pour avoir une vision claire de ce qu'on doit faire. Cette méthodologie se base sur trois points essentiels :</p> <ol style="list-style-type: none"> <li>1. Faire un diagnostic du « terrain social » concerné par l'action du renforcement des capacités. Définir les lacunes, les besoins, catégoriser le « corpus social » le degré d'assimilation de la formation.</li> <li>2. Définir la méthode, les moyens, les défis... Ce diagnostic étroit et rigoureux nous permettra aisément de définir les modules de renforcement et nous aider à définir une feuille de route ou une « ordonnance social » à suivre pour atteindre les objectifs qui ont été définis avant.</li> <li>3. Définir un plan d'évaluation –court terme- moyen terme- long terme. Ce plan d'évaluation nous permettra de délimiter les points forts et les points faibles de la méthode, ainsi que le degré du développement des capacités. Ce plan nous permettra aussi de pouvoir mettre à jour aussi bien la méthode, que les moyens, suivant les obstacles et les défis rencontrés. Et plus on a</li> </ol>



		<p>un programme issu du diagnostic, plus qu'il soit rationnel et réalisable, et plus qu'on minimise le degré de l'échec.</p> <p>Le renforcement des capacités se base aussi sur le processus de dialogue, et l'inclusion de l'analyse du contexte, et prévoir une vision du long terme. IL est évidemment important pour optimiser le temps, de tirer les leçons ou plutôt les expériences de renforcement des capacités à travers les COPs depuis la COP6 et en tirer les options à améliorer comme l'apprécier Mr Owgal.</p> <p>En guise de fin, comme le cadre mondial de la biodiversité est très ambitieux, l'élément du renforcement des capacités apparait plus compliqué. Sa complexité peut être un avantage pour se pencher plus sur l'innovation et la réflexion. On constate déjà plusieurs barrières qui peuvent constituer de véritables défis, à savoir les langues autochtones. Si les peuples autochtones contrôlent environ 80./. de la biodiversité, et si la majorité des gouvernements ne reconnaissent pas les langues autochtones, ou ne rentrent pas dans leurs priorités de développement durable, on imagine déjà les défis énormes qui pèsent sur la mise en œuvre du cadre mondiale de la biodiversité.</p>
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**Form for submission of comments on the Draft Elements of the Long-Term Strategic Framework  
for Capacity Development to Support Implementation of the Post-2020 Global Biodiversity  
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Comments on the text and Appendix		
Page #	Paragraph #	Comment
-	-	<p>IUCN considers the draft elements a robust conceptual basis for the long-term Strategic Framework for Capacity Development. We welcome the opportunity to comment.</p> <p>The comments included herein complement those made directly in the Online Discussion Forum.</p> <p>One main point that we wish to emphasize from the outset is that it is first important to establish if lack of capacity is the barrier to action with the targeted individual, organisation or system. Otherwise, interventions based on awareness and providing the evidence-base for action are needed before individuals are ready to build capacity to take action (FAO's Capacity Development Framework is a good source of information). In addition to targeting capacity development needs, in order to plan and implement programmes that will result in competent individuals, organisations and systems that can be effective, it is important to be clear on <u>what kind</u> of capacity needs to be developed (e.g. to address a specific threat), and then be clear <u>how</u> to develop that capacity (methods, learning, training, experience), plus align with institutions and partnerships that have the capacity to do this.</p> <p>In addition, while targets and objectives often set the frame for capacity development, there are many cases where it is the situation that drives the development of capacity, i.e. the need to address a threat which mobilises everyone on how to do that. Capacity development works in situated learning experience - learning by doing – and deliberate capacity development seeks to understand why and how that capacity was developed and how it can be scaled up to similar situations. The document should emphasize how learning communities are created and how they learn.</p>
1	3	The draft elements presented here and the future long-term strategic framework for capacity development could benefit from further explanation as to how existing capacity development strategies from other biodiversity-related conventions will be

		<p>considered. Enhancing synergies between capacity development efforts from other processes should start from the design of the long-term strategic framework and not be limited to one of the key strategies to improve its implementation at the national level.</p> <p>In addition, other background information should be mentioned here specifically as the draft elements have effectively taken from this work. This includes the “<i>Findings of a survey on capacity-building for coherent implementation of the biodiversity-related conventions conducted by IUCN</i>” as listed in the <a href="#">CBD website</a>. Explicit reference could be made as follows:</p> <p>“Furthermore, the draft takes into account the findings of the survey on capacity development for coherent implementation of the biodiversity-related conventions, which was conducted by the International Union for Conservation of Nature (IUCN) in the context of a United Nations Environment Programme project entitled “Environmental Treaties Programme: Realizing Synergies for Biodiversity”, supported by the European Union and the Government of Switzerland, as well as an analysis of capacity development for biodiversity and ecosystem services carried out by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES).”</p> <p>The IUCN survey report, entitled “<i>Capacity building and synergies across the biodiversity-related conventions: Contributing to the design and subsequent implementation of a Long-term Strategic Framework for Capacity development for Biodiversity beyond 2020</i>” is available as document CBD/POST2020/WS/2020/2/INF/3 at: <a href="https://www.cbd.int/doc/c/233f/98e7/b5e4973c007e4562aefb4dcc/post2020-ws-2020-02-inf-03-en.pdf">https://www.cbd.int/doc/c/233f/98e7/b5e4973c007e4562aefb4dcc/post2020-ws-2020-02-inf-03-en.pdf</a>.</p> <p>The analysis (UNEP/IPBES/3/INF/3) is available at: <a href="https://ipbes.net/document-library-catalogue/unepipbes3inf3">https://ipbes.net/document-library-catalogue/unepipbes3inf3</a>.</p>
2-3	9	<p>It would be useful to have as a departing point a concept/an understanding of capacity development that is wider in its scope. The one used by UNDP (<i>Capacity Development: A UNDP Primer. 2009</i>) and which explains capacity development as “the process through which individuals, organisations and societies obtain, strengthen and maintain the capabilities to set and achieve their own development objectives over time...” seems more appropriate. Here capacity is about growth, growth of the individual in knowledge, skills and experience. Understood in this way, capacity development is an unendingly evolving process of growth and positive change.</p>
4		<p>III. STRATEGIC DIRECTION AND OUTCOMES</p> <p>It is suggested that there should be global milestones or targets to guide the capacity development efforts in relation to the post-2020 Global Biodiversity Framework.</p>
4	14	<p>It is unclear why the period/timeframe is 2030 instead of up to 2050 as in the Vision of the Strategic Plan for Biodiversity 2011-2020 as well as in the proposed Post-2020 Global Biodiversity Framework. Also, this particular “version” of the Vision is different than the one in the visual representation of the Theory of Change, why?</p>
4-5	14	<p>Both the vision and overall goal should be simpler and straightforward. Strengthened capacities at all levels are needed in order to effectively implement the Post-2020 Global Biodiversity Framework when adopted and global biodiversity goals and targets. It must emphasize that capacity development here is a means to achieve the global biodiversity targets and not an end in itself.</p>

5	17	How do these capacities “most urgently needed” relate to the capacity results listed further down in the document (paragraphs 20-21)? Will the development of these capacities be prioritized in the framework given they are under the section called “Strategic direction and outcomes”? If so, these are quite general and could benefit from more specificity – “biodiversity-wise”.
6	19	It is generally true that capacity development needs to be targeted towards what has been agreed in the objectives framework i.e. the NBSAP or the Global Biodiversity Framework with its underlying targets and indicators. But this pre-supposes that it is completely understood what kind of capacity will lead to these results. In many cases, it is not known either exactly how to deliver a result or how to target specific capacity to achieve that result. An important part of capacity development is to understand what is effective and what works in a particular situation, to derive best practices from these examples and then to translate these into effective learning programmes. Capacity development must include a strong component of knowledge accumulation and analysis to be able to confidently propose methods that are transferable into new situations. There is also a need to determine which methods work best for understanding, assimilation and transfer of knowledge, and this can be very context-specific. The global PANORAMA initiative led by GIZ and IUCN, with several further partners, is an example of a strong effort to derive lessons from best practices, to understand why these approaches are effective and to translate these into practice through recombining building blocks in new situations. These can then be drawn from and applied to targeted efforts to build new capacity.
6	21	It is crucial to address technical needs presumably identified beforehand by relevant stakeholders. However, this presupposes that these technical needs are known. For protected and conserved areas, IUCN and its World Commission on Protected Areas (WCPA) have developed a Register of Competences for Protected Area Professionals that systematically identifies all of the different capacities required to be exercised by different levels of managers to achieve the basic standards of effectiveness for protected area systems and sites. Many examples of the application of these capacities are captured in <a href="#">PANORAMA: Solutions for a Healthy Planet</a> , a partnership between GIZ, IUCN, UN Environment, GRID-Arendal, Rare, IFOAM - Organics International and UNDP . It is possible to search for PANORAMA solutions that demonstrate how a particular capacity is applied in practice.
7	Figure 1	It is hard to see the desired change expected to be achieved in this representation of the Theory of Change. It is not clear what is the situation that we are departing FROM and where is it that we want to get TO. It is unclear in this figure (and to some extent in the explanation before) how planned activities and interventions would lead to the desired goal and vision.
8	24	Demand (needs) should always be the departure point for any capacity development intervention. Gaps and needs should not be assumed but gathered from relevant stakeholders and "target audiences". The “extensive stakeholder mapping” mentioned here is very welcome.
9	25	Capacity development is also supply driven from the local level. Good practices engaging local actors can provide examples and demonstrations of what can work, and this can be elevated into capacity development programmes. Learning is a process of progressively engaging with situations, working out possible solutions and applying these, and adapting knowledge and understanding on the basis of what is effective.  <a href="#">PANORAMA: Solutions for a Healthy Planet</a> is a mechanism to link learning by conservation practitioners - solution providers and solution seekers/users - rather than a top-down or completely bottom-up process. The draft framework being

		<p>considered here ties capacity development very strongly to the hierarchy of targets, goals and objectives of the draft Post-2020 Global Biodiversity Framework, which characterises and largely forces capacity development into complex institutional delivery mechanisms.</p> <p>Another approach is to foster peer-to-peer learning and exchange and to bring providers and users of new capacity to interact more directly. As the draft framework suggests, there are many delivery models possible, including the work of BIOFIN but also that of PANORAMA (e.g. through targeted virtual and in-person match-making between providers and seekers).</p>
10	29	<p>This draft framework emphasizes a great deal what needs to go <b>into</b> a capacity development strategy, such as integrating gender perspectives into efforts. Yet, learning does not only take place from deciding what kind of capacity is needed, but rather <u>observing what capacity is effective in practice</u>, i.e. drawing from and understanding from an analysis of practice what is likely to be effective in multiple situations. The draft framework does emphasize that there should be communities of practice, but it does not emphasize the need to collate experiences, to analyse and understand them and then to actively promote their dissemination and assimilation.</p> <p>Regarding gender for example, the way PANORAMA works, it to analyse cases in the database to show how gender has been critical to a successful outcome, and thereby build capacity on how gender mainstreaming is effective. Clear case studies showing effective gender mainstreaming, especially if documented by actors including women at source, is a more powerful means to develop capacity in this regard than simply to set a framing condition that gender should be integrated.</p>
11	34	<p>Developing thematic capacity development action plans after the Global Biodiversity Framework is adopted will effectively make interventions planned much more focused and targeted.</p> <p>It is suggested that the thematic capacity development action plans be <i>aligned</i> rather than <i>complementary</i> to the long-term strategic plan.</p>
12	36	<p>This paragraph could draw attention to examples of successful implementation partnerships that could be leveraged successfully to help deliver this draft framework on capacity development, e.g. BIOFIN and PANORAMA.</p> <p>The PANORAMA partnership could be further developed to make a significant contribution to this process. PANORAMA already contributes significantly to capturing and developing learning across themes including protected and conserved areas, ecosystem-based adaptation, business and biodiversity, agriculture and others, and a systematic development of PANORAMA with key partners could support a much wider scope of relevance as suggested here.</p> <p>A draft decision on the adoption of the Strategic Framework for Capacity Development could specifically invite PANORAMA, BIOFIN and other named initiatives to contribute and this would strengthen their ability to build and resource the partnership.</p> <p>Suggested wording could be:</p> <p>“Invites the PANORAMA - Solutions for a Healthy Planet, a partnership between GIZ, IUCN, UN Environment, GRID-Arendal, Rare, IFOAM - Organics International and UNDP, to: a) collate examples of best practice solutions for implementation of targets and goals; b) make these available in communities of practice through online</p>

		platforms, thematic webinars and others; and c) present case studies, and through workshops and peer-learning events, discuss, understand, disseminate, assimilate and apply solutions.”
12	37	There should be space for more “flexible” approaches and governance arrangements to enhance and promote synergies beyond what is already in place. For example, a “Task Force” composed of capacity development experts from different organizations and governments from different regions (probably on a rotation level) could be established and be charged with the monitoring, review and effective deployment of the long-term strategic framework.
12	39	Inclusion of “the private sector” in this list of strategies seems mis-placed when looking at the other suggestions. Why single out the private sector amongst other partnership groups? Suggest to move this para under E. Promote partnerships and networks for implementation (para 39). Delete “ <b>Many</b> of the technical and financial resources, expertise and technologies useful for the conservation....., lie in the hands of private entities.” And replace with “ <b>Some</b> ”.
13	42-43	Probably an “intermediate” governance mechanism should be envisaged to bridge “high-level” monitoring and streamlining with more “practical” coordination and delivery of the long-term strategic framework and its planned interventions and activities. As above, a Task Force of some sorts could be envisaged. Here, experts should find a space to provide guidance and advice and also raise concerns and provide concrete recommendations to the high-level Committee on Capacity Development. This Task Force however, must be conceived as a flexible and evolving mechanism, one that can be adapted to the time frame and context of application of the strategic framework. Its structure and composition should be thus equally flexible.
13	43	While blended learning combining online and face-to-face exchange with peers is effective for building capacity, a general “capacity building forum” is unlikely to be successful, particularly in a post-covid world where large gatherings will not be the norm. Instead, smaller, targeted capacity exchange days could be promoted before or after thematic meetings which would connect individuals around particular learning themes, such as protected areas or business engagement.
14	47	Requiring Parties to report on capacity development would increase their reporting obligations (and the burden Parties often refer to). To assess progress nationally, this could be reframed as to share progress accomplished on capacity development in a setting that lends itself and allows the exchange of experiences. Ultimately, it is reporting progress (or lack of) in the implementation of national biodiversity targets and their contribution to the Global Biodiversity Framework that will speak of the effectiveness of capacity development actions.
15	48-49	<p>Other mechanisms for rolling out the framework should be considered alongside a campaign and a website. Here emphasis should also be placed on existing mechanisms that have already proven effective to deploy capacity development programmes and not only on “key stakeholders” with defined roles. Perhaps a separate paragraph could refer to these existing mechanisms or alternatively, refer to the partnerships that are in place and which have lead the design, development and delivery of such mechanisms.</p> <p>As suggested above for paragraph 36, a draft decision on the adoption of the Strategic Framework for Capacity Development could specifically invite PANORAMA, BIOFIN and other named initiatives to contribute, and this would strengthen their ability to build and resource these partnerships in support of effective capacity development for implementation.</p> <p>Suggested wording could be:</p>

		<p>“Invites the PANORAMA - Solutions for a Healthy Planet, a partnership between GIZ, IUCN, UN Environment, GRID-Arendal, Rare, IFOAM - Organics International and UNDP, to: a) collate examples of best practice solutions for implementation of targets and goals; b) make these available in communities of practice through online platforms, thematic webinars and others; and c) present case studies, and through workshops and peer-learning events, discuss, understand, disseminate, assimilate and apply solutions.”</p>
15	49	<p>It is suggested to re-order the list of contribution of the private sector to put financial resources at the end, not as the first item. In IUCN's capacity building experience on business engagement, found under the <a href="#">BioBiz Exchange</a>, lesson 101 is do not ask up front for financial support – if there is a business case, the financial resources will flow. (“Private sector – multiple areas of contribution such as infrastructure development, technical expertise, provision of products and services, <b>and financial resources...</b>”).</p>

**Form for submission of comments on the Draft Elements of the Long-Term Strategic Framework  
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Comments on the text and Appendix		
Page #	Paragraph #	Comment
6	20 bullet 5	The study of the UNEP- WCMC says monitoring and evaluation, but reporting is not mention,
6	21	In order to have a unify technical needs identified for the post-2020 framework Technical capacities and thematic capacity development, should be a suggested list from the Executive Secretary, SBI and SBSSTA. Otherwise criteria will not be an unify.
7	Figure 1	All stakeholders are not represented. Due consistency of language should address: Women, youth and other relevant stakeholder groups
8	Box 1	It listed: Biodiversity partnerships, coalitions and networks established There is a need to name which... ¿such as? e.i. Local governments, academic communities, etc...  Footnote quote 22 can support this: 22 These could include the IUCN-led PANORAMA web platform, the NBSAP Forum, the UNDP-led International Capacity Development Network for Sustainable Water Management (Cap-Net), the CitiesWithNature initiative and others along the lines of the Climate and Development Knowledge Network (CDKN) or the Coalition on Paris Agreement Capacity Building.
8	Box 1	Intermediate, medium-term outcomes made direct reference to gender, and leaves out IPLC and youth. Due consistency of language should address:



		“indigenous peoples and local communities and stakeholder groups, including women and youth” Find previous quote from page 9 parra 25, page 6 parra 20 bullet 1 et al.
8	Box 1	In the output 5: Effective monitoring and evaluation (M&E) systems in place  Suggest adding “clear”and also considering “reporting”
9	27	Doesn’t mention IPLC and it is an endogenous capacity.
9	27 bullet 3	If there is a “Diversify capacity development delivery methods and approaches” it should have a counterbalance on a unify M&E System and could also add <b>reporting</b> .
9	27 bullet 5	“Target resources and activities at the ground level” should be communicate and connected to stakeholder and decision makers.
9	28	This part of the document is not link to a further consideration located in page 13 parra 41 “a need for more specific guidance and tools ... guidance could be undertaken by an expert group”.
10	28 bullet 1	Again, IPLC and youth inclusion is missing
10	30	It is very general to say “funding considerations”. It should be clear if the funds already exist or should be generated. Where are these funds coming from?
13	42	Consider that a “high-level Committee on Capacity Development” in a low budget context will be hard to develop and maintain unless a budget line is previously set.
14	44	“Related to this, international cooperation projects and programmes must be designed to foster long-term capacity development”  How, when?

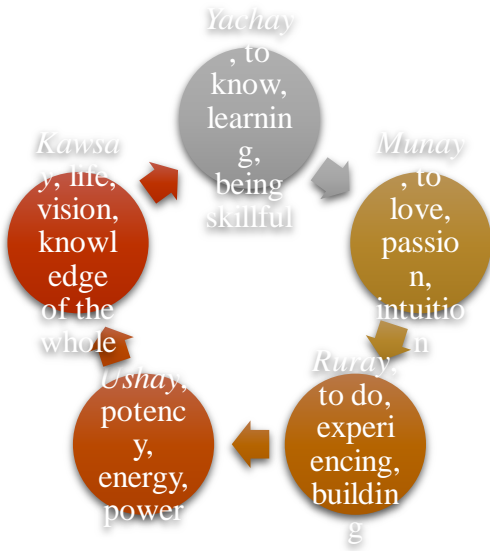
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Page #	Paragraph #	Comment
0	0	<p>To achieve post 2020 MPA targets, beyond the creation of new protected areas and stronger protection measures in the future, it is crucial to ensure the effective management of MPAs at the local level, including adequate human capacity and material resources, as well as securing sustainable financing.</p> <p>Networks of MPA managers are considered a cornerstone to help improve management effectiveness of member sites and support the implementation of MPA strategic goals with direct impact on ocean conservation at every scale.</p> <p>MPA Networks bring together existing initiatives and partnerships and connect them with people working on the ground, providing them with an overview of the global and regional biodiversity conservation framework, and tools and initiatives to benefit their sites and the network as a whole.</p> <p>Networks of MPA managers are coordinated platforms addressing common management and conservation challenges. By facilitating a dialogue among managers and key stakeholders addressing effective management of marine biodiversity and promoting activities on the ground of mutual benefit, MPA networks facilitate relevant decision-making processes at local, national, regional and international levels.</p> <p>Currently, existing MPA manager networks cooperate at the Transatlantic level, joining efforts in addressing common issues to support MPAs technically, financially and strategically.</p>

		<p>Networks of MPA managers are successful platforms to address capacity building by providing a mechanism to exchange knowledge and expertise. National and regional networks, by gathering MPA managers on a permanent basis and with an operational focus, provide the stage for creative problem solving, and sharing knowledge, expertise and financial resources among protected areas facing the same challenges.</p> <p>Networks also help MPA managers develop specific skills such as community and stakeholder engagement, ocean governance, communication and outreach, priority-driven fundraising, and addressing global issues such as climate change.</p>
7	Figure 1	<p>Related to the box “Result in all stakeholders”:</p> <ul style="list-style-type: none"> <li>- Specify stakeholders at all levels</li> <li>- Mention to protected areas managers could be added</li> <li>- Mention to private sector</li> <li>- Clarify the difference between societies and civil society (the second could be included in the first one)</li> </ul>
11	36	<p>Mention could be added on the importance of establishing new or strengthening current national and regional networks of protected areas managers, with a sustainable source of funding to support their activities, so that they can deliver permanent, operational, and adaptive capacity-development programmes for protected areas managers.</p>
14	46	<p>Related to the mention to “the regional implementation support networks for protected areas”:</p> <ul style="list-style-type: none"> <li>- Specify that those networks are regional networks of protected areas managers</li> <li>- Mention to national networks of protected areas managers could be added.</li> <li>- Cooperation, at global level, between regional networks, could be also added.</li> </ul> <p>In the related footnote (number 24), a specific mention could be added related to <a href="#">existing cooperation between regional and national networks of marine protected areas managers, at Transatlantic level</a>, to build capacity of marine protected areas with a long-term and operational approach.</p>

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Comments on the text and Appendix		
Page #	Paragraph #	Comment
20	E 2	Implementation support mechanism
	a)	Action against environmental crime affecting biodiversity; including making ecocide an international crime.
20	b)	Calling for the adoption of a Declaration of Rights of Mother Earth by the UN to complement the Human Rights Declaration.
20	c)	Including Nature in legal systems of all nations as a rights bearing entity and a subject of law, with the right to exist for future generations of all life and flourish independently of the use to humans.

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Comments on the text and Appendix		
Page #	Paragraph #	Comment
0	0	<p>Rights of Nature provide the underlying legal basis for a necessary transformation of the human-nature relationship. Nature is currently not included as a rights-bearing entity in most legal systems. But, as noted by the UN Harmony with Nature Programme, federal, state and local governments around the world are increasingly adopting laws that recognize the rights of Nature and the natural world to exist and flourish. In many cases, these new laws are the product of collaboration between non-governmental organizations, civil society associations, legislators and legislative bodies, working together to draft, adopt and implement laws recognizing Nature as a subject of rights and/or a legal “person”, protected by law.</p> <p>To support transformational change towards realizing the 2050 vision of living in harmony with nature, a balance between human rights and rights of nature has to be reached. As an enabling condition, rights of nature have to be recognised at an international level by adopting a Universal Declaration of Rights of Nature. Capacity around how rights of nature will influence policy and practice at local, regional, national and global level is needed.</p> <p>Effective sanctions against large-scale destruction of ecosystems have to be implemented by adopting ecocide as an international crime. Capacity to define and prosecute ecocide needs to develop within the International Criminal Court.</p>

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Comments on the text and Appendix		
Page #	Paragraph #	Comment
1	1	In the line 12 after the word stakeholders ADD , Indigenous Peoples and Local Communities, <b>IPLCs</b>
1	2	In the line after the word organizations, ADD <b>including IPLCs' organizations</b>
2	8	In the line 4 after the word some, ADD <b>intercultural</b>
3	10 (a)	In the line 4 after the word protocols, ADD <b>biocultural community protocols, customary laws, values</b>
3	12	The Plan for Capacity Development refers to hard and soft capacities, it should create skills and capacities for LIFE, especially to attend the IPLCs post pandemic complex ad urgent needs
4	14	The Theory of Change should be based also on Indigenous Peoples fundaments, values, mandates and principles to achieve real changes and social justice. Some Indigenous <b>Values</b> : Harmony and balance, Generosity, Respect, Courage, Wisdom, Humility, Honesty, Respect for elders and women, Regard for children as sacred, Respect for the given word, Mutual support and reciprocity (give to receive), Solidarity, Care for one another, Gratitude, Self-reliance, Respect for others' choices, Accountability to the collective, Humility in the sacrifice for the collective, Harmony with nature, Recognition of powers in the unseen world, and Stewardship of the earth, among others (Cajete 2011; Chela, 2002; De la Torre & Sandoval, 2004; Mamani, 2008; Ramírez, 2008; Terán, 2010).
5	17	In the paragraph about To learn and adapt, in the line 2 after the word methods, ADD <b>including those from IPLCs</b>
5	17	In the line 5 after the word adversity, ADD <b>and pandemic</b>
6	20	After the line 7, ADD <b>Access and Benefit Sharing, Mutual Agreed Terms, Bio cultural Community Protocols, Consultation, Free, Prior and Informed Consent</b>
10	30	To implement successfully the Capacity Development together with different strategies should be also taken in consideration some Indigenous Fundaments such as:

		 <p>Source: García, et al. (2004)</p>
12	39	In the engagement with the Private sector it is important to make this sector to understand the role and collective rights of IPLCs. During this pandemic, many Indigenous Peoples are being displaced from their ancestral lands due to the mining and timber activities. Should be respected our right to self-determination, to food, water and territorial sovereignty, our right to secure life, to consultation and Free, prior and informed consent, as well as the rights of Mother Earth which is a sacred and alive being and is being destructed together with all her ecosystems
13	41	Indigenous Peoples have our own ways of measuring the effectiveness of capacity development by testing its benefit and functionality in our daily activities
13	42	The establishment of a high-level Committee on Capacity Development should include IPLCs from the geographical regions recognized by the CBD
14	46	Should be mentioned IPLCs organizations that are carrying out several types of activities, for instance RMIB-LAC that has being providing capacity development for several years in different areas for Indigenous women and 20% of men from LAC
15	48	IPLCs including women and youth should be targeted in the campaign
15	49	In the paragraph of Academia and research organizations in the line 3 after the word biodiversity ADD <b>intercultural and multidisciplinary</b>
15-16	50-53	<p>In the paragraphs on Reporting and Review of the Framework if this an alive document it should be revised on the lens of the current pandemic to analyze or consider critical facts such as the violation of Indigenous Peoples and Indigenous women collective rights, the invisibility of IPLCs, the lack of policies to attend their emergent needs related to health, water, food, medicine, housing, education, etc. the lack of dialogue between the national governments and IPLCs, the difficulty of IPLCs to receive some bags with western food and /or government economic benefits due to their inexistence on national databases, the lack of having a national identity document or to the application of ambiguous national laws and treaties. The post pandemic will urge to have a new holistic and intercultural agenda based on the current needs at all levels, including the CBD and its protocols.</p> <p>In these new global circumstances of life, we have the following questions: how all social actors are going to act/react to CBD meetings and negotiations? How IPLCs livelihoods are being affected and modified? What is necessary to considered for capacity development for post pandemic? Will each Indigenous community, pueblo, nation have the right to plan its own program/ activities according to their real needs, epistemologies and cosmovisions? How the SMART indicators going to reflect the disappearance of many Indigenous Peoples, cultures and</p>

		<p>languages and the destruction of Mother Nature during this pandemic? Are we going to collect and promote the thinking, testimonies, and guidance of Indigenous elders to recover the Balance and Harmony between People and Mother Nature? How the Transformative Change is going to consider the effects of the pandemic on humanity and Mother Earth?</p> <p>We need “remember to remember” that: <i>The crisis of sustainability has occurred only when and where this union between knowledge, livelihood and living has been broken and knowledge is used for the single purpose of increasing productivity...Ecological sustainability will require a patient and systematic effort to restore and preserve traditional knowledge of the land and its functions...Sustainability will not come primarily from homogenized top-down approaches but from careful adaptation of people to particular places. This is much a process of rediscovery as it is of research (Orr David)</i></p>
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3	12	My argument is that the term “soft capacities” greatly undermines the description intended and contradicts the sentence “Soft capacities are extremely important but are not often given due consideration”. Even though the term “soft” has been used for years, just like capacity building evolved into capacity development, a more appropriate term is “essential” capacities. This addresses the critical importance of these capacities, for example, visionary leadership and effective governance, without which “hard” capacities are ineffective. Being an apex organisation, the CBD should lead the way by using more appropriate terminology and changing the status quo.

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	Overall comment	Resiliency to changes in who is governing (and capacity to govern) should be addressed as a capacity development goal. How do we weather changes in leadership and subsequent sometimes drastic changes in policy so that long term capacity development efforts and the building blocks set in place to meet biodiversity goals can continue and expand without interruption? Without figuring out how to be stable enough to withstand changes, we may experience perpetual setbacks and find ourselves unable to keep up with goals. For example, with subnational regional capacity building work already taking place around biodiversity goals in some nations, so much hope is built up amongst stakeholders but as soon as a new president comes in with different priorities, everything may be destabilized and hope lost, funds redirected, and critical relationships that took years to build strained.
	Overall comment	Communication needs to be more directly discussed (though it's a subtext in the document) as a priority capacity development need. This is a complex topic that covers outreach and engagement throughout all levels of society, learning to make conceptual and culturally relevant translations of words like biodiversity and transformative change, ensuring that the CBD and its goals (and the importance of them) are understandable and accessible to the general public, being able to hold professionally facilitated discussions, communicating links between biodiversity and other issues people are concerned about (like waste, air pollution, social justice, and rising food prices), and general capacity for awareness raising for an <b>extended</b> period of years across every age level and group. Communication is also necessary for the process of learning to imagine and envision a different future and how to co-create solutions to get there.
	Overall comment	Capacity development should address not just structural but systemic barriers to change – or the root, intersectional causes of our biodiversity issues. This understanding of the complex interplay of issues and how to engage stakeholders and communities in co-imaging and implementing transitions from these systemic problems is a critical development need. If root causes are not addressed, we may not be able to accomplish the GBF goals at the pace required to make a real difference for our future. For example, if governments still see one type of economic system reliant on high levels of “growth,” “development,” consumption, industrial agriculture, and massive inequity and disparities in justice and health between the haves and have nots as the system they must stick with, they will lack incentive to fully implement capacity development efforts

		throughout their governments and society for meeting biodiversity (and climate) goals.
	Overall comment	Include addressing the technical capacity issue of governments being asked to meet and report on multiple, layered and sometimes diverging requirements from multiple MEAs they've signed onto as well as the SDGs. Without greater capacity, they may end up making choices about which MEAs will get the highest priority based on funding, international pressure, and national political pressures – and biodiversity can lose out. So if they're feeling the pressure for housing development, they may prioritize housing development under the guise of meeting SDGs and completely bury biodiversity goals within the environment ministry. Likewise, this non-integration is encouraging governments to continue to separate biodiversity from "industry." Fisheries may then be classified as industry and not considered under the lens of meeting biodiversity goals even though they should.
	Overall comment	Local community non-profits are handling many conservation and community building activities on too little funding. They are often asked to provide support to governments on activities like meeting biodiversity goals and reporting with little or no compensation. It's important to make sure: "capacity development includes funding and institutional support for local non-profit organizations."
4	1 + Table 2	Add the flexibility to simultaneously balance long term and emergent solutions as situations change.
5	3 (17.)	Be explicit about the capacity to communicate with every member of the general public. No one should be left out of the discussion on protecting biodiversity or not understand why it's vital to every person's future and livelihood.
6	2 (20.)	Be explicit about the capacity for integrating social concerns and needs – health, well-being, poverty alleviation, inequity and injustice, and social science sectors – with biodiversity.
8	Box 1	Include something along the lines of "established local community and indigenous peoples engagement" under outcomes.
8	3 (24.)	The discussion of "relevant stakeholders" may create too much of an opportunity to limit stakeholders or overly narrow the field of engagement. Who selects for "relevance" and how? Since technically everyone is a stakeholder in this, perhaps there needs to be different language about inclusion of stakeholders. Ensure that there's an open process for stakeholders to request participation? Ensure not just "relevant" but a diverse and representative sample of stakeholders across diverse communities?
9	2 (26.)	Interventions should not just be based on national ownership and leadership – local community ownership and leadership should be included. National governments can sometimes overlook on the ground needs. Prioritizing being in tune with locals and fostering local ownership is important to highlight.
9	3 (27.) bullet point 6	Concerning interventions being "results-oriented"... While this applies to some types of intervention situations, excellent capacity development interventions may also be measured qualitatively over long periods of time (many years) and need to be fully supported over the long term. The focus on "results" can create pressure for any sort of short term results (not necessarily meaningful) and effectively punish experimentation, iteration, and long term change efforts. This could get in the way of long lasting capacity change. Perhaps instead of saying "results-oriented," say "Design capacity development interventions to create sustainable, evident change."

9-10	4 (28.)	For monitoring and evaluation, add a reflexive review of local community and indigenous peoples inclusiveness.
10	1 (29.)	This is great!
11	5 (36.)	High level partnerships (big orgs and donors) can backfire in the long term because they can lock in social inequities and an economic system that doesn't work for the well-being of both people and nature. The partnerships discussion, although it mentions taking into account knowledge from local communities, still reads somewhat top down. Listening and co-ownership should be emphasized to help prevent issues associated with a focus on high level partnerships.
14	1 (45.)	National governments may act as too much of a middle man for capacity funds being utilized as truly needed by local communities (as the communities see it and communicate it themselves, though ideally informed in partnership with independent experts). Local communities should be at the table with governments and funders when planning for capacity funding.
14	2 (46.)	Support networks should include ensuring easy access to and funds to pay trained, independent people capable of facilitating dialogues amongst people from different fields and sectors – anthropologists, psychologists, etc. – essentially social science experts who develop meaningful engagement.
15	2 (49.)	Similar to an earlier comment, the use of the term “key partners and stakeholders” may lead to very narrow definitions of who gets to participate in, contribute to, and know about the goals and process. A community led bottom-up approach is needed as much as high and mid-level leadership. Call for a “breadth of and multiple access points to diverse local participation.”
15	4 (51.)	Directly including local communities in reporting could help with transparency and accountability. It could also help create a culture of awareness about efforts and co-ownership of failures and successes for meeting biodiversity goals.

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0	0	The strategy provides a very good theoretical basis and its principles and approaches are very helpful. When it comes to the mechanisms for implementation, the strategy shifts to convey a rather linear understanding of capacity development and suggests that successful capacity development for biodiversity conservation, sustainable use and access and benefit sharing can somehow be centrally orchestrated which is not necessarily the case. Also, the strategy should be focus on enabling, encouraging, exchanges of good practises and be inclusive.
0	0	We would like to take this opportunity to reiterate the continued support of UNCTAD's BioTrade Initiative to the CBD, the achievement of its objectives and the implementation of a post-2020 global biodiversity framework. UNCTAD BioTrade can significantly contribute with experience, lessons learned, best practices and research on sustainable use, sustainable trade and ABS, including a knowledge management platform. The shift to sustainable trade is crucial to achieve global environmental objectives and an opportunity to incentivize sustainable practices and ABS and bring different actors from the public, private, academia and civil society. This will contribute to the transformational change we need. Considering the shift to sustainable trade, good practices and experiences related to the framework in the long-term strategic framework will enable mainstreaming biodiversity into the business sectors, across ministries and link the global and local levels.
1	3	UN Agencies, such as UNCTAD with its BioTrade initiative, have an important role to play and contribute, as well as in enabling and supporting capacity development.
2	7	As was mentioned in a number of comments in the online discussion forum, a timeframe for this strategy beyond what is mentioned under Section F would be helpful.
4	14	If the desired capacity level to achieve the mission, goals and target of the GBF is only reached by 2030, how will there be sufficient time to use the capacities to implement the GBF?
5/6	18	This paragraph presents capacity development and then implementation of NBSAPs as a linear process whereas in reality capacity development is a mutually informing dynamic and cross-fertilizing process of continuous learning and building up.
7	Figure 1	The Theory of Change is well developed. UN Agencies and other NGOs are important stakeholders for capacity development and we also considered they

		should be mentioned, especially since one of the long-term outcomes is mainstreaming biodiversity throughout sectors and society.
11	34	Instead or in addition to what is being proposed in this paragraph, the thematic and cross-cutting Programmes of Work of the CBD or other action plans developed to guide the implementation of the post-2020 global biodiversity framework could cover thematic capacity development.
12	37	To successfully mainstream biodiversity, this paragraph should be considered involving other partners.
12	39	This paragraph may be made more precise. For example, who should engage with private sector and how should this actually work?
13	42	The paragraph should explain why the governance of capacity development is critical for ensuring effective, impactful and sustainable capacity development results. This assumption is not further explained. There may be a certain risk in aiming to streamline or provide dedicated institutional oversight on biodiversity-related capacity development since the strategy should encourage anyone with an interest to develop capacity or engage in the development of capacity without necessarily being it centralized. For example, we suggest the consideration of an advisory group focused on enabling, fostering sharing and replicating experiences and knowledge management, and engaging rather than providing oversight.
13	43	We recommend to further clarify what these two new institutions are, what the committee and forum want to accomplish, how will they work in relation to the CBD and other biodiversity-related MEAs bodies, and how other actors can engage. Both the committee and the forum may need in a way to have their own theories of change.