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Agenda item 16

COMPILATION OF SUBMISSIONS RECEIVED FROM ORGANIZATIONS ON THE LONG-TERM STRATEGIC APPROACH TO MAINSTREAMING AND THE VOLUNTARY ACTION PLAN

Note by the Executive Secretary

I. INTRODUCTION

1. In decision 14/3, paragraph 17, the Conference of the Parties decided to establish a long-term strategic approach to mainstreaming biodiversity and, in paragraphs 19 (b) and (c), requested the Executive Secretary to develop it further by working with the Informal Advisory Group on Mainstreaming of Biodiversity established as per paragraph 18 and with the terms of reference provided in annex II to the decision. The result of that work was considered by the Subsidiary Body on Implementation at its third meeting and the outcome of its considerations is reflected in its recommendation 3/15.
2. In paragraph 1 of recommendation 3/15, the Subsidiary Body on Implementation requested the Executive Secretary, subject to the availability of resources, in consultation with the Bureau of the Convention on Biological Diversity, to complete the work under decision 14/3 as follows:
 - (a) To invite Parties, other Governments, indigenous peoples and local communities, relevant stakeholders and partners, to review the long-term strategic approach to mainstreaming biodiversity and its action plan and to submit their views to the Executive Secretary;
 - (b) To prepare a compilation of submissions received and to make it available for consideration by the Conference of the Parties at its fifteenth meeting to support an in-depth Party-driven review of the long-term strategic approach to mainstreaming biodiversity with a view to its finalization.
3. The invitation in paragraph 2 (a) above was communicated to Parties and organizations through notification 2022-025 issued on 21 April 2022, and the Secretariat subsequently received 15 submissions from Parties and 15 from organizations. The present document provides a compilation of submissions received from organizations on the long-term strategic approach to mainstreaming (LTAM) and its voluntary action plan.¹ The submissions have been reproduced in the form and language in which they were received.
4. The submissions are also available at <https://www.cbd.int/notifications/2022-025>.

¹ Submissions from Parties are compiled in documents CBD/COP/15/INF/10 and CBD/COP/15/INF/11.

II. COMPILATION OF COMMENTS FROM ORGANIZATIONS

Strategy area I: Mainstreaming biodiversity across government and its policies

HEADLINE ACTION 1: Fully integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts, integrating spatial planning and applying the principles of the ecosystem approach

Business for Nature

i. General position on mainstreaming

While Parties are responsible for the implementation of the Post-2020 Framework, its objectives cannot be achieved without the meaningful and constructive contribution of businesses in implementing the Framework. The CBD Long-Term Approach on Mainstreaming recognizes business and finance as one of the key actors for mainstreaming, however the current draft Framework does not fully integrate them as part of the solution.

Mainstreaming biodiversity into all decision-making is a critical condition to achieving the objectives of the Framework. Therefore, the Framework must promote the mainstreaming of biodiversity:

- into the mandates of all relevant policies, ministries, and finance regulators.
- into the decision making, core-strategies and disclosure of businesses and financial institutions.

Business for Nature supports the draft elements of the Long-Term Strategic Approach to Mainstreaming (CBD/SBI/3/L/17) and its accompanying Action Plan (CBD/SBI/3/13/ADD1). However, we believe that the findings of the Long-Term Approach to Mainstreaming should be stronger reflected into the Post-2020 Global Biodiversity Framework.

Key elements for Business for Nature are:

- **Acknowledging all four parts of society** as identified by the CBD Long Term Approach on Mainstreaming (i.e., governments, businesses, financial institutions, and civil society). This whole-of-society approach must be recognized throughout the Framework. If the Post-2020 Framework explicitly recognizes and provides a clear role for businesses and financial institutions, it has the potential to make them engaged and co-responsible in the implementation of the Framework.
- **Establishing a process to develop business relevant indicators in the monitoring framework.** For businesses to be engaged, accountable and co-responsible in the implementation of the Framework, targets relevant for businesses must be supported by a set of SMART indicators assigning clear actions to business and creating accountability to achieve the targets and facilitate regular monitoring and review of progress. These indicators must be developed through a thorough and consultative process ahead of the COP15.
- **Including business plans and commitments on nature in national commitments:** to empower businesses to act at the necessary scale and urgency, the Framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans. For that, national strategies and

commitments should include business plans and commitments as part of a joint public-private approach to reverse nature loss.

- **Supporting the mainstreaming of biodiversity into businesses and financial institutions'** decision making, core-strategies and disclosure. This can be achieved by promoting regulatory measures which allow financial institutions and businesses to align financial flows to a nature-positive world.
- **Supporting the Task Force on Nature-Related Financial Disclosure (TNFD).** A commonly accepted way to report nature-related risks and dependencies is required to support the inclusion of nature in financial decision-making and investment, as with the TCFD on climate. Such an exercise needs to be linked to existing TCFD efforts and build on on-going work on measuring and valuing nature. Disclosure is required to ensure a level playing field and inform investors who can then redirect financing away from nature-negative outcomes.

ii. Suggestions for concrete actions on mainstreaming to be included in the Framework

Business for Nature supports the proposed actions and activities as outlined in the Action Plan for the LTAM (CBD/SBI/3/13/ADD1). Many of those proposed actions are relevant for business, but we also acknowledge that the whole of the proposed Action Plan is important to mainstream biodiversity and empower all stakeholders (government, business, finance, civil society) to implement the necessary activities.

For some of the proposed activities Business for Nature has specific comments and suggestions. These are presented in detail in the annex, including also concrete proposals for textual amendments and/or additions to milestones and actors. Here we summarize our key comments and suggestions:

iii. Mainstreaming biodiversity across governments and its policies

Action Area 1 - Fully integrate ecosystem and biodiversity values into planning, development processes, strategies, and accounts

- **Action 1.1** to systematically apply strengthened biodiversity assessment, valuation, accounting tools and methodologies at all government levels is important for business, because it will support businesses with their contributions to the implementation of Target 15. Especially relevant for business are activities 1.1.3 and 1.1.4 for which suggestions are included in the annex to further strengthen these activities:
 - Activity 1.1.3: **ADD** a call to governments to align public and private natural capital accounting, by aligning the implementation of SEEA Ecosystem Accounting with business applications and by ensuring accessible national natural capital data that is contextual and spatially relevant for business at least at a landscape level.
 - Activity 1.1.4: **ADD** the need to promote the use of national metrics by all stakeholders. And also, **IDENTIFY** National Statistical Offices as key actor.
- Also, **Action 1.2** to enhance policy coherence is crucial for business, as coherence of policy on climate change, nature loss and social inequality at all levels, will create the level playing field that supports business' contribution to achieve a just transition. Most relevant for business are activities 1.2.2 and 1.2.3. An omission is the absence of a specific action on enforcement:
 - Activity 1.2.2: **ADD** a specific reference to mandates of ministries and other relevant government institutions.

- o Activity 1.2.3: **ADD** a reference to NDCs and NAPs.
- o An omission is the absence of a specific action on enforcement. In order to create a level playing field, a new action should be included that focuses on the adoption and effective enforcement of environmental laws and standards. Business for Nature proposes to **ADD** a new action with milestones for Parties and UNEP, in collaboration with other UN bodies.
- **Action 1.3** is important for business, as it will promote implementation at local levels. Most relevant are activities 1.3.2 and 1.3.3, for which we have added suggestions for further strengthening:
 - o Activity 1.3.2: **ADD** “including incentives” to the first milestone of the possible milestone. And **SPECIFY** voluntary “sustainable” certification in the second milestone, as not all certifications cover all essential aspects of sustainability and specify contribution “to” biodiversity.
 - o Activity 1.3.3: **ADD** to actors ‘Food and agriculture organizations’, as they can bring the voice from on the ground practitioner and farmer communities, that are necessary to provide the insights for successful implementation of the policy measures.

Action area 2 - Mainstream biodiversity in fiscal, budgetary, and financial instrument

- **Action 2.1** on reforming environmental harmful subsidies (Target 18), is crucial for creating a level playing field for business that support business’ contributions to achieve Nature positive. However, the language of this action needs to be aligned with that of Target 18. To strengthen this action and its activities, we have the following suggestions:
 - o First, to amend the text of the action by focusing on all companies and remove ‘in key economic sectors’. And also specify more clearly that this action aims to prohibit all forms of incentives, including subsidies, that are harmful for biodiversity, including by redirecting them to biodiversity-positive activities.
 - o Activity 2.1.1: **ADD** a new milestone on disclosure and development and adoption of plans.
 - o Activity 2.1.2: **FULLY CHANGE** the proposed milestone to be more in line with Target 18. We suggest the following language: “By 2025, Parties have developed plans to identify and reform all direct and indirect subsidies and incentives harmful for biodiversity, by redirecting or eliminating, and ensure that financial savings are channelled to support biodiversity domestically and internationally and positive incentives are scaled-up in harmony with the Convention and other relevant international obligations.”
- Also, **Action 2.2** on positive incentives is crucial for creating a level playing field for business. However, the language of some activities can be strengthened or need to be aligned with that of Target 15:
 - o Activity 2.2.1: **ADD** a specific milestone on adoption of mechanisms and standardized metrics to value ecosystem services delivery.
 - o Activity 2.2.3: **FULLY CHANGE** the proposed milestone to be more in line with Target 15. We suggest the following language: “By 2025, Parties have adopted mandatory requirements for business and financial institutions to assess and disclose their impacts and dependencies on natural capital.”

1. Integrate nature and biodiversity into business models, operations and practices of key economic sectors, including the financial sector

Action area 3 - Businesses in all relevant economic sectors and at all levels transition towards sustainable technologies and practices

- **Action 3.1** is a key action for business as it links directly back to Target 15. All proposed actions are relevant for business. However, some activities need to be updated for progress made by the TNFD, and accompanying actions by governments are needed; without an enabling environment from government, business cannot succeed. We have the following suggestions to further strengthen the proposed activities:
 - o Activity 3.1.1: **ADD** milestone focusing on the role of Parties to develop the enabling environment that supports business. For this we propose the following language: “By 2025 Parties have established programs to support capacity building and business action to develop and implement metrics for assessing their impacts and dependencies on natural capital and committing to science-based targets towards operating within planetary boundaries.”
 - o Also, related to Activity 3.1.1, we suggest to **ADD** Parties as actor, and **AMEND** the list of actors.
 - o Activity 3.1.2: **UPDATE** the milestones based on the plans and development of the TNFD, and **ADD** specific milestones for establishing a framework for nature-related financial disclosure by 2023, establishing programs by Parties to support capacity building and private action by 2025, and Parties adopting and implementing mandatory requirements for business to assess and disclose their impacts and dependencies on biodiversity by 2030.
- **Action 3.2** on business transformation is important, but needs more direction, by referencing to an overarching goal for nature. Also, specific suggestions can be made to make some of the proposed activities stronger:
 - o Activity 3.2.1: **ADD** capacity building, integration in NBSAPs as well as a specific reference to Nature positive. And also **INCLUDE** a specific milestone on the adoption of science-based targets for nature.
 - o Activity 3.2.6: **ADD** the notion of voluntary “sustainable” certification, as not all certification schemes cover all essential aspects of sustainability
 - o Activity 3.2.10: **ADD** to actors the notion of the on the ground practitioner / actors as a key source of information and insights.
- **Action 3.3** on collaboration is crucial as focuses on curating the collaboration across the whole-of-society. Without this we will not be able to mainstream biodiversity successfully. However, several suggestions can be made to strengthen proposed activities:
 - o Activity 3.3.1: **ADD**: Role for Secretariat and Parties. Also, **BROADEN** the scope beyond the GPBB, and **ADD** a new milestone on setting up national collaboration.
 - o Activity 3.3.2: **ADD** specifically business and finance chapters as part of future NBSAPS. Also, **ADD** Business for Nature as one of the actors.

Action area 4 - Financial institutions apply biodiversity risk assessment policies and processes, to demonstrate decreasing negative impacts on ecosystems and biodiversity

- **Action 4.1** on applying metrics on nature in finance is important to mainstream biodiversity into finance, and crucial for enabling finance of nature positive business action. However, the activities can be made more concrete by aligning it with the TNFD developments:
 - o Activity 4.1.1: **ADD** TNFD as a key actor, as well as a reference to the TNFD framework. And **MERGE** the two Milestones.

- **Action 4.2** is also important to mainstream biodiversity into finance. Again, there is a need to align it with TNFD developments. And there is a need to add several actors to contribute.
 - o Activity 4.2.2: **AMEND** the Milestone to align with TNFD progress.
 - o Activity 4.2.3: **ADD** Parties and natural capital dependencies in the milestone. And **ADD** UNSD, OECD and World Bank Group as relevant actors.

iv. Mainstreaming biodiversity across society

Action area 5 – Engaging society

- **Action 5.1** is important as it will help empowering all stakeholders to act. Especially activity 5.1.2 is relevant for business but could be strengthened:
 - o Activity 5.1.2: **ADD** a reference to the private sector as actor.
- **Action 5.2** can be further strengthened by including a reference to farmers:
 - o Activity 5.2.1: **ADD** “including farmers” after the local communities.

For detailed and textual suggestions to the wording of activities, milestones and actors, please see the annex.

EcoNexus

Additional considerations with thanks to Simone Lovera of Global Forest Coalition for some suggestions.

i. Decision 14/3

In the notification, we are invited to refer back to Decision 14/3 paragraph 13 points a-r: but these are **too weak** to address the power of the agriculture, fisheries and aquaculture, forestry, tourism, health, energy, mining, infrastructure, manufacturing and processing sectors in driving production and consumption, including built-in obsolescence and other methods of enabling economic growth at the expense of people and planetary life support systems.

ii. The LTAM itself and by extension the draft Action Plan

The process of developing the current drafts

This was very problematic because, in addition to the Informal Advisory Group, set up to include an equal number of Parties as Observers, we also had an **Extended Consultative Network** that included many industry representatives and this network could be added to freely without oversight. At the same time, there seemed to be little Observer or Party focus on the process. This industry influence seems set to continue: the current text of the draft recommendation proposes to:

...further strengthen, national, subnational, regional or global business and biodiversity partnerships as institutional partners for the implementation of the long-term strategic approach (paragraph 9 CBD/SBI/3/CRP.16)

However, what is actually required is regulation, and **perhaps the most extraordinary thing about the draft LTAM and Action Plan** (and also the current GBF draft, especially targets 14-16) **is that NOWHERE is regulation mentioned directly**. Yet **strong government regulation** is the only way we can make the mainstreaming of biodiversity – and the GBF - meaningful.

Indeed, we feel that mainstreaming targets 14-16 are without value unless:

- governments enact framing legislation to compel business to be fully accountable for all its actions with sanctions for failing to do so.
- governments legislate to prevent business: a) from deliberately creating addictive products and persuasive and constant advertising and b) thereby damaging public health

A related problem with the draft LTAM and Action Plan (also true again of targets 14-16) is that they address government, business and society separately, without addressing **the relationships and power imbalances between them** and the urgent need to **regulate business and finance effectively** in order to end their damaging impacts on biodiversity, climate and people – and also on the authority of governments.

This means that the **LTAM and thus the Action Plan need to be completely re-structured** in order to address these issues.

Furthermore, the LTAM does not address the underlying drivers of biodiversity destruction (named by IPBES as: **production and consumption patterns, human population dynamics and trends, trade, technological innovations and local through global governance**). These are caused by our current economic system, based on **the current economic model that requires endless growth in exploitation and consumption**.

iii. Power imbalances

The current draft LTAM and Action Plan reveal clearly that none of the real problems will be addressed by it due to the following:

- The power imbalance between the sectors of government, business and consumers and other rightsholders including women, Indigenous Peoples, local communities, peasants and youth, is too great, and this is a fundamental flaw that cannot be addressed with tweaks.
- Business is the most powerful because of the profit obligation, the current economic growth model and the international reach of business organisations, plus their supply chains and other interactions.
- Then there is the power imbalance between biodiversity and the sectors that threaten it, eg: agriculture and food production, mining, fossil energy, logging etc.

One of the underlying causes of power imbalances is the gradual corporate take-over of public policy-making at the local, national and global level, including through the creation of financial dependencies of public institutions on corporate funding through public-private partnerships and other forms of blended finance. As analysed by the Global Forest Coalition, such financial dependencies and power imbalances form a significant obstacle to removing subsidies and other perverse incentives and taking decisive action to conserve biodiversity in general. The trend towards increasing dependence of public biodiversity policy on private sector financial support should be halted and reversed. Therefore to expect people to be able address consumption problems without the support of strong regulation of production and consumption is impossible. National and international regulation to protect people, biodiversity and climate from the negative impacts of the current economic model is fundamental, yet currently it is still lacking.

iv. Absence of regulation must be addressed

It is therefore vital to ensure that: GOVERNMENTS are able to regulate BUSINESS AND FINANCE - taking into account the specific rights and needs of women, Indigenous peoples, and other rightsholder groups like peasants and youth - and that they actually do so. This must be done in the interests of PEOPLE AND SOCIETY everywhere – which should anyway be the primary responsibility of governments. This demands cooperation between governments internationally as well as within states at regional and sub-regional levels.

However, this is very difficult because of:

- The power accumulated by business and finance over the last few decades based on the global economic growth system and its supply chains.
- The steady weakening and corruption of governments globally, the burden of debt on many governments in the global south, as well as the gross inequities between global North and South and within countries.

Yet, if we do not tackle this core issue, we cannot hope to address the forces that are destroying biodiversity, driving climate change, destroying soil and freshwater systems and thus steadily undermining the life support systems on which human life depends.

We also need to **include people/society more directly and actively in discussing such fundamental changes**, using processes of **democratic deliberation such as citizen assemblies** to develop ideas for addressing the core issues. See <https://www.citizensassembly.ie/en/>. A major aspect of the first process carried out in Ireland is that the government committed itself in advance to holding a referendum on the outcomes of the Assembly and to implementing them if indicated by the referendum. This actually took place and the government honoured its commitment.

v. Financialisation of nature

The drafts tend to define **biodiversity as a market commodity for trading** by using terminology such as **Biodiversity metrics and values**. Language such as **voluntary standards** or plans is also worrying; we need action to be mandatory, or unfortunately it probably won't happen. **Certification** is not a reliable mechanism, as we should have learned from previous experience, eg: Round Table on Sustainable Palm Oil: <https://eia-international.org/news/consumers-are-still-unable-to-trust-sustainable-palm-oil-watchdogs-seal-of-approval/>. Although offsetting is not mentioned by name in the draft LTAM, it is in the draft Action Plan. Moreover there are many references to **net impacts/net positive impacts**, which implies the use of offsetting. It is particularly disturbing to see how there are currently efforts to exploit biodiversity to provide climate offsets and so avoid immediate reductions in emissions.

Use of the term ecosystem services rather than ecosystem functions is also unacceptable because: the word services suggests that only those which are 'useful' to human beings are important, whereas there are many ecosystem functions that are not well understood but are vital. We also note that there are moves afoot to set up Natural Asset Companies designed to trade in ecosystem services, which would be an ultimate form of financialisation of biodiversity.

It is also important to realise that the terms **multi-stakeholder dialogue / platforms** are problematic, since, according to Harris Gleckman, **the development of multistakeholderism poses a challenge to both multilateralism and democracy**. (<https://www.routledge.com/Multistakeholder-Governance-and-Democracy-A-Global-Challenge/Gleckman/p/book/9781138502130>).

The current draft LTAM is therefore deeply flawed at every level and needs rethinking. Thus the Action Plan is similarly flawed, since it is based on the same structure and assumptions and even takes those assumptions further.

vi. What would the right kind of LTAM look like?

Such an LTAM and related Action Plan would link, not separate as now, the 3 sectors: government, business and society, by clearly making government responsible for protecting people/society and biodiversity (fundamental to our life-support system) from over-exploitation and over-consumption promoted by business for profit through addictive foods, advertising etc.

They would make it clear that government must be responsible for this, not dominated by corporate interests to the detriment of people and biodiversity.

Government would therefore be obliged to regulate business, over-consumption and exploitation. In the current situation, where business is so powerful, in the context of an economic system based on endless growth, that is a huge challenge.

Business would be legally obliged to reveal its dependencies and impacts on biodiversity, and to pull back from harmful projects, whatever the impacts on profits. Not doing so would attract sanctions at national and international level. The application of **strict liability** rather than **due diligence** would be vital. The all-pervasive use of advertising and its increasing personalisation and the encouragement of addiction to salt and sugar etc, would also be regulated at national and international level.

Claims that novel technologies could enable business and government to bypass the need to reduce impacts on biodiversity would not be acceptable.

Moving back from breaching planetary boundaries would be a primary concern for the development of a new economic model for the future. Such a model would not be based on perpetual economic growth but on the fair and equitable sharing of benefits and care for the functions (we do not call them services because their 'purpose' is not just to serve human beings but all life) of all ecosystems.

The application of the principles of precaution and common but differentiated responsibilities (CBDR) would be fundamental, along with the obligation for the polluter to pay the costs of any pollution they cause, as opposed to the victims of that pollution, as is now the case.

vii. Corporate structures and rights

Companies that provoke destruction of biodiversity would be made accountable at national and international level and would face the risk of being closed down if they did not comply. This is vital since we need immediate action on the biodiversity crisis. The current structure of companies that **prioritises the return of a profit to shareholders** should also be examined, since it first arose without democratic deliberation of any kind. See <https://www.econexus.info/publication/who-is-in-charge> for a brief history of how the modern corporation arose: "The consequences of granting freedoms to fictitious persons who existed only to make profits, was never discussed."

Pension funds invest mainly in private equity, real estate, infrastructure, and securities as well as stocks and bonds. This makes them an important area to examine for their impacts on biodiversity, agriculture, land-grabbing.

Governments need to work at subnational, national and international level to address negative impacts on biodiversity and they need extra resources in order to do so effectively.

No other considerations should be allowed to interfere with the protection of biodiversity: Parties should not be able to claim priority for trade agreements for example except insofar as they provide special differential treatment for developing countries. The same is true for subsidies: while we still need to identify more perverse subsidies or measures that are their equivalent, subsidies that support eg: the poor, fisherfolk, small farmers must be maintained.

All this is vital because, if we do not take the protection of biodiversity and ecosystem functions seriously, we risk rendering the planet uninhabitable for our species and many others.

Biodiversity can never be mainstreamed successfully while the demand for timber, minerals and agricultural products is stronger than the 'demand' for biodiversity, on which we are so dependent, that we cannot (for the most part) even begin to recognize how central it is to our life support system.

However, attempting to address the problem by giving commercial values to biodiversity is not a solution to its ongoing fragmentation and destruction. Real change demands a paradigm shift away from our current economic model and system of 'values'.

In fact what we most deeply need is a **shift from linear thinking to systems thinking**, as described by Donella Meadows in her seminal book: **Thinking in Systems**. Her previous co-authored book **Limits to Growth** also provides vital lessons that are even more important now, as we still continue with the same economic system, based on limitless growth already in breach of several planetary boundaries.

However, moving towards a new paradigm while still stuck in the old one is very difficult because it requires such major changes in approach and understanding. That is one of the core challenges we face.

viii. Action plan for the long-term approach to mainstreaming biodiversity

We are not commenting at length on this, because we feel that the LTAM needs thorough revision and restructuring first, to then be followed by preparation of a new draft action plan, and thus we do not spend much time on the Action Plan at this point.

We would however, like to point out that the Plan currently contains even more problematic suggestions and terminology than the LTAM itself, which is not surprising considering the membership of the ECN in particular and the untransparent manner of its devising. We note a list it contains that reveals just some of the powerful business platforms and coalitions now involved in the CBD and the mainstreaming process:

Platforms and coalitions that are registered with CBD initiatives, such as the GPBB, Action Agenda, and regional/national platforms. World Economic Forum, World Business Forum for Sustainable Development, sectoral and trade associations in all sectors (International Council on Mining and Minerals, International Petroleum Industry Environmental Conservation Association, Global Concrete and Cement Association, Cross-Sector Biodiversity Initiative, Union for Ethical BioTrade, Friends of Ocean Action, Food and Land Use Coalition).

A major problem with many of these platforms and coalitions and individual member companies, is related to **conflict of interest, which urgently needs to be addressed right across the CBD, not simply in relation to expert groups.**

We also note problematic terminology that is contained in the action plan, but does not always appear in the LTAM itself, such as:

These reveal that the 'biodiversity metrics' and financialisation of nature, offsets and other net mechanisms, voluntary commitments, PES and multi-stakeholderism are meant to be central to this vision of mainstreaming. The use of such approaches will not halt the ongoing destruction of biodiversity, fundamental to planetary life support systems and the survival of future generations.

Chartered Institute of Ecology and Environmental Management

Overall, the Action Plan is a very positive step forward which is welcomed by CIEEM. We consider that developing strict and challenging target dates for milestones will be a key success factor, given the lack of achievement of previous rounds of biodiversity targets. We note that, so far, the action plan contains milestones for actions (what parties will have done) and not outcomes (effects on biodiversity). We consider that linking the plan to clear improvements in biodiversity is essential such that the plan can be modified (targets brought forward, measures made more stringent) if it is clear that biodiversity loss is still increasing. This must be a living and adaptive plan, reviewed annually, if we are to avert the worst effects of the biodiversity crisis.

Friends of the Earth International

i. General Observations on the LTAM

- a) The post 2020 framework needs to ensure humanity operates within a safe space regarding the planetary boundaries. The model of continued economic growth is not compatible with the planetary boundaries on a finite planet. The business model of growing revenue and profits is part of the economic growth model. In order to ensure wellbeing for all humans, there needs to be planetary health, and social justice. The economy can only operate within this. An economy that destroys the basis of living, the environment, is destructive for humanity, and therefore self-destructive. The economy is only good in as far as it serves a purpose for people to real and long-term wellbeing. This should be the basis of how the LTAM is elaborated.



- b) The LTAM should emphasise policy coherence a lot more. This should be done both at national and at international level.
- Regarding the national level, the CBD should call for governments to establish a “whole government” approach for biodiversity, whereby each ministry takes biodiversity and environment as a main guiding principle, and whereby heads of government take commitment to bring these issues to the highest levels of attention in all decisions, thereby ensuring policy coherence.
 - Regarding the international level, this implies that the CBD should make sure biodiversity considerations get taken on board by all other intergovernmental bodies.
 - In no case should economic agreements or treaties be a reason to stop environmental regulation
- c) Stakeholders such as business, or organisations representing business, generally speaking have the objective to maximise profit, sales, and access to resources.

These objectives will generally not coincide with the objectives of the convention. We should therefore not give such stakeholders the same type of possibility to contribute to CBD decisions, and collaboration with them should be established with extreme caution. Absolute transparency on their inputs and ways of participation is needed.

- d) The CBD is a multilateral, and therefore state-based organisation. It's the Parties that make commitments, and are responsible for the implementation. It's not the role of the CBD to organise business so they can implement better environmental policies.

Transferring the responsibility of environmental regulation from governments and the overarching multilateral agencies to business and their sectoral organisations, runs the risk of effective weakening of policies, something which is already visible in practice.

- e) A Rights Based Approach will be very important for the LTAM, yet unfortunately it is near-absent from it.

Yet, it has been demonstrated that Indigenous Community Conservation Areas are the best way of protecting natural areas. Often these areas come under threat of corporate actors, who wish to have access to resources from this area.

IPLCs in these cases often do stand up to defend these natural areas and undergo all kind of human rights violations. The approx. 200 environmental defenders being killed every year are only the tip of the iceberg of all human rights violations in defense of the environment.

If we want to mainstream biodiversity, we also need to mainstream human rights, and especially so in relation to business actors.

- f) Business is a real driver for technological innovation, which in some cases is good and in others not. Many technologies have historically shown to have severe environmental impacts – think plastics, asbestos, pesticides, ... the list is infinite. The assessment to see if new technologies being proposed by business are safe for the environment should be an important chapter of the LTAM. We can't afford to implement a new technology if it later turns out to have severe impacts on our already very vulnerable environment and should therefore apply the precautionary approach.
- g) The LTAM strategic areas contain many important aspects. Yet, at the level of proposed resources and tools for Parties to implement their national targets, we see that many of the elements are voluntary measures and see a lack of proposals for real policies. Yet, only stringent legislation, and proper implementation, which includes sanctions, will effectively turn the tide of the ever-growing impact of business on the environment.
- h) The LTAM framework mentions the specific economic sectors only very few times. Yet, in order to mainstream biodiversity, the CBD and the parties will need to pay in-depth attention and work to each of those sectors and address all the impacts they are causing to the environment. Also, the accumulative impact of the different sectors together needs to be considered. Work-programs for each specific sector should be set up. The mainstreaming decisions of COP 13 and 14 are hugely insufficient to counter the impact of the sectors they attended.
- i) Offsetting, no-net-loss strategies, Nature based solutions, and Nature-positive approaches are mainly strategies that allow business to still execute the projects they wish, even if the environmental impacts are unacceptable. By (promising) offsetting, they disclaim the responsibility for the real environmental impacts. We can't afford to lose more nature. On the contrary, we need to protect all what is left, and do restoration on top of that - not in compensation of more destruction.

Offsetting either protects another natural area, in which case it actually is presupposing that without the protection this area would be lost. Protection of such areas should happen without this being an offset.

Either offsetting is done through restoration of lost ecosystems. In this case, it must be noted that there is a considerable time-lapse between the environmental destruction in one site, and the restoration in the other. Also, restoration doesn't always effectively happen, and is never of the same quality as pristine nature.

International Indigenous Forum on Biodiversity (IIFB)

i. Additional considerations

Please provide comments or suggestions on other aspects, for instance on the introduction to the long-term strategic approach, any gaps, or other complementary aspects, taking also into account the aforementioned elements of decision 14/3.

ON CBD/SBI/3/13

- a) In document CBD/SBI/3/13: Section V Suggested Elements of a Draft Recommendation, para 5, we want to add a reference to the LBOs when mentioning the of report function:
- b) *Invites* Parties and other Governments, international organizations and initiatives, indigenous peoples and local communities, business and civil society organizations, as well as other stakeholders, to report their good practices, lessons learned, and other relevant experiences in implementing the long-term strategic approach and its action plan, as part of their national reports and **Local Biodiversity Outlook**;
- c) For the long-term strategic approach to mainstreaming biodiversity in Document CBD/SBI/3/13, Annex II, para 4:
- d) 4 a) “Address the pressures on biodiversity and the indirect or underlying drivers of biodiversity in decline, in line with recommendations such as those **from the second edition of the Local Biodiversity Outlooks**, Global Assessment Report on Biodiversity and Ecosystem Services,...and from the fifth edition of the Global Biodiversity Outlooks, prioritizing **actions to address the increasing pressures on the lands and territories of Indigenous peoples.**”
- e) Document CBD/SBI/3/13, Annex II, Para 6, Action 1.3 under Strategy Area I Mainstreaming biodiversity across government and its policies:
- f) “Governments at all levels implement integrated spatial planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through voluntary or regulatory plans, and innovative policies and programmes related to economic sectors affecting biodiversity loss, respecting the mitigation hierarchy and striving towards net positive impacts.”
- g) Document CBD/SBI/3/13, Annex II, Para 6, Actions 2.1 and 2.2 under Strategy Area I: Include consideration of the UN Declaration on the Rights of Indigenous Peoples for:
- h) Action 2.1 “Prohibit, in key economic sectors, forms of incentives, including subsidies, that are harmful for biodiversity, including by redirecting them to biodiversity-positive activities, eliminate subsidies that contribute to illegal biodiversity-harmful activities, and refrain from introducing new such subsidies, taking into account national socioeconomic conditions, and consistent and in harmony with the Convention and other international obligations, **including the UN Declaration on the Rights of Indigenous Peoples.**”

Action 2.2: “Develop, strengthen and apply positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations, **including the UN Declaration on the Rights of Indigenous Peoples.**”

United Nations Environment Programme – World Conservation Monitoring Centre

i. Overall comments from UNEP-WCMC

Our comments range across the text of both LTAM and Action Plan, and as a result they are better placed here than in the tables above. We hope you will find the comments useful. We are happy to discuss any of this further if you wish.

- a) We think that this further review of the LTAM and its Action plan should be taken as an opportunity for further simplification of document, and for ensuring that it better reflects the language and framing of the draft 2020 global biodiversity framework and its monitoring framework insofar as this is possible at this stage. The post-2020 global biodiversity framework and LTAM and its

Action Plan still don't quite speak to each other in a coherent way. We remain concerned that we are not seen as creating two different processes – it is essential that the LTAM and its Action Plan are clearly seen as supporting/facilitating implementation of the post-2020 global biodiversity framework. We feel that this needs to be better reflected both in the framing and through the language used.

- b) The LTAM preambular text refers to the 2030 Agenda for Sustainable Development, and the Action Plan (Action Area 1, Action 1.2, proposed activity 1.2.1.) makes links to align CBD, UNFCCC and UNCCD components related to SDGs. This is good to see, but in much of the rest of the LTAM and its Action Plan the links are not made sufficiently strongly or clearly. Again, this risks the LTAM and its Action Plan being seen as somehow separate from the post-2020 global biodiversity framework, which we do not think would be helpful.
- c) With respect to terminology, there appears to be still quite a bit of inconsistency in the use of definitions and certain terms or phrases. For example, terms such as “environmental and social Strategic Environmental Impact Assessments” (the LTAM Action Plan - Action Area 1, Action 1.1, proposed activity 1.1.1.) may mean different things to the government and public sector and to the business and private sector. The business and private sectors are more used to the term “Environmental Impact Assessments (EIAs)”. This is just one example but there are many areas in the LTAM and its Action Plan where it may be important to clarify the terms used.
- d) The LTAM and its Action Plan could emphasize further what brings about transformative change with respect to the role of business and the private sector. What is needed is to encourage the private and business sector to take the lead on this and involve as many stakeholders and actors as they can – i.e., leave no stakeholder behind. Based on our experience of working with business and the private sector, we feel many are prepared to play their part and understand what is required. However, success will depend on governments making the playing field level and setting rules to which all businesses adhere. This needs to come out quite strongly in LTAM and its Action Plan. We also need to identify this as a learning process for both government and the business and private sector.

ii. Please comment for instance on the proposed scope of the interventions. If possible, identify responsible agencies or partners.

In terms of responsible agencies or partners for many of the interventions in the LTAM and its Action Plan, UNEP-WCMC could contribute to many of the suggested actions and interventions, in areas such as economy transformations, nature and trade, targets and metrics for business, nature indicators, natural capital accounting approaches, spatial planning, national ecosystem assessments, and nature restoration, amongst others. Additionally, our experience working across the Rio conventions could help to bring together biodiversity, climate change and land degradation agendas.

For example, under **Headline actions 1-4** UNEP-WCMC could contribute. We understand Natural Capital Approaches (NCA) are critical to the four Headline Actions in the LTAM and its Action Plan. Our work on Natural Capital Approaches aims to mainstream nature into economic and development decision-making. We develop and provide tools, advice and expertise to overcome the barriers to the widespread adoption of natural capital approaches at national, subnational levels and within the private sector. We also create synergies between our work on natural capital approaches with our science-based mapping and modelling work, and our work on ecosystem assessments. For a lot of our public sector work on Natural Capital Approaches, we use the System of Environmental-Economic Accounting as a framework for organising information on natural capital and the relationship between the environment and economy.

UNEP-WCMC also provides thought leadership and crucial insight, empowering governments and the private sector to take action for a nature-positive economy. Through tools like ENCORE (<https://encore.naturalcapital.finance/en/about>), UNEP-WCMC helps organisations across the economy and economic sectors to understand how they depend on nature, the risks they face as a result of biodiversity loss and the potential to address this. Specifically, through tools like ENCORE, we support central banks and financial regulators to understand exposure to systemic nature related risks at the country level, and we also work to understand the impacts of changes in nature on the wider economy.

Action 1.1: Governments at all levels systematically apply strengthened biodiversity assessment, valuation, and accounting tools and methodologies for biodiversity mainstreaming, and use results to inform decision-making.

Business for Nature

Action 1.1: Governments at all levels systematically apply strengthened biodiversity assessment, valuation, and accounting tools and methodologies for biodiversity mainstreaming, and use results to inform decision-making.

This action is important for business, because it will support their contributions to the implementation of Target 15. All proposed activities are good and relevant, provided that the national biodiversity metrics that are the outcome of these actions are available for business in a contextual way and at spatially relevant levels.

Proposed activities: 1.1.3 Develop and implement nature and biodiversity reporting and implement ecosystem or natural capital accounting using the SEEA-framework as part of national accounts to inform decision-making and implementation.

Possible milestones: Produce adequate national metrics that are accessible for all actors in a way that is contextual and spatially relevant for them, at least at a landscape level, to track progress on the Sustainable Development Goals by assessing and accounting for their impacts and dependencies on nature.

Actors: Parties, in collaboration with national statistical offices; UNCEEA to provide global guidance, and to continue its collaboration with business to align public and private natural capital accounting.

Comments: Action 1.1.3 is crucially relevant for business, as the implementation of the UN SEEA-EA Framework will help to deliver standardized national datasets on natural capital, that can be used by business to implement Target 15 of the Post-2020 GBF.

Proposals: **ADD** a call to governments to align public and private natural capital accounting, by aligning the implementation of SEEA Ecosystem Accounting with business applications and by ensuring accessible national natural capital data that is contextual and spatially relevant for business at least at a landscape level.

Proposed activities: 1.1.4 Implement capacity building and other supportive action by relevant national and international organizations and initiatives.

Possible milestones: By 2022, relevant national and international organizations and initiatives initiated enabling measures for applying strengthened assessment, valuation, and accounting tools and methodologies, as well as for promoting the use of national metrics by all stakeholders, including business, and use results to inform post-2020 capacity-building strategies and action plans.

Actors: Regional, national, subnational/local and international organizations/-initiatives, especially National Statistical Offices (NSOs), responding to needs of all stakeholders, as identified by countries.

Comments: Action 1.1.4 has a direct relevance for business, as it will help bridging the knowledge gap in the public sector.

Proposals: **ADD** the need to promote the use of national metrics by all stakeholders **IDENTIFY** National Statistical Offices as key actor.

EcoNexus

Headline action 1

Comments: Ecosystem approach vital: also proper interpretation of biodiversity values, to exclude financial valuation. However, all this is merely wishful thinking while we have the current imbalances and inequities and while the **interests of business in ensuring economic growth and profits** dominate the picture.

If governments cannot or will not act strongly to prioritise ecosystems, as the providers of our life support (soil, water, living organisms, ecosystems such as forests), and as a major regulator of climate change impacts, we are headed for disaster.

We have to stop behaving as though merely tweaking our current economic system will protect us from our own impacts. We must also cease prioritizing our current destructive model of development over all other considerations: biodiversity, climate, justice and equity etc.

Justice, equity, human rights, gender issues must all be fully addressed.

Simply pledging to ‘protect’ 30% is not sufficient, especially since setting up such protection/protected area status has been clearly shown to involve the expulsion of IPLCs in the past.

Spatial planning can actually encourage offsets, and, with nature-based solutions plus so-called ‘net-positive actions’ can basically mean using biodiversity to delay action on climate.

What we are currently doing is **interpreting biodiversity in economic terms** rather than looking at the economy’s dependence on and threats to biodiversity, eg: we are ignoring the issue of planetary boundaries, already breached, and issues of telecoupling as well. The System of Environmental-Economic Accounting (SEEA) is a good example of this approach and it will not protect biodiversity and ecosystems. Use of the SEEA is yet another way to interpret biodiversity impacts and dependency in economic terms, rather than subjecting economic models to planetary life support systems.

Countries will need to act concertedly to address global issues of biodiversity loss and climate change, which do not respect state boundaries.

Proposals: Action Area 1: Alternative proposal

Governments regulate at local, national, regional and international level to ensure that damage to and destruction of biodiversity and ecosystems everywhere is halted, in close cooperation with IPLCs, smallholder (peasant) farmers and fisherfolk, applying the principles of the Ecosystem Approach^[1]

^[1] See decision V/6, <https://www.cbd.int/ecosystem/>.

Friends of the Earth International

<p>Headline Action: Strategic Action area 1</p> <p>Comments: “Values”: though the definition of multiple values is good, in practice, the measurement of this comes down to economic valuation, which has serious negative implications. “spatial planning”: In many countries spatial planning has lead to negative results, as decision making comes top-down, gives priority to those with economic power, and gives the possibility for offsetting. Planning needs to be participatory for it to work</p> <p>Proposals: Action area 1: Fully integrate ecosystem and biodiversity values considerations into national and local planning, development processes, poverty reduction strategies and accounts,^[1] integrating spatial participatory planning and applying the principles of the ecosystem approach.</p> <p>^[1] Sustainable Development Goal 15, Target 15.9, with an updated timeline (2030 instead of 2020).</p> <p>Headline action 1.1</p> <p>Comments: Valuation, and accounting tools: economic valuing of nature undermines the recognition of the real intrinsic value. Any for-profit project which shows a higher valuation than the assigned economic value of an ecosystem or area of biodiversity-rich land would “win”, while the intrinsic value is a lot higher.</p> <p>Proposal: <i>Action 1.1: Governments at all levels systematically apply strengthened biodiversity assessment, valuation, and accounting tools and methodologies for biodiversity mainstreaming, and use results to inform decision-making.</i></p> <p>Proposed activity (1.1.1)</p> <p>Comments: “considerations”: need to take into account the intrinsic value of nature, and the contribution of natural areas to staying within planetary boundaries. “Values” risks being implemented in an economical way.</p> <p>Proposals: 1.1.1 Include ecosystem and biodiversity values considerations in, and apply, environmental and social strategic environmental assessments for new policies and environmental impact assessments for investments, such as in infrastructure, water management, and urban development, and use the results to inform decision-making and implementation. Key actors: Governments, in collaboration with relevant rights- and stakeholders, such as indigenous peoples and local communities, women, civil society, with support of bilateral and multilateral development banks.</p> <p>Proposed activity (1.1.2)</p> <p>It is very important that the implementation of this point takes equal attention to all of the multiple values, and does not over-emphasise the economic value.</p> <p>Proposed activity (1.1.3)</p> <p>Comments: This proposed activity seems oriented to value nature economically at a big scale. This leaves behind many of the other values which nature and ecosystems have</p> <p>Proposals: 1.1.3 Develop and implement nature and biodiversity reporting and implement ecosystem or natural capital accounting using the SEEA framework as part of national accounts to inform decision-making and implementation.</p>

International Indigenous Forum on Biodiversity (IIFB)

<p>Headline action 1</p> <p>Comments: This headline action and strategy area and its activities should incorporate diverse biodiversity values, including explicit reference to cultural values.</p>
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Proposals: Action area 1: Fully integrate ecosystem and biodiversity AND CULTURAL values into national and local planning, development processes, poverty reduction strategies and accounts, integrating spatial planning and applying the principles of the ecosystem approach.

Action 1.1: Governments at all levels systematically apply ~~strengthened biodiversity~~ STRATEGIC ENVIRONMENTAL assessment, valuation, and accounting tools and methodologies for biodiversity mainstreaming and use results to inform decision-making.

Activity 1.1.1

Proposals: Include ecosystem and biodiversity AND CULTURAL values in, and apply, environmental and social strategic environmental assessments for new policies and environmental impact assessments for investments, such as in infrastructure, water management, and urban development, and use the results to inform decision-making and implementation.

Key Biodiversity Area Partnership c/o BirdLife International

Headline action 1

Comments: The headline action 1 is comprehensive and we particularly like the emphasis on integrating the results of spatial planning. Supporting text for this headline should emphasise the importance of **linking the targets on mainstreaming with Target 1 on spatial planning** as well as emphasize **the linkages with IUCN Resolution WCC2020 081** (<https://portals.iucn.org/library/node/49220>) which calls on governments to develop spatial plans for biodiversity and *‘incorporate these plans into National Biodiversity Strategies and Action Plans (NBSAPs), and integrate them through cross-sectoral planning across government and non-governmental institutions, using them prior to, and at all stages of, national land- and sea-use planning, to avoid or otherwise minimise negative impacts on biodiversity’* This resolution was supported by 126 governments (100% of governments that voted)

The Nature Conservancy

Headline action 1(valuation)

Comments: Valuation is still relatively poorly developed and is unable to efficiently capture full biodiversity values at scale. In order for valuations to be effective management tools, regulations requiring no net loss/net gain of specific components need to be imposed.

Proposals: Strengthen spatial planning component (1.3) and include development sector-specific policy instruments for key sectors such as agriculture, mining, energy, infrastructure, tourism, etc. to ensure biodiversity is enhanced, or at least not degraded. Require net positive/no net loss for natural habitat and ecosystem services.

Proposed activity (1.1.1)

Comments: EIAs need more than monitoring – need explicit objective tied to GBF outcomes

Proposals: Add net gain/no net loss objective to regulatory requirements.

Possible milestones: Existence of legislation/regulation

Third World Network

Action Area 1

Comments: While action area 1 refers to values and footnotes Decision X/3, paragraph 9(b)(ii) which specifies these as ‘the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components’, there is a risk of reducing

‘values’ to economic value. This runs the risk of only counting nature in terms of economic returns and not protecting ecosystems that may not be deemed as economically valuable when compared to, for example, an infrastructure or extractive project.

Proposals: - Integrate and specifically highlight social, cultural and other values.

- Participatory planning is more relevant than spatial planning as the latter has tended to be executed in a top-down manner, which is neither equitable nor sustainable

United Nations Economic Commission for Europe

Headline action 1

Comments: UNECE MEAs (Conventions and their Protocols) are all to implement sustainable development. They could potentially be used to mainstream biodiversity.

Proposals: Discussing with the Bureaux (the MoP/CoP) the mainstreaming of biodiversity in the Multilateral Environmental Agreements to which UNECE is Secretariat.

United Nations Educational, Scientific and Cultural Organization

Headline action 1

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Fully integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts, integrating spatial planning and applying the principles of the ecosystem approach. Governments at all levels ensure the equitable and fair use of the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities in mainstreaming, and the application of free, prior and informed consent in accordance with national legislation, and engage, incentivize, enable and empower rights- and stakeholders, such as women, youth, and indigenous peoples and local communities, to participate fully, equitably and effectively in decision-making related to mainstreaming of biodiversity.

Proposed activity (1.1.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Include ecosystem and biodiversity values in, and apply, environmental and social strategic environmental assessments applying the Precautionary Principle for new policies and environmental impact assessments for investments, such as in infrastructure, water management, ecological food systems and urban development, and use the results to inform decision-making and implementation.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: By 2025, introduce requisite legislative or regulatory requirements and the capacity to implement and monitor strategic environmental assessments in critical sectors and consistent with human rights and conventions including UNDRIP

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Delete “with support of bilateral and multilateral development banks.” Or alternatively you could add “all donors and funders”.

Proposals: Governments, in collaboration with relevant rights- and stakeholders, such as indigenous peoples, traditional and local communities, women, LGBTQ2S+, civil society, with support of bilateral and multilateral development banks

Proposed activity (1.1.2)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Undertake studies assessing the various values of nature and biodiversity in the national, subnational, regional and local contexts **through participatory engagement**, and make the results available in databases in order to inform impact assessments, decision-making and implementation. **These must go beyond economic value to include intrinsic ecological, genetic, scientific, educational, social, cultural aesthetic and spiritual contributions and values of biodiversity and its components.**

Possible milestones: Changed date from 2022 to 2024.

By 2024, guidelines for the studies in 1.1.2, in all contexts mentioned, are published and made available in databases, and capacity-building options offered.

Proposed activity (1.1.3)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Develop and implement nature and biodiversity reporting, **such as ecosystem or natural capital accounting (e.g. SEEA-framework), and systemic and participatory accounting (e.g., UNEP's True Costs and True Value Accounting, TEEB for Agriculture and Food), formally using those as part of national accounts to inform decision-making and implementation.**

Possible milestones: Produce adequate national metrics to track progress on the Sustainable Development Goals by assessing and accounting for their impacts and **systemic** dependencies on nature

Proposed activity (1.1.4)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Implement **and provide funding for** capacity building and other supportive action by relevant national and international organizations and initiatives **to ensure grassroots, people and biodiversity centered participation and leadership.**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Changed date from 2022 to 2024.

By 2024, relevant national and international organizations and initiatives initiated enabling measures for applying strengthened assessment, valuation, and accounting tools and methodologies, and use results to inform post-2020 capacity-building strategies and action plans **focused on grassroots, people and biodiversity centered participation and leadership in particular Indigenous and traditional communities who have been stewards of biodiversity for millennia.**

Proposed activity (1.1.5)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: **New: Support community-level initiatives to assess and monitor the state of ecosystems integrity and biodiversity by IPLCs and their relevant organizations, in providing essential supplementary information, knowledge and data to guide decision-making on biodiversity.**

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

This will probably need a separate milestones/indicator, something like: Establishment of 'peoples' biodiversity monitoring initiatives at community and national levels

AND

Incorporation of (above) into gov't national assessment, planning and reporting.

University of Cambridge Conservation Leadership Alumni Network

Headline action area 1

Comments: As the term ‘values’ can be interpreted differently, we urge to integrate limits to biodiversity loss, planetary boundaries, and nature’s right to exist alongside biodiversity values into this target.

In addition, a root cause of biodiversity loss is the current economic system that encourages growth based on GDP. An alternative economic system based on planetary boundaries such as the Doughnut economics needs to be considered. UCCLAN believes such an alternative economic system would be the ultimate mainstreaming tool.

Proposals: Action area 1: Fully integrate ecosystem and biodiversity values² into national and local planning, development processes, poverty reduction strategies and accounts,³ integrating spatial planning and applying the principles of the ecosystem approach.⁴

UCCLAN recommends to add an indicator: *By 2026, develop a global alternative measure for wealth that is inclusive to biodiversity and good quality of life, aiming to keep the economy within planetary boundaries, instituting the measure by 2030.*

UCCLAN recommends to Insert before values the word ‘*status*’, so it will read ‘integrate biodiversity status...’ and in 1.1.1 “Include ecosystem and biodiversity status for applying in...” and in 1.1.2 “Undertake studies assessing and monitoring the various values⁵ and status of nature and biodiversity” in order to improve decisions based on evidence and the status of biodiversity and ecosystems. These will need to include red lines for exploitation.

Action area 1.1.4 refers only to tools rather than to refer also to enabling environment and implementation measures. This seems disconnected from the CBD capacity building strategy as well as targets 18 and 19. Need better coherence and linkages to the GBF. Leadership for example is a component that is also needed to develop and apply biodiversity assessment tools, not just to use results of these assessments to inform capacity building.

Proposals: 1.1.4 Implement capacity building and other supportive action by relevant national and international organizations and initiatives

Add an indicator for implementation of capacity-development strategies including leadership, in assessing biodiversity status as well as in developing and informing upcoming action and future capacity development plans.

Proposed activity 1.1.3

Comments: UCCLAN would like to point out that recently 100 scientists^[1] and academics asked the UN to drop sustainable development targets. The scientists argue that we cannot solve current problems with the same ideology that created them. The Sustainable Development Goals (SDGs) are based on an ideology that values material and technological progress and prioritizes corporate interests - where “humanity will balance social, economic and environmental issues to progress materially.

Proposals: UCCLAN believes that not progress on SDGs should be measured, but the impacts and dependencies on nature from production and consumption. In addition to measuring impacts and dependencies, those impacts on nature should be reduced through adoption of less consumption and production and in a more sustainable way.

Possible milestones: Produce adequate national metrics to track progress on the Sustainable Development Goals by assessing and accounting for their impacts and dependencies on nature.-->

Proposals: UCCLAN recommends to add the following indicators.

Number of countries that are using other measures of beyond GDP, such wellbeing economy measures that integrate biodiversity aspects into an economy that is driven by planetary wellbeing rather than economic growth.

Number of countries that recognize nature's right to exist.

^[1] <https://www.independent.co.uk/climate-change/news/un-sustainable-development-failure-b2084034.html>

Action 1.2: Governments enhance policy coherence by establishing effective structures and processes for interministerial and cross-sectoral collaboration and for coordination of programmes and policies related to biodiversity among national, subnational and local governments.

Business for Nature

Action 1.2: Governments enhance policy coherence by establishing effective structures and processes for interministerial and cross-sectoral collaboration and for coordination of programmes and policies related to biodiversity among national, subnational and local governments.

Comments: This is a key action for business, as coherence of policy on climate change, nature loss and social inequality at all levels, will create the level playing field that supports business' contribution to achieve a just transition.

Proposed activities: 1.2.2 Strengthen structures and processes for **mainstreaming nature into all relevant policies, ministries, cross-sectoral and interministerial collaboration, and into all relevant government institutions' mandates**, among relevant government entities at the national, subregional and regional levels, to consider linkages and interconnections between policies, in particular those related to the IPBES nexus areas, and in the design and implementation of NBSAPs and nationally determined contributions.

Possible milestones: By 2022, review **ministerial mandates, interministerial structures, government organization's mandates, including from finance regulators and national statistical offices**, and processes on environment, development and multi-stakeholder participation and identified gaps and opportunities for strengthening coordination.

By 2026, implement strategies to improve cross-sectoral and cross-departmental policies and have established clear internal policies and plans for mainstreaming biodiversity.

Actors: Relevant government entities **and other government institutions, such as finance regulators and national statistical offices**.

Comments: In order to align policies effectively, it is important to not only look at interministerial structures, but also to the mandates of individual ministries and other government institutions, such as finance regulators and national statistical offices

Proposals: **ADD** a specific reference to mandates of ministries and other relevant government institutions.

Proposed activities: 1.2.3 Develop and set effective nature and biodiversity strategies, action plans and targets, aligned with the post-2020 global biodiversity framework, at the subnational and local levels as a part of NBSAPs, and facilitate mechanisms for a regular review of progress in similar ways to those at the national level, building on successive IPBES outcomes.

NEW] Ensure the adoption and effective enforcement of environmental laws and standards, including by providing capacity building to countries worldwide.

Possible milestones: By 2022, identify priority subnational and municipal governments for development of harmonized NBSAPs **that are aligned with Nationally Determined Contributions (NDCs), and National Action Programs (NAPs) to combat desertification.**

NEW By 2025 all Parties have developed national plans for an effective enforcement of environmental laws and standards

By 2025 UNEP in collaboration with relevant UN bodies and Parties has developed and adopted a plan for capacity building for effective enforcement of environmental laws and standards.

Actors: Subnational and municipal government agencies in collaboration with relevant national entities.

NEW Parties and UNEP, in collaboration with other UN bodies

Comments: It is importance to recognize the need for alignment of NBSAPS with other implementation mechanisms.

In order to create a level playing field, a new action should be included that focuses on the adoption and effective enforcement of environmental laws and standards.

Proposals: ADD a reference to NDCs and NAPs.

NEW: ADD a new action with milestones for Parties and UNEP, in collaboration with other UN bodies

EcoNexus

Headline action 2

Comments: Action to reform incentives and subsidies is central: there are many of them and some have not yet been properly identified as subsidies.

There is currently a push to claim that ‘innovative’ technologies, e.g.: geoengineering, synthetic biology and gene drives, can reduce the need for real system change but this is completely unproven and probably flawed.

Industrial agriculture is a fundamental driver of biodiversity loss and climate change and must be strongly addressed in the GBF. Industrial agriculture is damaging at many levels, from the clearance of ecosystems, eg: forest in the Amazon, often through illegal logging, sometimes followed by cattle grazing to complete the process of land clearance and ending with the development of large-scale monocultures of export crops such as GM soy and maize for EU and increasingly for Chinese markets. Projections show clearly that such forest destruction will soon reach a tipping point with remaining forests ceasing to sequester carbon, or emitting it and becoming savannah. This will lead to impacts in distant parts of the world, eg: Western United States, where the impacts of Amazon clearance to date are already being felt. Yet 1,000 sq km of Amazon rainforest was cleared in April 2022. Not nearly enough attention is being paid to the impacts of industrial agriculture in the LTAM, the GBF or the CBD in general.

Other relevant international obligations – if included this must be clarified, as WTO obligations for example, must not be used to water down commitments to biodiversity.

The indicator on government support is acceptable, however the indicator on PES, REDD+ and biodiversity relevant tradable permit schemes is offsetting by other names and not acceptable.

Proposals: Action Area 2. Alternative proposal

Governments work together to reform and regulate fiscal, budgetary, and financial instruments at national and international level to prevent/avoid damage to biodiversity and ecosystems, with particular attention to identifying and eliminating incentives, including subsidies harmful to biodiversity across all sectors, using a whole-of-government approach.

Other comments or proposals: Number of countries that have integrated biodiversity impacts and dependency measurement and values into legislation and national accounting and reporting systems, ~~defined as implementation of the System of Environmental Economic Accounting (SEEA).~~

Use of the SEEA is yet another way to interpret biodiversity impacts and dependency in economic terms, rather than subjecting economic models to planetary life support systems.

Number of countries that have included biodiversity targets within key policy documents, such as National Action Plans to address Climate Change, National Developments Plans, etc., as well as the progress verifiably reported towards these targets.

Proposed activity (x1)

Comments: We are not commenting at length on the Action Plan because we find it highly problematic and find the process by which it was drafted obscure and untransparent. This is the case even though I was a member of the IAG!

Proposals: FIRST the LTAM needs to be commented and revised and THEN a new Action Plan produced on the basis of that in consultation with all Parties.

Please see further comments in our response to question 4 – additional considerations

Friends of the Earth International

Proposed activity (1.2.2)

Comments: Multi-stakeholder platforms have serious problems with power imbalances, whereby IPLCs and other rightsholders have a lot less power, legal understanding and capacities to press their views through, than those with economic stakes. The public interest is very often not well represented

Proposals: By 2024, review interministerial structures and processes on environment, development and ~~multi-stakeholder participation~~ and identified gaps and opportunities for strengthening coordination.

By 2026, implement strategies to improve cross-sectoral and cross-departmental policies and have established clear internal policies and plans for mainstreaming biodiversity.

Proposed activity (1.2.5)

Comments: Destruction of ecosystems and restoration are not a zero-sum game. Destructive activities need to be prevented at all times. Offsetting and “mitigating harm” are not sufficient, and restoration needs to be new and additional.

The mitigation hierarchy more often than not implies that destructive projects are allowed with offsetting, whereas the real answer should be to prohibit them

Proposals: 1.2.5 Apply relevant safeguard frameworks, including the precautionary approach and the polluter pays principle, as appropriate, with a view to avoiding harm ~~and/or mitigating unavoidable harm~~ of proposed developments at the subnational or municipal level, that would lead to a decline in biodiversity, achieving no further loss ~~or net gain~~ of biodiversity and ecosystems.

Possible milestones: Destruction and restoration are not to be added and subtracted. The “net” approach needs to be replaced with an approach of absolute minimisation of biodiversity and ecosystem destruction, and restoration. Both processes need to be made transparent.

Proposals: By 2025, develop specific targets for reducing further loss ~~or net gain~~ and preserving nature, biodiversity and ecosystems at the subnational and municipal levels.

Key actors: “Stakeholders” can have an economic interest in the destruction of natural areas, and should not have an equal space in the decision making about it.

Multi-stakeholder platforms have serious problems with power imbalances, whereby IPLCs and other rightsholders have a lot less power, legal understanding and capacities to press their views through, than those with economic stakes. The public interest is very often not well represented.

Proposals: Relevant government agencies, bilateral and multilateral development banks, ~~in collaboration with relevant stakeholders~~ and as part of a stronger ecosystem-based and multi-stakeholder cooperation approach, as safeguards alone have proven only partially effective.

International Indigenous Forum on Biodiversity (IIFB)

Activity 1.2.4

Comments: This is to be in line with Sustainable Development Goal 11 (SDG 11), where countries have pledged to “make cities and human settlements inclusive, safe, resilient and sustainable”, and more specifically, Target 11.4 aims to “strengthen efforts to protect and safeguard the world’s cultural and natural heritage”.

Proposals: 1.2.4 Build more sustainable cities by revising urban planning, design and construction at all scales, addressing critical needs while conserving nature AND CULTURAL HERITAGE, restoring biodiversity, maintaining and enhancing ecosystems and their services, and reducing climate change

The Nature Conservancy

Proposed Activity 1.2.4

Comments: Nature-based infrastructure component could be strengthened

Proposals: Add text referring to prioritization of the use of nature-based infrastructure for flood/drought resilience, coastal resilience, reduction of urban heat island effect and health benefits in urban environments.

Third World Network

Proposed activity 1.2.5

Proposals: The idea of ‘net gain’ is problematic as this allows for biodiversity offsetting. We suggest deletion of this phrase.

University of Cambridge Conservation Leadership Alumni Network

Activity 1.2.1

1.2.1 National Governments align their CBD, UNFCCC and UNCCD components related to the Sustainable Development Goals in general and to mainstreaming in particular.

Synergies and mainstreaming need to be considered not just with the three Rio conventions but also with the global and regional biodiversity-related conventions. The CBD GBF should also be an umbrella for mainstreaming the rest of the biodiversity-related conventions, in order to mainstream and enhance governmental coherence.

Proposals: 1.2.1 - Add an indicator on review processes for synergies, dissemination and alignment of the biodiversity-related conventions' goals in governmental processes and NBSAPs.

1.2.4 - the indicator for sustainable cities needs to be in a more holistic approach, and not only access to green areas. It could address qualitative elements such as enhancing urban biodiversity, or be merged with 1.2.5

Proposals: 1.2.4 - Add an indicator: quantity (area) and quality (abundance) of urban biodiversity is maintained or enhanced

Number of countries with mechanisms in place to enhance policy coherence (synergies and interlinkages, while minimising negative interlinkages) with national and international policies, including trade agreements, MEAs and SDGs.

Proposed activity (1.2.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: National Governments align their CBD, UNFCCC and UNCCD components related to the Sustainable Development Goals in general and to mainstreaming in particular **respecting the Precautionary Principle, and relevant UN Declarations such as UNDRIP and UNDROP, Indigenous and traditional knowledge.**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Rio conventions have reviewed, ahead of the United Nations Rio+30 Conference in 2022, opportunities to improve coherence on mainstreaming.

By 2025, translate to the national level adopted global targets and indicators informed by **Indigenous knowledge complemented by** science to reverse the loss of nature, and provide direction for actions by business, finance, governments and civil society organizations.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Parties to and secretariats of CBD, UNFCCC and UNCCD; **UNEP, IPBES**

Proposed activity (1.2.2)

Proposals: Strengthen structures and processes for cross-sectoral and inter-ministerial collaboration among relevant government entities at the national, subregional and regional levels, to consider linkages and interconnections between policies, in particular those related to the IPBES nexus areas, and in the design and implementation of NBSAPs, **nationally determined contributions - NDCs, and non-binding compromises and guidelines with nature and biodiversity implications (e.g., CFS Voluntary Guidelines on Tenure and on Food Systems and Nutrition; National Food System Pathways).**

Proposed activity (1.2.4)

Proposals: Build more sustainable cities by revising urban planning, design and construction at all scales, addressing critical needs while conserving nature, restoring biodiversity, maintaining and enhancing ecosystems and their services, **achieving resilient, and inclusive local food systems,** reducing climate change **exposure, and enhancing coping and adaptation capacities.**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, the proportion of urban citizens with access to green spaces is doubled (GBF target 10).

By 2022?, X cities have developed comprehensive plans and policies to integrate urban biodiversity, nature conservation, resilient food systems with the promotion of agroecological approaches in urban spaces.

Proposed activity (1.2.4.a)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Develop sustainable food system territories that protect, and conserve biodiversity, soil and water based on agroecological production grounded in indigenous knowledge

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, the proportion of people with access to sustainably produced local, food has tripled.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Subnational and municipal government agencies in collaboration with relevant entities including small-scale farmers, social enterprises and other with relevant stakeholders and as part of a stronger ecosystem-based and multi-stakeholder cooperation approach, as safeguards alone have proven only partially effective.

Proposed activity (1.2.5)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Apply relevant safeguard frameworks and human rights including the right to land, waters, seeds, genetic and productive resources. Using the precautionary approach and the polluter pays principle, as appropriate, with a view to avoiding harm and/or mitigating unavoidable harm of proposed developments at the subnational or municipal level, that would lead to a decline in biodiversity, achieving no further loss or net gain of biodiversity and ecosystems.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, develop specific targets for reducing further loss or net gain and preserving nature, biodiversity and ecosystems at the subnational and municipal levels. And integrate them into NBSAPs, NDCs and National Food System Pathways and other relevant national processes.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the word “banks”.

Relevant government agencies, bilateral and multilateral development banks—agencies, and rightsholders organizations, in collaboration with relevant stakeholders and as part of a stronger ecosystem-based and multi-stakeholder cooperation approach, as safeguards alone have proven only partially effective, and consistent with human rights and conventions including UNDRIP/UNDROP and the Voluntary Guidelines on the Responsible Governance of Tenure (VGGT).

Action 1.3: Governments at all levels implement integrated spatial planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through voluntary or regulatory plans, and innovative policies and programmes related to economic sectors affecting biodiversity loss, respecting the mitigation hierarchy and striving towards net positive impacts.

Business for Nature

Action 1.3. Governments at all levels implement integrated spatial planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through voluntary or regulatory plans, and innovative policies and programmes related to economic sectors affecting biodiversity loss, respecting the mitigation hierarchy and striving towards net positive impacts.

Comments: This action is important for business as it will promote implementation at local levels.

1.3.2. Proposed activities: Develop and enact policy measures to enable ecosystem and land- and seascape approaches to the governance of natural resources in the agriculture, fisheries and aquaculture and forestry sectors, including spatial planning, supply chain management, permitting and licensing processes for business operations and ecosystem restoration measures at the subnational and municipal government levels.

Possible milestone By 2025, policy measures, **including incentives**, promoting consideration of ecosystem functions and services in agricultural, fisheries and aquaculture, and forestry landscapes are enacted.

By 2025, voluntary **sustainability** certification schemes reflecting the contribution of **to** biodiversity exist for 30% of trade in products and commodities from the agriculture, fisheries and aquaculture, and forestry sectors.

Actors: FAO and its member countries. Subnational and municipal government agencies in collaboration with relevant national entities and in consultation with relevant stakeholders. Indigenous peoples and local communities, small-scale farmers, pastoralists, fisherfolk, foresters and other rural dwellers to provide guidance.

Comments: **ADD** “including incentives” to the first milestone of the possible milestone. **SPECIFY** voluntary “sustainable” certification in the second milestone, as not all certifications cover all essential aspects of sustainability, and specify contribution “to” biodiversity.

Proposed activities: 1.3.3 Develop and enact policy measures to safeguard the livelihoods, rights, lands and territories of farmers, pastoralists, fisherfolk, foresters, other rural dwellers and indigenous peoples and local communities.

Possible milestones: By 2025, enact policy measures safeguarding the livelihoods, rights and territories of small-scale producers and indigenous peoples and local communities as custodians of biodiversity.

Actors: FAO, UNDP, Equator Initiative, UNESCO, Civil society partners, **Food and agriculture organizations**

Comments: **ADD** to actors ‘Food and agriculture organizations’, as they can bring the voice from on the ground practitioner and farmer communities, that are necessary to provide the insights for successful implementation of the policy measures.

Friends of the Earth International

Headline action 1.3

Comments: Spatial planning generally happens top-down, and does not necessary take into account the realities on the ground. Participatory planning is build upon what is really feasible on the ground
Volunatry plans don´t have any real legal meaning
The mitigation hierarchy more often than not implies that destructive projects are allowed with offsetting, whereas the real answer should be to prohibit them

Proposals: *Action 1.3: Governments at all levels implement integrated ~~spatial~~ participatory planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through ~~voluntary or~~ regulatory plans, and ~~innovative~~ policies and programmes related to economic sectors affecting biodiversity loss, ~~respecting the mitigation hierarchy and striving towards net positive impacts.~~*

Proposed activity (1.3.2)

Comments: Spatial planning generally happens top-down, and does not necessary take into account the realities on the ground. Participatory planning is build upon what is really feasible on the ground

Proposals: 1.3.2 Develop and enact policy measures to enable ecosystem and land- and seascape approaches to the governance of natural resources in the agriculture, fisheries and aquaculture and forestry sectors, including ~~spatial~~ planning, supply chain management, permitting and licensing processes for business operations and ecosystem restoration measures at the subnational and municipal government levels.

Possible milestones: Voluntary certification has proven not to improve the situation for the environment nor for the rights of IPLCs.

Voluntary certification is being used to undermine the need for real policies.

Some very good background literature can be found here:

- <https://en.milieudefensie.nl/news/palm-oil-certification-not-out-of-the-woods.pdf>

<https://www.greenpeace.org/international/publication/46812/destruction-certified/>

Proposals: By 2025, policy measures promoting consideration of ecosystem functions and services in agricultural, fisheries and aquaculture, and forestry landscapes are enacted.

~~By 2025, voluntary certification schemes reflecting the contribution of biodiversity exist for 30% of trade in products and commodities from the agriculture, fisheries and aquaculture, and forestry sectors.~~

Key actors: Stakeholders often have economic interests and therefor a conflict of interest between biodiversity conservation and their own profit.

FAO and its member countries.

Subnational and municipal government agencies in collaboration with relevant national entities ~~and in consultation with relevant stakeholders.~~

Indigenous peoples and local communities, small-scale farmers, pastoralists, fisherfolk, foresters and other rural dwellers to provide guidance.

Proposed activity (1.3.3)

Comments: Attention: “safeguards” has in the past more often than not proven to be totally insufficient when there is no institutional follow up, and no sanctions for those who breach the safeguards. This issue needs to be addressed.

Proposed activity (1.3.5)

Comments: Attention:

Lots of awareness and transparency metierials (particularly voluntary certification) are completely inadequate and often provide false information. Such false information should become a liability and be penalised.

Access for citizens to buy in a well-informed way is mostly only accessible to the middle classes, mainly in developed countries. That is considerably less than half of the world’s population.

International Indigenous Forum on Biodiversity (IIFB)

<p>Activity 1.3.1</p> <p>Comments: Include recognition of Indigenous-led conservation and role of IPLCs to lead these actions.</p> <p>Proposals: 1.3.1 “Incorporate biodiversity issues in regional and subregional land and oceanic planning (INDIGENOUS-LED CONSERVATION, connectivity of protected and sensitive areas, areas to be restored, sustainable agricultural and forestry areas...) with emphasis on transboundary ecosystems AND THE LANDS AND TERRITORIES OF INDIGENOUS PEOPLES AND LOCAL COMMUNITIES.”</p> <p>Key actors: Include recognition of Indigenous-led conservation and role of IPLCs to lead these actions</p> <p>Actors: “Relevant national entities, in collaboration with subnational and municipal government agencies as appropriate, AS WELL AS INDIGENOUS PEOPLES AND LOCAL COMMUNITIES”</p>

Key Biodiversity Area Partnership c/o BirdLife International

<p>Activity 1.3.1</p> <p>Comments: <i>‘Biodiversity issues’</i> is a vague term. This activity should more explicitly state that spatially explicit plans for biodiversity (developed under target 1) are used to plan at national, regional, subregional... etc. At present it is becoming similar to Target 1 in language and what is needed is the spatial plans produced under that target used in implementing action here. We believe plans should be used at national as well as regional and subregional scale. While transboundary systems are important we don’t believe the emphasis should be just on these areas.</p> <p>Proposals: <i>Spatially explicit plans for biodiversity developed under target 1, that identify important sites for biodiversity and connectivity required to maintain biodiversity, are used to minimise biodiversity loss by using them to plan at national, regional and subregional levels for land, freshwater and oceans (important sites for biodiversity, their interconnectedness, areas to be restored, sustainable agricultural and forestry areas...) with considerations on transboundary ecosystems.</i></p> <p>Possible milestones: There is no proposed milestone for this activity so we propose one here.</p> <p>Proposals: Number of spatial plans developed under target 1 that are being used across sectors of government</p> <p>Key actors: Government institutions</p>
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The Nature Conservancy

<p>Proposed activity (1.3.1)</p> <p>Comments: Wording of this activity could be more action-oriented by focusing on the revised NBSAPs and requiring their application.</p> <p>Proposals: Ensure regional and subregional planning is consistent with NBSAPs and other biodiversity objectives.</p> <p>Possible milestones: Availability of written assessment/analysis of how NBSAPs were considered in planning processes</p> <p>Key actors: National and subnational authorities</p>
<p>Proposed activity 1.3.4.</p> <p>Comments: Could be strengthened to ensure action</p> <p>Proposals: Add milestone on identifying and ameliorating the activity cause the most significant biodiversity impacts in each priority sector.</p>

Third World Network

Proposed activity 1.3.2

Possible milestones: Voluntary certification schemes are not an adequate enough milestone for policy measures designed to decrease negative and increase positive effects on biodiversity. Compliance with legislative provisions would be a more appropriate milestone

Proposed activity 1.3.3

Possible milestones: Enactment of policy measures to safeguard the livelihoods, rights and territories of small-scale producers and indigenous peoples and local communities alone is not sufficient a milestone. This has to be complemented by evidence of compliance with these policy measures and laws stemming from them, including the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP).

United Nations Educational, Scientific and Cultural Organization

Headline action 1.3.

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Deleted the word “towards”.

Proposals: Governments at all levels implement integrated, **inclusive** spatial planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through voluntary or regulatory plans, and innovative policies and programmes related to economic sectors affecting biodiversity loss, respecting the mitigation hierarchy and striving for ~~towards~~ positive impacts.

Proposed activity (1.3.1)

Comments: Deleted the word “issues”.

Proposals: Incorporate biodiversity ~~issues~~ **considerations** in regional and subregional land and oceanic planning (connectivity of protected and sensitive areas, areas to be restored, sustainable agricultural and forestry areas) with emphasis on transboundary ecosystems.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, policy measures promoting consideration of ecosystem functions and services in agricultural, fisheries and aquaculture, and forestry landscapes are enacted.

By 2025, **regulatory measures and** voluntary certification schemes reflecting the contribution of biodiversity exist for 30% of trade in products and commodities from the agriculture, fisheries and aquaculture, and forestry sectors.

Proposed activity (1.3.3)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Moved the word “rights”.

Proposals: Develop and enact policy measures to safeguard the **rights**, livelihoods, ~~rights~~, lands and territories and **genetic resources** of **small-scale** farmers, pastoralists, fisherfolk, foresters, other rural dwellers and indigenous peoples and local communities, **building on CFS’ Voluntary Guidelines on Tenure**.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Moved the word “rights”.

By 2025, enact policy measures safeguarding the rights, livelihoods, ~~rights~~ and territories and **genetic resources** of small-scale producers and indigenous peoples and local communities as custodians of biodiversity.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

FAO, UNDP, Equator Initiative, UNESCO

Civil society partners

IPLCs

Proposed activity (1.3.4)

Comments: Added the word “agriculture”.

Proposals: Integrate the goals and targets of the post-2020 global biodiversity framework within and across policies targeted at key sectors indirectly affecting biodiversity (e.g. agriculture, tourism, energy and mining, health, infrastructure, manufacturing), for all relevant ecosystems on land and in oceans, to be determined in accordance with national conditions, taking into account cross-sectoral linkages.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, relevant government agencies are integrating biodiversity considerations into **all** existing **and new** development policies.

By 2024, review relevant plans and policies for 3-5 priority sectors, and identify entry points for mainstreaming action, having regard to the IPBES possible actions and pathways to achieve transformative change.

Proposed activity (1.3.5)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Create enabling environments and establish incentives for citizens to achieve sustainable consumption, consumer engagement in nature **protection**, and awareness campaigns at all levels, including through transparency in the composition of products to allow for informed consumption.

University of Cambridge Conservation Leadership Alumni Network

Proposed activity (1.3)

Comments: Action 1.3: Governments at all levels implement integrated spatial planning and management for decreasing negative and increasing positive impacts on biodiversity at landscape, seascape and urban levels, including, as appropriate, through voluntary or regulatory plans, and innovative policies and programmes related to economic sectors affecting biodiversity loss, respecting the mitigation hierarchy and striving towards net positive impacts.

Proposals: UCCLAN proposes to delete “striving towards net positive impacts”

HEADLINE ACTION 2: Mainstream biodiversity in fiscal, budgetary and financial instruments, in particular by eliminating, phasing out or reforming incentives, including subsidies harmful to biodiversity in key economic sectors, by applying innovative technologies, and by developing and applying positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socioeconomic conditions.

Action 2.1: Prohibit, in key economic sectors, forms of incentives, including subsidies, that are harmful for biodiversity, including by redirecting them to biodiversity-positive activities, eliminate subsidies that contribute to illegal biodiversity-harmful activities, and refrain from introducing new such subsidies, taking into account national socioeconomic conditions, and consistent and in harmony with the Convention and other international obligations.

Business for Nature

Action area 2. Mainstream biodiversity in fiscal, budgetary and financial instruments, in particular by eliminating, phasing out or reforming incentives, including subsidies harmful to biodiversity in key economic sectors, by applying innovative technologies, and by developing and applying positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socioeconomic conditions.

Proposed activities: Action 2.1: Prohibit, in key economic sectors, all forms of incentives, including subsidies, that are harmful for biodiversity, including by redirecting them to biodiversity-positive activities, eliminate subsidies that contribute to **legal** and illegal biodiversity-harmful activities, and refrain from introducing new such subsidies, taking into account national socioeconomic conditions, and consistent and in harmony with the Convention and other international obligations.

Comments: This action, that is closely related to Target 18 of the Post-2020 GBF, is crucial for creating a level playing field for business that support business' contributions to achieve Nature positive. However, the language of this action needs to be aligned with that of Target 18. All three actions mentioned are relevant for business.

Proposed activities: 2.1.1 Integrate nature and biodiversity considerations in environmental fiscal reforms (EFR), taxation models and fiscal incentives for achieving the three objectives of the Convention

Possible milestones: By 2022, undertake an assessment of possible (negative and positive) impacts of their fiscal system.

By 2025, identify and disclose (negative and positive) impacts of the fiscal system and develop and adopt plans to shift away from tax policies that incentivize the degradation and over-exploitation of nature and redirect them towards sustainable use, resilience, restoration and circularity.

Actors: Relevant government entities in collaboration with finance ministries, with support from relevant international organizations.

Comments: Identifying EHS is an essential first step and the lack of transparency and disclosure of subsidies was one of the reasons for the failure of the Aichi Targets. Undertaking an assessment only will not be enough. In addition to this there is a need to increase transparency and develop and adopt plans to shift away from taxes with negative impacts on nature.

Proposals: ADD a new milestone on disclosure and development and adoption of plans.

Proposed activities: 2.1.2 Eliminate/redirect incentives harmful for nature and biodiversity in key economic sectors, including harmful subsidies, taking into account national socioeconomic conditions, divesting, as much as possible and as appropriate, investments from subsectors that are intrinsically damaging to the environment, and ensuring that time-bound policy plans are in place to take action on remaining harmful incentives, including subsidies.

Possible milestones: ~~By 2022, review, disclose and shift away from direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature and redirect them towards sustainable use, resilience, restoration and circularity.~~

~~Develop policy plans, in line with revised national biodiversity strategies and action plans (NBSAPs), with prioritized measures, timelines and milestones leading to the eventual elimination, phase out, or reform of identified harmful incentives and/or subsectors.~~

By 2025, Parties have developed plans to identify and reform all direct and indirect subsidies and incentives harmful for biodiversity, by redirecting or eliminating, and ensure that financial savings are channelled to support biodiversity domestically and internationally and positive incentives are scaled-up in harmony with the Convention and other relevant international obligations.

Actors: Government entities at all relevant levels in collaboration with finance ministries, and in consultation with the finance sector and other relevant stakeholders.

Comments: This is a crucial action, as it will deliver a systemic approach to reforming Environmentally Harmful Subsidies and incentives, that is necessary to stop financial support to activities that have unintended negative impacts on biodiversity. These harmful supports should be reformed to incentivize and support actions by businesses that deliver positive long-term outcomes for people, nature and climate through innovative, circular, regenerative and profitable business models. However, the language needs to be aligned with Target 18.

Proposals: Fully change the proposed milestone to be more in line with Target 18.

Chartered Institute of Ecology and Environmental Management

Headline action 2

Comments: Para 2.1.2 Eliminate / redirect

Proposals: Eliminate and redirect

Friends of the Earth International

Action area 2.

Comments: Many innovative technologies are harmful for nature. In many cases scientists only find out what the harmful elements were decades later. We need a precautionary principle for new and innovative technologies, and not promote them as a general policy line

Other relevant international obligations: only in as far as these don't go against biodiversity's interest. I.e. economic agreements, with elements that are harmful for nature should be revised so that there is indeed coexistence, but on the basis of environmental safety for the planet.

Proposals: Mainstream biodiversity in fiscal, budgetary and financial instruments, in particular by eliminating, phasing out or reforming incentives, including subsidies harmful to biodiversity in key economic sectors, ~~by applying innovative technologies~~, and by developing and applying positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socioeconomic conditions.

Proposed Activity 2.1.1.

Comments: An important background read for this is: J.Dempsey et al, Biodiversity targets will not be met without debt and tax justice <https://www.nature.com/articles/s41559-021-01619-5>

Proposed Activity 2.1.2.

Proposals: Government entities at all relevant levels in collaboration with finance ministries, and in consultation with the finance sector ~~and other relevant stakeholders.~~

Proposed Activity 2.1.3.

Comments: The task of the CBD is to guard the environmental stability of the planet, not the financial stability of business and the environmental sector

Proposals: ~~2.1.3 Assess the financial risks arising from biodiversity loss to financial stability under different scenarios of governance.~~

~~By 2025, carry out stress tests on biodiversity related financial risks and opportunities, including on new market opportunities.~~

~~Central banks and/or financial regulators.~~

International Indigenous Forum on Biodiversity (IIFB)

Headline action 3

Comments: This headline action should recognize and support local and small scale enterprises that have low biodiversity impact and encourage conservation and sustainable use of biodiversity, such as those by indigenous peoples and local communities

The Nature Conservancy

Headline action 2 (fiscal policies)

Comments: This presumes that countries have already identified harmful expenditures and subsidies, which is often not the case.

Proposals: Given the challenges of reducing expenditures for entrenched interests, additional focus on **transparency** around harmful expenditures and subsidies would be a more focused approach that might be achievable.

Other comments or proposals: If the GBF core text includes requirement for parties to develop **national biodiversity finance plans**, many of the activities included under these headline actions (especially #2) should be part of developing those plans.

Proposals: Include review of fiscal, taxation, subsidy and incentive policies as part of national biodiversity finance plans (in which case their inclusion in LTAM would be duplicative, so LTAM could focus on implementation of those plans.)

Proposed Activity 2.1.1

Comments: As noted above, this should be part of NBFPs development.

Proposed activity 2.1.2

Comments: This activity is good, but should also be reflected in the core GBF targets

Third World Network

Action Area 2

Proposals: - It is not clear what are the ‘innovative technologies’ that are referred to. We suggest deletion of this phrase.

- The elimination, phase out and reform of harmful subsidies have to be conducted in a just and equitable way in two ways. Firstly, there is a need to recognize the socio-economic contexts of developing countries and ensure that subsidies, to the extent that they benefit marginalised communities, are reformed and coupled with alternatives so as to not disproportionately impact those communities. Secondly, when financial savings are generated from subsidy reform, the resources should be equitably redistributed, especially to those who are conserving and sustainably using biodiversity. These elements need to be included.

Proposed activity 2.1.1

Comments: This paper provides important recommendations with regard to tax reform and debt justice at national and international levels: Dempsey et al. (2021) ‘Biodiversity targets will not be met without debt and tax justice’, *Nat Ecol Evol* <https://doi.org/10.1038/s41559-021-01619-5>

For example, Governments can take action to address illicit financial outflows through international tax cooperation, establish a multilateral mechanism for debt workouts, and put an end to the fiscal-austerity-related conditions in International Monetary Fund (IMF) and World Bank financial assistance.

United Nations Educational, Scientific and Cultural Organization

Headline action 2

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Mainstream biodiversity in fiscal, budgetary and financial instruments, in particular by eliminating, phasing out or reforming incentives, including subsidies harmful to biodiversity in key economic sectors, by applying **scale-appropriate social and** innovative technologies, and by developing and applying positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention, **indigenous knowledge holders** and other relevant international obligations, taking into account national socioeconomic conditions

Proposed activity (2.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Prohibit, in key economic sectors, forms of incentives, including subsidies, that are harmful for biodiversity, including by redirecting them to biodiversity-positive **community-appropriate** activities, eliminate subsidies that contribute to illegal biodiversity-harmful activities **and redirect them towards sustainable use, resilience, restoration and circularity**, and refrain from introducing new such subsidies, taking into account national socioeconomic conditions, and consistent and in harmony with the Convention, **indigenous knowledge holders** and other international obligations **including UNDRIP**

Proposed activity (2.1.2)

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2022, review, disclose and shift away from direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature and redirect them towards sustainable use, **sustainable livelihoods**, resilience, restoration and circularity.

Develop policy plans, in line with revised national biodiversity strategies and action plans (NBSAPs), with prioritized measures, timelines and milestones leading to the eventual elimination, phase-out, or reform of identified harmful incentives and/or subsectors.

Proposed activity (2.1.3)

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, **founded on the Precautionary Principle**, carry out stress-tests **and/or scenario scoping** on biodiversity-related financial risks and opportunities, including on new market opportunities.

Proposed activity (2.1.4)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: **Develop and implement government support impact assessments based on systemic modelling and accounting that observes all different forms of capital impacts - human, social, produced and natural capitals (e.g., UNEP's True Costs and True Value Accounting, TEEB for Agriculture and Food)**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, **government support assessment methodologies observe impacts across different capitals, including natural capital**

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Government entities at all relevant levels in collaboration with finance ministries.

Action 2.2: Develop, strengthen and apply positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations.

Business for Nature

*Action 2.2: Develop, strengthen and ~~apply~~ **increase** positive incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations.*

Comments: This action, that is closely related to Target 18 of the Post-2020 GBF, is crucial for creating a level playing field for business that support business' contributions to achieve Nature positive. However, the language of this action needs to be aligned with that of Target 15.

Proposed activity 2.2.1

2.2.1 Develop and promote the implementation of a set of consistent positive incentives for the conservation and sustainable use of biodiversity, such as payment for ecosystem services, consistent and in harmony with international obligations, including the Rio conventions and other relevant multilateral environmental agreements.

Possible milestones: Undertake national analytical studies that identify opportunities to promote the design and implementation of positive incentive measures.

By 2025, adopt mechanisms and quantifiable indicators to value ecosystem services delivery and reward sustainable natural resources management.

Actors: Government entities at all relevant levels in collaboration with finance ministries, and in consultation with relevant stakeholders.

Comments: Analytical studies will not be enough to create the acceleration that is needed. In addition to that, it is crucial that governments support the development and adoption of mechanisms and standardized metrics to value ecosystem services delivery.

Proposals: **ADD** a specific milestone on adoption of mechanisms and standardized metrics to value ecosystem services delivery.

Proposed activities 2.2.3

2.2.3 Require business to internalize environmental externalities and integrate their impact and dependencies on nature in decision-making, risk management, supply-chain management and external disclosure, and support business in this regard.

Possible milestones: ~~Standardization of metrics, tools and guidance to undertake robust corporate natural capital assessments and accounting. Provision of guidance on nature related financial disclosures.~~

By 2025, Parties have adopted mandatory requirements for business and financial institutions to assess and disclose their impacts and dependencies on natural capital.

Actors: Finance ministries in cooperation with environment ministries.

Comments: This is a crucial action to create the level playing field business needs. However, the language of this action needs to be aligned with that of Target 15 and needs to specify what Parties need to do more clearly

Proposals: Fully change the proposed milestone to be more in line with Target 15

Chartered Institute of Ecology and Environmental Management

Headline action 2

Comments: Para 2.2.2 “Implement sustainable procurement policies to take into account...”

Proposals: *Take into account* is too weak – suggest “Implement nature positive public procurement practices, policies and standards, in accordance with national policies and priorities, consistent and in harmony with the Convention and other relevant international obligations.”

Friends of the Earth International

Proposed activity (2.2.1)

Comments: Payment for ecosystem services: this implies a payment for nature conservation in function of how useful it is to the human economy. Problems with projects in the past have included:

- Groups who used to conserve, stop conserving after PES schemes end, as their mindset around the conservation has changed from intrinsic motivation to economic motivation

Only those projects nearby areas with economic interest in ecosystem services are financed, whereas other conservation needs have not been attended.

Proposals: Develop and promote the implementation of a set of consistent positive incentives for the conservation and sustainable use of biodiversity, ~~such as payment for ecosystem services~~, consistent and in harmony with international obligations, including the Rio conventions and other relevant multilateral environmental agreements.

Key actors: Government entities at all relevant levels in collaboration with finance ministries, and in consultation with relevant ~~stakeholders~~ rightsholders.

Proposed activity (2.2.2)

Proposals: 2.2.2 Implement sustainable public procurement practices, polices and standards, and take into account nature and biodiversity, in accordance with national policies and priorities, consistent and in harmony with the Convention and ~~other relevant international obligations.~~

Possible milestones: Nature Based Solutions, Net-requirements and the Mitigation Hierarchy all imply offsetting.

Offsetting only moves the destruction from one place to the other, and doesn't solve the biodiversity crisis. This is in the "best" offsetting cases. Whereas very often, there isn't any real additionality and actually offsetting implies more loss.

Proposals: By 2022, integrate nature and ~~nature-based solutions~~ into public procurement policies and infrastructure development guidelines and promote ~~net-gain requirements~~ with adherence to the ~~mitigation hierarchy~~ for all major development sectors.

Proposed activity (2.2.3)

Proposals: 2.2.3 Require business to internalize environmental externalities and integrate their impact and dependencies on nature in decision-making, risk management, supply-chain management and external disclosure, ~~and support business in this regard~~

Proposed activity (2.2.4)

Proposals: 2.2.4 Parties create or promote incentives for financial institutions to contribute to a **reduction in biodiversity loss** ~~net positive biodiversity impact.~~

Possible milestones: By 2025, at least X% of financial institutions report a ~~net positive biodiversity impact~~ **a reduction in biodiversity loss**, and already existing tools and methodologies are mainstreamed.

The Nature Conservancy

Headline action 2.2.2

Comments: Revising procurement policies is critical, but integrating NBS into these is challenging due to uniqueness of each project and difficulties comparing costs across NBS vs. traditional projects

Proposals: Prioritize nature-based options in public procurement policies wherever possible by fully accounting for lifetime ecosystem service values when issuing RfPs and selecting projects.

Also, all traditional infrastructure projects should adhere to a robust environmental standard (SuRE, Envision, etc.)

Third World Network

Proposed activity 2.2.2

Possible milestones: In relation to sustainable public procurement of food, the enactment of laws and policies to procure from local agroecological small farmers would not only provide a guaranteed market for such producers, but has positive impacts for biodiversity.

Proposals: Delete references to concepts such as 'nature-based solutions' and 'net gain' as these allow for carbon and biodiversity offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity.

United Nations Educational, Scientific and Cultural Organization

Headline action 2.2

Comments: Included the words "governance" and "accountability".

Proposals: Develop, strengthen, and apply positive **governance and accountability** incentives for the conservation, restoration and sustainable use of biodiversity, consistent and in harmony with the Convention and other relevant international obligations.

Proposed activity (2.2.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Develop and promote the implementation of a set of consistent positive incentives for the conservation and sustainable use of biodiversity, such as **integrating nature and ecosystem-based approaches, and co-governance approaches,** consistent and in harmony with international obligations, including the Rio conventions and other relevant multilateral environmental agreements

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Undertake national analytical studies that identify opportunities to promote the design and implementation of positive incentive measures **that include a blended finance approach to generate positive externalities for communities and nature. Private, public, and commercial finance should be complemented by investments in social movements, advocacy, creativity, policymaking, and time**

Proposed activity (2.22)

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the words “nature-based” and “solutions”

By 2022, integrate ~~nature-based solutions~~ **nature and ecosystems-based approaches** into public procurement policies and infrastructure development guidelines and promote **fair and inclusive** net gain requirements with adherence to the mitigation hierarchy for all major development sectors.

Proposed activity (2.2.3)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Require business to internalize environmental externalities and **impacts of their operations; and to integrate the and dependence on nature in decision-making, risk management, supply-chain management and external disclosure, and support business in this regard.**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Standardization of metrics, tools and guidance to undertake robust corporate natural, **social, produced and human** capital assessments and accounting **including True Cost Accounting, UNEP.** Provision of guidance on nature-related financial disclosures.

Proposed activity (2.2.5)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Pursue and support business and operational strategies grounded in solidarity economy principles, including shared governance and participation of all stakeholders, cost-saving approaches, working with nature, investing in training and dignified work, and values-aligned blended finance.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Measures that include a blended finance approach to generate positive externalities for communities and nature. Private, public, and commercial finance should be complemented by investments in social movements, advocacy, creativity, policy-making, and time.

University of Cambridge Conservation Leadership Alumni Network

<p>Proposed activity 2.2.4</p> <p>Comments: 2.2.4 Parties create or promote incentives for financial institutions to contribute to net positive biodiversity impact.</p> <p>Proposals: 2.2.4 Parties create or promote incentives for financial institutions to contribute to halt biodiversity loss</p> <p>Proposed milestones: By 2025, at least X% of financial institutions report a net positive biodiversity impact, and already existing tools and methodologies are mainstreamed.</p> <p>Proposals: UCCLAN proposes the following words: By 2025, at least X% of financial institutions report a halt of biodiversity loss, and already existing tools and methodologies are mainstreamed.</p>

Action 2.3: Apply innovative digital technologies for mainstreaming biodiversity into planning, development, finance and business, in a way that protects privacy while providing citizens, the private sector and Governments with access to data and information for better decision-making related to mainstreaming

Chartered Institute of Ecology and Environmental Management

<p>Headline action 2</p> <p>Comments: 2.2.3 Milestone target date needed</p> <p>Proposals: Suggest 2023</p>
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Friends of the Earth International

<p>Headline action 2.3</p> <p>Comments: It is not clear what “innovative digital technologies” means. But some options could be very environmentally unfriendly, such as block-chain which has an enormous carbon footprint, or such as digital farming which intensifies the power of the agribusiness, while further undermining agroecological practices.</p> <p>Proposals: <i>Action 2.3: Apply innovative digital technologies for mainstreaming biodiversity into planning, development, finance and business, in a way that protects privacy while providing citizens, the private sector and Governments with access to data and information for better decision - making related to mainstreaming.</i></p> <p>Proposed activity (2.3.1)</p> <p>Comments: “Environmental digital public goods and technologies” needs more clarity and a precautionary approach. E.g. blockchain is sometimes portrayed as a tracking mechanism</p> <p>Proposals: 2.3.1 Design policies and promote the use of environmental digital public goods and technologies to mainstream biodiversity into finance and all economic sectors by transforming markets, supply, trade and value chains, consumer behaviours and decision-making.</p> <p>By 2025, Parties have assessed their capacities for designing policies green innovation and any gaps, and policies and programmes to promote environmental digital public goods and technologies to mainstream biodiversity are known into markets, supply, trade and value chains, consumers and decision-making executives.</p>

Proposed activity (2.3.2)

Comments: There is a need to apply a precautionary approach – both regarding environmental and social impacts for any of such techniques.

Proposed activity (2.3.4)

Comments: Rather than “accountability of groups” it should be regulated what the consequences of negative impacts are, and which liabilities and penalisation this results into.

Proposals: 2.3.4 Increase public access and transparency on the impact of digital technology on biodiversity, enhancing **transparency and** accountability, **including legal consequences for negative impacts** across key stakeholder groups.

Possible milestones: By 2025, ~~partnerships between public, private and non-profit/social innovation agencies are aligned to the post-2020 global biodiversity framework and offer work programmes in execution.~~

United Nations Educational, Scientific and Cultural Organization

Headline action 2

Proposed activity (2.3.4)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Increase public access and transparency on the impact of digital technology on biodiversity, **supporting data access and digital literacy of women, youth, indigenous peoples, smallholders and local communities**, enhancing accountability across key stakeholder groups.

Possible milestones:

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, ~~partnerships between public, private and non-profit/social innovation agencies~~ **supporting data access, transparency and digital literacy** are aligned to the post-2020 global biodiversity framework and offer work programmes in execution.

Strategy area II: Integrate nature and biodiversity into business models, operations, and practices of key economic sectors, including the financial sector

HEADLINE ACTION 3: Businesses in all relevant economic sectors and at all levels, and especially large and transnational companies and those with the most significant impacts on biodiversity, actively transition towards sustainable technologies and practices, including along their supply, trade and value chains, demonstrating decreasing negative and increasingly net positive impacts on ecosystems and their services to people, biodiversity and human well-being and health.

Action for Ecology and People Emancipation

Strategy area 2, headline action 3

“... As representing people from tropical country in Indonesia, as major coal exporting country, we give input on Strategy area 2 :Mainstreaming biodiversity across sustainable business and finance. As coal mining activity and its products is one of the driver of biodiversity loss and also climate change, we are considering that this sector need a stricter policy by using avoiding steps in biodiversity mitigation hierarchy. We wish you have strong spirit always in achieving ambitious goal in biodiversity protection...”

Headline Action 3
Action for Ecology and People Emancipation
Comments: Headline action 3: As coal mining is one of the drivers of biodiversity loss and climate change, stricter policy needs to be imposed on the coal mining industries sectors.
Proposals: Businesses at all levels transition to sustainable production practices, maximizing net positive impacts on nature, biodiversity and human health, applying the mitigation hierarchy, while managing dependencies and avoiding or minimizing negative impacts, over-exploitation and pollution, including in business models and through voluntary standards, labelling and sustainability certification, and provide verifiable evidence of change, such as traceability of biodiversity impacts and transparency in supply chains and ingredients. Fossil fuels industries particularly coal mining should apply avoidance in the mitigation hierarchy and shifting business to green sector.

Chartered Institute of Ecology and Environmental Management

Headline action 3
Comments: 3.1.2 TNFD implementation date missing
Proposals: Suggest 2025

EcoNexus

Headline action 3
Comments
Who is going to monitor and verify the actions and reporting etc? This is a major task that should be paid for but not managed by the companies themselves.
There is no indication of how any of this will be regulated. As noted above, almost all sectors of business are more powerful than biodiversity advocates.
Other agreements Parties have entered into (eg: WTO and trade agreements generally, plus related corporate actions in ISDS or eg: the Energy Charter Treaty), may trump all attempts to protect biodiversity, especially given the international power and reach of business. Merely integrating ‘biological diversity, ecosystems and their values into economic sectors’ does not provide any guarantee of real change... the drivers for economic growth and the obligation to return a profit are always stronger under the present economic system.
Businesses will not implement actions 3.1 and 3.2 without legal obligations to do so and without being answerable for failing to do so.
Also the language here: ‘biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement’, seeks to reduce biodiversity to metrics and accounts. This does not help biodiversity conservation, sustainable use or equitable benefit sharing.

‘Net impact measurement’ is not acceptable because the gravity of the crisis means we now need absolute, not net, reduction of impacts.

Like business, financial institutions are expected to return profits and assist with economic growth. Shareholders expect annual profits. Markets become unstable when economic growth is threatened.

It is essential to address business and finance separately since they have different roles and impacts even though these are interactive and mutually reinforcing. The power of finance is often less visible than that of even the largest corporations, but equally important to address.

For example, the impact of pension funds on land – see for example:

<https://news.mongabay.com/2021/02/trader-cargill-pension-fund-tiaa-linked-to-land-grabs-in-brazils-cerrado/>

<https://grain.org/en/article/6059-the-global-farmland-grab-by-pension-funds-needs-to-stop>

While we certainly need to know how many habitats are lost through private activities, we are skeptical about counting natural habitats restored by this means unless transparent methods of assessing this which are open to comments from all affected and from observers are put in place. Private finance needs to be carefully monitored for its impacts and must be transparent and accountable.

Indicators proposed - comments

Who monitors and verifies all this? This is absolutely vital.

What sanctions can be applied to those who do not carry out actions 4.1-4 or fulfill indicators?

The actions proposed for finance institutions involve a lot of instruments that are little understood and/or highly questionable in their impacts: *‘tools such as green investments, impact loans, blended finance, and parametric insurance’*

Brief definitions of these instruments should be made available here:

Comment: In view of the fact that we expect many more catastrophic natural events going forward, this, in principle, sounds positive, but requires constant careful assessment

Proposals: Action area 3: Governments pass legislation to ensure that businesses in all relevant economic sectors and at all levels, and especially large and transnational companies and those with the most significant impacts on biodiversity, actively **and verifiably** transition towards ~~sustainable technologies and practices~~ **that do not harm biodiversity or IPLCs, smallholders, women, youth, at all levels**, including along their supply, trade and value chains. ~~demonstrating decreasing negative and increasingly net positive impacts on ecosystems and their services to people, biodiversity and human well being and health.~~^[1]

Friends of the Earth International

Original headline actions 3 (for business) and 4 (for finance as a mixed public and private sector). C

Comments: The focus of this Strategic area needs to be “governmental regulation of businesses ensuring the overall business impact doesn’t exceed the local and planetary ecological capacity: this has to be the main focus of the strategic area. This may well imply that certain businesses and sectors need to SHRINK, as their overall impact on the planet is too high.

Sustainable technologies can be important, but need to be thoroughly studies, and made sure there are not more negative side effects than the problem they pretend to solve (as has happened in the past with GMOs, biofuels,...)

Sustainable practices are definitely important

Net positive: compensation measures for negative impacts don’t undo these. This should be visual and transparent.

Proposals: Action area 3: Governmental regulate businesses in all relevant economic sectors and at all levels, and especially large and transnational companies and those with the most significant impacts on biodiversity, ensuring the overall business impact doesn’t exceed the local and planetary ecological capacity, actively transition towards sustainable ~~technologies and practices,~~

including along their supply, trade and value chains, demonstrating decreasing negative and increasingly net positive impacts on ecosystems and their services to people, biodiversity and human well-being and health.

International Indigenous Forum on Biodiversity (IIFB)

Headline action 3

Comments: This headline action should recognize and support local and small scale enterprises that have low biodiversity impact and encourage conservation and sustainable use of biodiversity, such as those by indigenous peoples and local communities

Planet Tracker

Headline action 3

Comments: There should be a strengthening of language around businesses having ultimate responsibility for the issues in their supply chains.

Proposals: Businesses should be prepared to be transparent across the supply chains, e.g. through the implementation of traceability systems across their activities.

United Nations Educational, Scientific and Cultural Organization

Headline action 3

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Businesses in all relevant economic sectors and at all levels, and especially large and transnational companies and those with the most significant impacts on biodiversity, actively transition towards sustainable **scale-appropriate, and social technologies** and practices, including along their supply, trade and value chains **with the goal to localize or stay local especially where global supply chains are not present**, demonstrating decreasing negative and increasingly net positive impacts on ecosystems and their services to people, biodiversity and human well-being.

University of Cambridge Conservation Leadership Alumni Network

Headline action 3

Comments: Action area 3: Businesses in all relevant economic sectors and at all levels, and especially large and transnational companies and those with the most significant impacts on biodiversity, actively transition towards sustainable technologies and practices, including along their supply, trade and value chains, demonstrating decreasing negative and increasingly net positive impacts on ecosystems and their services to people, biodiversity and human well-being and health.

Proposals: UCCLAN proposes the following words: demonstrating a halt in biodiversity loss and increasing positive impacts on ecosystems and their services to people, biodiversity and human well-being and health.

Action 3.1: Businesses apply an agreed set of biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement, integrating the values of biodiversity and their role in business models and ensuring that the values, dependencies and impacts on biodiversity throughout their supply chains are accounted for according to international generally accepted principles and codes of conduct.

Business for Nature

Proposed activities: *Action 3.1: Businesses apply an agreed set of biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement, integrating the values of biodiversity¹¹¹ and their role in business models and ensuring that the values, dependencies and impacts on biodiversity throughout their supply chains are accounted for according to international generally accepted principles and codes of conduct.*

¹¹¹ See decision X/3, paragraph 9(b)(ii): the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components.

Comments: This is a key action as it links directly back to Target 15. All proposed actions are relevant for business. However, some activities need to be updated for progress made by the TNFD, and accompanying actions by governments are needed; without an enabling environment from government, business cannot succeed

Proposed activities: 3.1.1 Develop and use existing biodiversity metrics for business to assess and value their impacts and dependencies on nature, biodiversity and ecosystem functions and services, and include the values of nature into business decision-making.

Possible milestones: By 2025, implement frameworks such as the Natural Capital Protocol to integrate the value of nature in decision-making and global market mechanisms.

Companies from all sectors use agreed measures to inform decision-making and update them in response to new insights.

By 2025 Parties have established programs to support capacity building and business action to develop and implement metrics for assessing their impacts and dependencies on natural capital and committing to science-based targets towards operating within planetary boundaries.

Actors: ~~Natural~~ Capitals Coalition and its partners, such as ~~International Council on Mining and Minerals and International Petroleum Industry Environmental Conservation Association,~~ **World Business Council on Sustainable Development, Science-based Targets Network (SBTN),** United Nations Environment Programme/World Conservation Monitoring Centre, World Business Forum for Sustainable Development, ~~business and their associations,~~ the Value Balancing Alliance, **as well as the Aligning Biodiversity Measures for Business initiative (ABMB), International Council on Mining and Minerals and International Petroleum Industry Environmental Conservation Association,** **companies and financial organizations,** and other relevant organizations.

Comments: Business can take the lead to develop biodiversity metrics, but this must be accompanied by government creating the enabling environment, in part through new regulations (Target 15) and through rethinking of incentive-mechanisms (Target 18), but also by establishing programs to support capacity building and business action to develop and implement metrics.

Actors need to be identified more carefully.

Proposals: **ADD** milestone focusing on role of Parties to develop the enabling environment that supports business.

Also, **ADD** Parties as actor, and **AMEND** the list of actors.

Proposed activities: 3.1.2 Integrate an agreed set of nature and biodiversity considerations into relevant business disclosure and reporting frameworks, ensuring societal oversight of and input into these processes involving women, youth, and indigenous peoples and local communities.

Possible milestones: By 2023 a framework for nature-related financial disclosure is established, with an accompanying plan of implementation.

By 2025 Parties have established programs to support capacity building and private action to implement nature-related financial disclosure.

By 2030, Parties have adopted and implement mandatory requirements for business to assess and disclose their impacts and dependencies on biodiversity.

~~A Taskforce for Nature Related Financial Disclosures, or an expanded TCFD, is set up to develop guidance for business and finance.~~

~~Climate Disclosure Standards Board (CDSB), ABMB, and CDP Forests biodiversity standards reviewed and strengthened.~~

Actors: TNFD, Climate Disclosure Standards Board (CDSB), ABMB, and CDP, Capitals Coalition, businesses, financial institutions and regulators.

Citizen assemblies, or processes for consultation with indigenous peoples and local communities.

Comments: This milestone and the partners need to be updated based on the plans and development of TNFD.

The private sector can take the lead, but this must be accompanied by government creating the enabling environment, in part through new regulations (Target 15) and through rethinking of incentive-mechanisms (Target 18), but also by establishing programs to support capacity building and business action to implement nature-related financial disclosure.

Proposals: **UPDATE** the milestones based on the plans and development of the TNFD, and **ADD** specific milestones for establishing a framework for nature-related financial disclosure by 2023, establishing programs by Parties to support capacity building and private action by 2025, and Parties adopting and implementing mandatory requirements for business to assess and disclose their impacts and dependencies on biodiversity by 2030.

EcoNexus

Indicators

Action 3.1: Governments pass legislation to compel Businesses to report on their impacts on biodiversity, verify these reports and demonstrate that these impacts are decreasing. ~~apply an agreed set of biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement, integrating the values of biodiversity^[21] and their role in business models and ensuring that the values, dependencies and impacts on biodiversity throughout their supply chains are accounted for~~ All this should be carried out according to CBD text and decisions, international ~~generally accepted~~ principles and codes of conduct.

Friends of the Earth International

Headline action 3.1

Comments: It needs to be governments regulating business and taking responsibility
Despite the fact that there is a mention of the multiple values of biodiversity, it is clear that the implementation of working with them has an overarching economic focus, particularly through biodiversity metrics and ecosystem accounts

Proposals: ~~Action 3.1: Governments regulate so businesses to apply an agreed set of biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement, integrating all biodiversity considerations the values of biodiversity and their role in business models and ensuring that the values, dependencies and impacts on biodiversity throughout their supply chains are accounted for according to international generally accepted principles and codes of conduct, and consequently comply to improved regulations~~

Comments: Making business compatible with living within planetary boundaries should not depend on business decision making, but rather on governmental regulation. Then it's down to business compliance with regulations, not to their good-will decision making. The basis must be a wide set of biodiversity considerations, and not just "values" which in a context of business decision making very quickly becomes exclusively economic.

Proposals: ~~3.1.1 Develop and use existing biodiversity metrics for business to assess and value their impacts and dependencies on nature, biodiversity and ecosystem functions and services, and include the values of nature into business decision making.~~

By 2025, develop and implement frameworks to integrate biodiversity **considerations in all decision making** the value of nature in decision making and global market mechanisms

Companies from all sectors use agreed measures to inform decision-making and update them in response to new insights.

~~Natural Capital Coalition and its partners, such as International Council on Mining and Minerals and International Petroleum Industry Environmental Conservation Association, United Nations Environment Programme/World Conservation Monitoring Centre, World Business Forum for Sustainable Development, business and their associations, the Value Balancing Alliance, the Aligning Biodiversity Measures for Business initiative (ABMB) and other relevant organizations.~~

Comments: This is only a very first step – but appears to be the aim. Disclosure and reporting should be the starting point for drastically altering business behaviour.

The agreed set of considerations should be based on compatibility with local and planetary ecological capacity.

3.1.2 Governments regulate to Integrate an agreed set of nature and biodiversity considerations into relevant business disclosure and reporting frameworks, ensuring **governmental and** societal oversight of and input into these processes involving women, youth, and indigenous peoples and local communities.

~~Businesses, financial institutions and regulators.~~

Citizen assemblies, or processes for consultation with indigenous peoples and local communities.

It should be up to IPLCs, civil society, citizens assemblies and representative governments to define what are the best parameters for reporting and disclosure and further action upon the elements defined.

IPIECA

Proposed activity 3.1.1

Comments: Emerging metrics e.g. TNFD and the GRI Biodiversity Standard are focusing disclosure requirements on risks and impacts to biodiversity and nature, but they do not provide disclosure requirements on biodiversity or nature **value**.

Values of Biodiversity cover the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational, and aesthetic values of biological diversity and its components. Assessing values biodiversity through all these aspects does not seem realistic. Suggest narrowing down scope.

Proposals: Adjust wording and milestones to improve alignment with frameworks and remove reference to 'value of nature'.

Suggested wording:

Develop and adopt science-based and practical biodiversity metrics for business to assess risks and impacts on biodiversity and nature as well as dependencies on ecosystem services.

Possible milestones: The milestone timeframe (by 2025) is not aligned with the proposed TNFD timeframe. TNFD proposes that implementation should be complete "after no more than 5 years". Given the final TNFD framework is scheduled to be released in 2023, the deadline would be 2028.

Should include a milestone for setting acceptable metrics

Proposals: Align milestone timeframe with frameworks.

Key actors: The list is incomplete and a bit confusing.

Suggest splitting into: 1) Actors developing the frameworks and 2) Actors implementing the frameworks.

1) should include TNFD, GRI, SBTN Align (supported by WCMC, UNEP, WBCSD, Capitals Coalition, IUCN (STAR metric), World Economic Forum (WEF), think tanks (e.g., Planetary Boundary), etc.). 2) should include ICMM and IPIECA.

Note that IPIECA is no longer using its full name and acronym (International Petroleum Industry Environmental Conservation Association).

Proposed activity 3.1.2

Comments: There are two separate activities that could be misinterpreted as currently worded.

Proposals: The first activity is the development of frameworks by TNFD, GRI, etc. and an engagement and consultation process that ensures societal input (not oversight) as described.

The second activity is the integration of the frameworks into business disclosures consistent with those frameworks (once completed).

Possible milestones: Suggest to also align with ongoing EU initiatives.

There is a need for a timeframe for this milestone.

Proposals: Add a timeframe e.g. by 2023.

Key actors: There should be different actors listed for the framework development/consultation and the integration.

Proposals: The actors for developing the frameworks are TNFD, GRI, etc. (see above) plus consultation partners.

The actors for the integration of the frameworks are businesses and industry organizations such as ICMM and IPIECA).

Note that IPIECA is no longer using its full name and acronym (International Petroleum Industry Environmental Conservation Association) and is rebranded to IPIECA.

Planet Tracker

Action 3.1.

Comments: In Action 3.1, the framework suggests that business should apply an agreed set of biodiversity metrics, however it does not specify which ones.

Proposals: The framework should provide a list of reporting and disclosure standards already available to businesses.

Key actors: Businesses

Proposal: Businesses and standard setters.

The Nature Conservancy

<p>Proposed activity (3.1.1)</p> <p>Proposals: The Science-Based Targets Network has made significant progress in alignment for business targets.</p> <p>Comments: Add SBTN to list of actors</p> <p>Key actors: SBTN</p>

Third World Network

<p>Headline action 3</p> <p>Comments: The emphasis in this action area should be on the role of government in regulating business and their actions, especially large and transnational companies and those with the most significant impacts on biodiversity. Impacts on human rights, particularly of IPLCs, should also be addressed, including demonstrating compliance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP).</p> <p>- Policy and legal measures are needed to ensure compliance with regulation as well as to provide the tools, incentives and disincentives needed to shift business behaviour. Reliance on tools such as voluntary standards alone is not sufficient.</p> <p>Proposals: ‘Net’ impact measurement and other ‘net’ ideas leave the door open to offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity. These should be deleted from the text and focus should instead be on absolute impacts on biodiversity and human rights, particularly that of IPLCs</p> <p>Proposed activity 3.1.2</p> <p>Comments: Disclosure frameworks, such as the TNFD, must not just address the risks of biodiversity loss to businesses and financial actors, but must address the risks of business activities on biodiversity and human rights.</p>

United Nations Educational, Scientific and Cultural Organization

<p>Proposed activity (3.1.)</p> <p>Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.</p> <p>Deleted, “international generally accepted principles and codes of conduct”.</p> <p>Proposals: Businesses apply an agreed set of biodiversity metrics, ecosystem accounts, and reporting and disclosure standards, based on dependencies and net impact measurement, integrating the values of biodiversity¹¹ and their role in business models and ensuring that the values, dependencies and impacts on biodiversity throughout their supply chains are accounted for according to the application of the Precautionary Principle. international generally accepted principles and codes of conduct</p> <p>Proposed activity (3.1.1)</p> <p>Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.</p> <p>By 2025, develop and implement frameworks to integrate the value of nature in decision-making and global market mechanisms.</p> <p>Companies from all sectors use agreed measures to inform decision-making and update them in response to new insights.</p> <p>Use True Cost Accounting to track impacts on natural, produced, social and human capital.</p>
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Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Natural Capital Coalition and its partners, such as International Council on Mining and Minerals and International Petroleum Industry Environmental Conservation Association, United Nations Environment Programme/World Conservation Monitoring Centre, World Business Forum for Sustainable Development, business and their associations, the Value Balancing Alliance, the Aligning Biodiversity Measures for Business initiative (ABMB), **Global Alliance for the Future of Food** and other relevant organizations.

Proposed activity (3.1.2)

Possible milestones:

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

A Taskforce for Nature-Related Financial Disclosures, or an expanded TCFD, is set up to develop guidance for business and finance.

Climate Disclosure Standards Board (CDSB), ABMB, and CDP Forests biodiversity standards reviewed and strengthened; **True Cost Accounting (TCA) to capture synergies between capitals**

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Businesses, financial institutions and regulators **including UNEP. Citizen assemblies, or processes for consultation with indigenous peoples and local communities.**

¹¹ See decision X/3, paragraph 9(b)(ii): the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components.

Action 3.2. Businesses at all levels transition to sustainable production practices, maximizing net positive impacts on nature, biodiversity and human health, applying the mitigation hierarchy, while managing dependencies and avoiding or minimizing negative impacts, over-exploitation and pollution, including in business models and through voluntary standards, labelling and sustainability certification, and provide verifiable evidence of change, such as traceability of biodiversity impacts and transparency in supply chains and ingredients.

Business for Nature

To make provide more direction for this action, it is important to create reference to an overarching goal for nature, and to make the proposed activities more specific.

Proposed activities: 3.2.1 Businesses ensure their activities do not negatively impact nature, biodiversity, and ecosystems, also taking into account transboundary impacts from infrastructure and resource exploitation

Possible milestones: **By 2025** international organizations and initiatives and sectoral and cross-sectoral business organizations **have developed capacity building programs to support business and** develop and provide and update guidance and tools.

By 2025, **Parties have invited business to** develop business-specific ~~targets~~ **commitments and action plans to transform and become Nature positive, and integrated these plans into the NBSAPs for** minimizing impacts and dependencies on biodiversity (e.g., for reducing the footprint of the production/ value chain).

By 2030, all large businesses have adopted science-based targets for Nature

Actors: Businesses, with support from organizations; governments to provide enabling environment;

indigenous peoples and local communities, women, youth, small farmers and civil society

Comments: To provide more direction, the milestones need to include Nature positive as overall level of ambitions.

Also, integration of business commitments into NBSAPs and development of capacity building programs needs to be added in order to ensure alignment and support.

Proposals: **ADD** capacity building, integration in NBSAPs as well as a specific reference to Nature positive. And also **INCLUDE** a specific milestone on the adoption of science-based targets for nature.

Proposed activities: 3.2.6 Promote, as appropriate, further development, and methodological convergence of voluntary certification and ecolabelling schemes that are verifiable and independently reviewed and take into account the condition of small and medium enterprises in developing countries.

Actors: Businesses and their associations
Governments as regulators.
Small and medium enterprises, smallholders, small-scale farmers, pastoralists and fisherfolk

Proposals: **ADD** the notion of voluntary “sustainable” certification, as not all certification schemes cover all essential aspects of sustainability

Proposed activities: 3.2.10 Incorporate biodiversity into sustainable production policies and programmes related to all sectors, in particular those with a global presence, in accordance with national conditions and taking into account cross-sectoral, transboundary and rural-urban, life-cycle and supply chain linkages.

Actors: Ministries and agencies responsible for such policy areas as finance, economy, planning, agriculture, forestry, mining, fisheries, industry, jobs, trade, development aid, etc. Business networks and associations.

Proposals: **ADD** to actors the notion of on the ground practitioner / actors as a key source of information and insights.

Chartered Institute of Ecology and Environmental Management

Headline action 3

Comments: 3.2.9 “transitioning towards sustainable production” will not be sufficient to avert the biodiversity crisis

Proposals: “By 2030, businesses, have actively and verifiably adopted sustainable and clean production delivering net gains for biodiversity.”

Comments: 3.2.9 “particularly large and transnational companies” may allow companies with complex structures to avoid being caught by the requirements and / or to ignore impacts of small suppliers.

Proposals: Delete “particularly large and transnational companies”

EcoNexus

Headline Action 3

Action 3.2: ~~Businesses at all levels transition to sustainable production practices, maximizing net positive impacts on nature, biodiversity and human health, applying the mitigation hierarchy, while managing dependencies and avoiding or minimizing the negative impacts of over-exploitation and pollution on biodiversity, including in business models and through voluntary standards, labelling and sustainability certification, and provide regular evidence, verified at their expense, of positive and negative impacts including traceability of biodiversity impacts and transparency in supply chains and ingredients.~~

Action 3.3: Governments at all levels, rightsholders, ~~the private sector and civil society collaborate to establish and strengthen mechanisms to encourage and promote regulate business practices commitments to avoid damage to biodiversity and partnerships which enable collaboration and communication at all levels.~~

^[2] See decision X/3, paragraph 9(b)(ii): the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components.

Proposals: Indicators

Number of governments passing and enforcing legislation to make companies liable for damage to biodiversity ~~integrating the value of nature into decision making^[1] or making net positive impact commitments, or the volume or percentage of their investments~~;

Number of companies publishing their biodiversity dependencies and ~~net~~ impacts in fully verified corporate reports^[2]

Number of companies which verifiably demonstrate, in their corporate reports, ~~their net positive impacts and contributions to ecosystems, species and human health~~ the reduction of negative and the increase of their positive impacts on biodiversity.

Area of natural habitats lost/~~restored~~ by private sector activities

^[1] SDG indicators 12.6.1

^[2] SDG indicators 12.6.1

Friends of the Earth International

Headline action 3.2

Comments: Again – it must be government’s role to act, and to oblige business to comply

The objective is not “better practices” but a liveable world. Even if this implies reduction of business activity.

The mitigation hierarchy more often than not implies that destructive projects are allowed with offsetting, whereas the real answer should be to prohibit them

managing dependencies: this is a task for the business themselves, not for the CBD to manage it for businesses

voluntary standards, labelling and sustainability certification: have in the past shown very negative results, with lots of labels which promise sustainability, but which in practice do not comply. This cannot be the basis for a policy. Also, such bad practices undermine the trust of the public and therefor undermine their further willingness to act positively for the environment.

Governments must ensure that information provided by voluntary standards, labelling and certification is true, and severely sanction those who provide false information.

Proposals: Action 3.2: *Governments ensure that Businesses at all levels reduce their impact to levels within local and planetary ecological capacity and transition to sustainable production practices, maximizing net positive minimizing impacts on nature, biodiversity and human health, ~~applying the mitigation hierarchy,~~ while managing dependencies and avoiding or minimizing negative impacts, over-exploitation and pollution, including in business models and through voluntary standards, labelling and sustainability certification, and provide verifiable evidence of change, such as traceability of biodiversity impacts and transparency in supply chains and ingredients.*

Comments: Again – it must be government’s role to act, and to oblige business to comply

Proposals: 3.2.1 Governments ensure businesses under their jurisdiction or in their territory ensure their activities do not negatively impact nature, biodiversity, and ecosystems, also taking into account transboundary impacts from infrastructure and resource exploitation.

GOVERNMENTS TO REGULATE

Businesses, with support from organizations; governments to provide enabling environment; indigenous peoples and local communities, women, youth, small farmers and civil society.

Comments: It's not clear what is meant by innovation policies. But it runs the risk of finding policy proposals that generate technofixes, which ultimately worsen the environment. Regarding traditional knowledge systems: these can be important to understand how humans can interact positively with nature, but should not be abused as sources to for-profit knowledge

Proposals: 3.2.2 Implement research and ~~innovation~~ policies, into products and production processes with lower impacts on biodiversity, and promote better understanding of biodiversity interactions and traditional knowledge to explore opportunities of working with ecosystems for nature and people.

By 2025, undertake technology assessments, examining proposed technologies at every stage of development, including appropriate ~~safeguards~~ **regulations** to stop ~~net~~ loss of biodiversity in projects, including infrastructure, public procurement, environmental licensing, etc.

Governments

3.2.3 **Governments regulate for business to** Revise and implement corporate procurement policies which ~~oblige encourage or incentivize~~ suppliers, and set goals

in order to achieve **reducing the impact of business on nature by 50%** along supply chains based on measured impacts and dependencies on nature, biodiversity, ecosystems and their services.

Governments to regulate ...Corporations to establish green procurement policies to ensure that procurement/purchases take into account environmental impacts.

Trade and sector associations to support above initiatives with standards and capacity-building.

Governments

Businesses, with support from their associations and organizations; governments to provide enabling environment.

Comments: NBS: most of these projects are oriented to offsetting and greenwashing

3.2.4 **Governments regulate ...**

~~Develop business models and associated technology which include and promote to protect ecosystems and nature-based solutions,~~ as well **implement** as favourable biodiversity and ecosystem resilience practices along supply chains.

~~Significant increase in applied nature-based solutions by the private sector~~

Governments

Businesses, and their partners, with governments to provide support and an enabling environment

Comments: Offsetting only moves the destruction from one place to the other, and doesn't solve the biodiversity crisis. This is in the "best" offsetting cases. Whereas very often, there isn't any real additionality and actually offsetting implies more loss. The mitigation hierarchy more often than not implies that destructive projects are allowed with offsetting, whereas the real answer should be to prohibit them

~~3.2.5 Pursue biodiversity offsets and compensation mechanisms, where relevant and appropriate and in accordance with national legislation, ensuring they respect the mitigation hierarchy, in the planning system with the involvement of indigenous and local communities as applicable.~~

~~Governments and businesses, with the participation of indigenous peoples and local communities and civil society.~~

~~3.2.6 Promote, as appropriate, further development, and methodological convergence of voluntary certification and ecolabelling schemes that are verifiable and independently reviewed and take into account the condition of small and medium enterprises in developing countries.~~

Voluntary certification has proven not to improve the situation for the environment nor for the rights of IPLCs.

Voluntary certification is being used to undermine the need for real policies.

Some very good background literature can be found here:

- <https://en.milieudefensie.nl/news/palm-oil-certification-not-out-of-the-woods.pdf>
<https://www.greenpeace.org/international/publication/46812/destruction-certified/>

This proposed activity only relates to voluntary action and applauding (sometimes minimal) positive steps. It undermines real policy measures and should not be part of a policy framework such as the LTAM should be

For the negative implications of voluntary certification, see comments at 3.2.6

~~3.2.8 Recognize private and public companies that dedicate resources to the conservation and sustainable use of biodiversity or to reducing impacts on biodiversity¹¹ and support voluntary initiatives for nature, including leadership on excellence and best practices, and encourage standards, criteria, certification and ecolabelling options to nature friendly goods and services.~~

Comments: Business as such do not have positive impact. They greenwash by showing positive impact, which is mostly just buying offsets. So this should not be shown as being positive, and business should be transparent about their negative impacts ¹¹ Ibid.

Proposals: 3.2.9 **Governments regulate so that** by 2030, business, in particular large and transnational companies, have actively and verifiably transitioned towards sustainable and cleaner production, reducing their negative impact on biodiversity and ecosystems, ~~and maximizing positive impacts on natural capital.~~

Comments: It needs to be governmental regulation, and it needs to ensure that the human economy fits within the planetary boundaries

Proposals: 3.2.10 **Governments require businesses to** incorporate biodiversity into sustainable production policies and programmes related to all sectors, in particular those with a global presence, **with the aim to ensure business activity overall fits within local and planetary ecological capacity** in accordance with national conditions and taking into account cross-sectoral, transboundary and rural-urban, life-cycle and supply chain linkages

International Indigenous Forum on Biodiversity (IIFB)

Proposed activity 3.2.1. bis

Comments: Moreover this headline action should also include addressing the human rights impacts of businesses in addition to biodiversity, including the impacts from telecoupling dynamics of supply chains

Proposals: Businesses ensure their activities do not negatively impact HUMAN RIGHTS, also taking into account transboundary impacts from infrastructure and resource exploitation

Proposed activity 3.2.1 ter

Comments: It is well documented that Indigenous peoples and their territories have been historically impacted negatively by transnational companies (mostly in mining, energy and plantation related companies)

Proposals: Transnational companies ensure their activities do not lead to killings and evictions of indigenous peoples and local communities and environmental human rights defenders, and all activities undergo FPIC

Proposed activity 3.2.10 bis

Comments: There should be active recognition, support and promotion of local businesses and micro, small and medium enterprises that depend on the conservation and sustainable use of biodiversity, such as those led by indigenous peoples and local communities

Proposals: Governments recognize, support, promote and incentivize local businesses and small enterprises that promote the conservation and sustainable use of biodiversity, including through the promotion of traditional knowledge, such as those led by indigenous peoples and local communities

IPIECA

Proposed activity 3.2.1

Comments: Potentially misleading as currently worded. It is not feasible to expect that there will no more nature-negative activities by businesses in the future. However, nature-negative activities will need to get balanced/compensated by greater net positive and nature positive activities to aim to achieve an overall nature positive outcome.

Proposals: Specify that overall business activities (i.e., negative plus positive activities) need to aim to align or be consistent with **nature positive**.

Possible milestones: The milestones should set guidance for ambitions of alignment or consistency with **nature positive** contributions instead of “no negative impact”.

Some frameworks, such as TNFD, include disclosure requirements for targets already.

Proposals: Align milestone timeframe with TNFD and other international initiatives and include the ambition for business activities to aim to align or be consistent with aims to align or consistency with **nature positive**.

Key actors: Sectoral and cross-sectoral business organisations should develop and provide and update their guidance and tools, including for applying the mitigation hierarchy.

Proposed activity 3.2.2

Comments: Wording could be misleading or confusing. Typically, we conduct research to assess/develop technologies and then adopt or implement technologies. We don't implement research. Also, policies provide a reference point or commitment for the process. We implement policies by conducting research, develop and implement technologies.

Enhancement of biodiversity and ecosystem services should be identified as outcomes.

Proposals: Modify wording to provide clarity.

There seem to be two key actions that should be separated: 1) Developing/assessing innovative technologies with a lower biodiversity impact through research and considering traditional knowledge; and 2) Adopting the new technologies for operations and products.

It would be helpful to include a business driver for research and technology. For example, reduce business risks and impacts to biodiversity/nature through research, technology, etc.

Possible milestones: Undertaking technology assessments is only the first step. Developing and adopting innovation and technology are the second and third steps. Assessing/developing/adopting does not occur simultaneously and needs separate milestones.

Biodiversity enhancement needs to be included rather than no net loss.

Proposals: Provide separate milestones for assessment, development and adoption of technology and innovation.

Key actors: This is missing the businesses as actors. There is also room to add governments as actors to fund research.

Proposals: Distinguish between business actors commissioning research, business and governments funding the research and institutions or agencies conducting the research.

Proposed activity 3.2.3

Comments: 3.2.3 refers to "a determined baseline". Indications on the baseline to consider shall be established in order to have a common and comparable approach.

It is not so much about supply chain policies, but about practices. There needs to be a business rationale to incentivize suppliers. No net loss and net gain applies to biodiversity impacts. It is unclear how this would be translated for dependencies. There is some redundancy, dependencies is another word for ecosystem services

Proposals: Simplify and provide more clarity on the activities. Provide a common and comparable baseline.

Possible milestones: Is green procurement the same as NNL/NG supply chain and the same as nature-positive supply chain? Are environmental impacts the same as "impacts and dependencies on nature, biodiversity, ecosystems and their services" Terminology needs to be consistent.

Proposals: Simplify and provide more clarity on the activities.

Proposed activity 3.2.4

Comments: Nature-based solutions are only a business model for companies selling or facilitating nature-based solutions. For other companies NbS is one of the options or opportunities supporting a nature-positive approach. I am not sure what technologies could promote ecosystems or NbS. This is worded as if it applies only to supply chain, not to business activities or operations.

Possible milestones: "Significant increase in applied NbS..." – Need to clarify how businesses can demonstrate significant increase? Is there a way to measure NbS applications? What is the definition of significant?

Proposed activity 3.2.5

Comments: Need to specify what "compensation mechanisms" this is referring to.

Proposals: Suggested wording:

Implement biodiversity offsets, where appropriate, in accordance with national legislation, and in consultation with indigenous and local communities as applicable.

Proposed activity 3.2.6

Comments: Specify whether "voluntary certification and ecolabelling schemes" is applicable for products only or also for services.

The action is missing a reference to what would be voluntarily certified. This could apply to biodiversity offsets, but also to NbS

Proposals: Suggested wording:

To enable implementation of Biodiversity Offsets and Nature-based Solutions, promote, as appropriate, further development, and methodological convergence of independent voluntary certification standards with implementation mechanisms appropriate for small and medium enterprises in developing countries.

Proposed activity 3.2.7

Comments: Biodiversity dependencies and impacts are covered as reporting requirements by frameworks and standards such as TNFD, GRI, etc. This is already covered in 3.1.2

Proposals: Merge with 3.1.2 or potentially focus on companies to share their biodiversity data.

Possible milestones: Not clear the difference with 3.1.2.

Proposals: Merge with 3.1.2

Proposed activity 3.2.8

Comments: There is no need for recognising compliance. 3.1.1 and 3.2.7 are already focused on establishing mandatory processes and actions in support of nature positive outcomes.

Proposals: Delete proposed activity 3.2.8

Proposed activity 3.2.9

Comments: This basically describes meeting disclosure requirements by frameworks and standards such as TNFD, GRI, etc. The frameworks apply to all sectors and all companies, and it is not consistent with these frameworks to focus on "large and transnational companies" only. TNFD expects that companies are in full disclosure compliance after 5 years (by 2028), which includes having targets to achieve nature positive.

The deadline for achieving nature positive should align with the Global Goal for Nature, which is to have the objective to become net positive by 2030 as a milestone to achieve nature positive.

Proposals: Suggested wordings:

By **2030**, businesses are in full compliance with frameworks and standards including targets to become nature positive.

Possible milestones: Keep the possibility of being sited in some protected areas (many human activities occur in some types of Protected Areas, like farming, urban development, transport infrastructure).

2025 might be a too close deadline, considering that relevant frameworks are still ongoing.

Proposals: Suggested wordings:

By **2030**, implement and disclose management approaches to siting and area use **in and adjacent** to protected areas and areas of high biodiversity, manage the impacts of activities, products and services on biodiversity, protect and restore species and habitats in areas affected by operations (GRI).

By **2030**, companies demonstrate, in their sustainability reports, significantly decreasing negative impacts on ecosystems, biodiversity, and their production of waste or use of hazardous chemicals in the supply chain.

Proposed activity 3.2.10

Comments: It is not clear if "policies and programs" refers to regulatory policies (regulations) or business policies. This could be simplified, and combined with 3.2.9, by stating that businesses and governments adopt recommendations developed by frameworks and standard such as TNFD, GRI, etc.

Proposals: Merge with 3.2.9.

Suggested wordings:

Businesses and governments adopt recommendations developed by frameworks and standard such as TNFD, GRI, etc.

Key Biodiversity Area Partnership c/o BirdLife International**Proposed activity 3.2.1**

Proposed activity (3.2.1) *Businesses ensure their activities do not negatively impact nature, biodiversity, and ecosystems, also taking into account transboundary impacts from infrastructure and resource exploitation.*

Comments: This is an important activity and needs to also relate to the spatial planning established under target 1. It is important to specify these plans as they are spatially explicit and show where impacts are likely to be greatest. General language about nature and biodiversity doesn't help guide implementation and we want the plans developed under target 1 to be used and mainstreamed if there is to be a positive impact for biodiversity. Tools exist to help business and the Integrated Biodiversity Assessment Tool (IBAT) (<https://www.ibat-alliance.org/>) has been specifically designed to help business minimise their negative impacts on important sites for biodiversity and species that are threatened.

Proposals: *Businesses use spatial plans for biodiversity and IBAT to ensure their activities do not negatively impact nature, biodiversity, and ecosystems, also taking into account transboundary impacts from infrastructure and resource exploitation.*

Proportion of businesses operating in the country that subscribe to tools such as IBAT and use national spatial plans for biodiversity to guide where and how they operate.

Key actors: Integrated Biodiversity Assessment Tool (IBAT)

Planet Tracker

Action 3.2

Comments: In Action 3.2, the framework suggests that business should transition through voluntary standards. However, as experience has shown, voluntary commitments are insufficient to fuel a meaningful transition.

Proposals: We suggest exchanging “voluntary” with more impactful instruments which are mandatory.

Key actors: Businesses

Proposals: Businesses, standard setters, policy makers.

The Nature Conservancy

Proposed activity 3.2.5

Proposals: Offsets should be applied as last resort, so text should be clear that we are not necessarily promoting use of offsets by business.

Possible milestones: Existence of functioning public database of offset projects

Third World Network

Proposed activity 3.2.3, 3.2.4, 3.2.5

Proposals: Delete references to concepts such as ‘no-net loss’, ‘net gain’, ‘nature-based solutions’ and ‘biodiversity offsets’ as these allow for carbon and biodiversity offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity.

United Nations Educational, Scientific and Cultural Organization

Headline action 3.2

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the word “over-”.

Proposals: Businesses at all levels transition to sustainable production practices, maximizing net positive impacts on nature, biodiversity and human health **and sustainable livelihoods**, applying the mitigation hierarchy, while managing dependencies and avoiding or minimizing negative impacts, ~~over~~-exploitation and pollution, including in business models and through voluntary standards, labelling and sustainability certification, and provide verifiable evidence of change, such as traceability of biodiversity impacts and transparency in supply chains and ingredients **developed using participatory approaches**.

Proposed activity (3.2.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Businesses can use voluntary codes of conduct to ensure their activities do not negatively impact nature, biodiversity, and ecosystems, also taking into account transboundary impacts from infrastructure and resource exploitation outlined in the UN Guiding Principles on Business and Human Rights.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Businesses, with support from organizations; governments to provide enabling environment; indigenous peoples and local communities, women, youth, small farmers and civil society.

Proposed activity (3.2.2)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the words “with lower”.

Proposals: Implement research and innovation policies into products and production processes with lower reduce impacts on biodiversity to zero and promote better understanding of biodiversity interactions and traditional knowledge to explore opportunities of working with ecosystems for nature and people.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Private and public research, development and innovation agencies.

Investment promotion and industrial innovation agencies and facilities.

The information and technology sectors.

Indigenous peoples and local communities, women, youth, small farmers and civil society.

Proposed activity (3.2.3)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: Revise and implement corporate procurement policies which encourage or incentivize suppliers and set goals in order to achieve along increasingly localized supply chains based on measured impacts and dependencies on nature, biodiversity, ecosystems and their services .

Key actors:

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight. , Businesses, with support from their associations and organizations; governments to provide enabling environment.; local communities.

Proposed activity (3.2.4)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the words “nature”, “solutions” and “technology”.

Proposals: Develop inclusive business models and associated technology innovations which include and promote ecosystems and ecosystems-nature-based solutions approaches, favourable biodiversity and ecosystem resilience practices along supply chains inclusive of local, traditional and indigenous knowledge. Include bioregional initiatives/designations that add value to local/biodiverse products that enhance nature as well as local economic development.

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted words “nature” and “solutions”.

Significant increase in applied ~~ecosystems-nature based solutions~~ **approach** by the private sector.

Key actors: Businesses, and their partners, with governments to provide support and an enabling environment **inclusive of local, traditional and indigenous knowledge.**

Proposed activity (3.2.5)

Remove section due to mechanisms being highly contentious and problematic.

Proposed activity (3.2.6)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight. Promote, as appropriate, further development, and methodological convergence of voluntary certification and ecolabelling schemes that are **developed through participatory engagement with local communities,** **are** verifiable and independently reviewed and take into account the condition of small and medium enterprises in developing countries.

Possible milestones:

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Track business and operational strategies grounded in solidarity economy principles, including shared governance and participation of all stakeholders, cost-saving approaches, working with nature, investing in training and dignified work, and values-aligned blended finance.

Proposed activity (3.2.7)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight. , Provide information, **indigenous knowledge** and scientific insight on biodiversity dependencies and impacts, including that based on traditional knowledge, to enable and inform consumption and production decisions **based on community engaged participatory approaches.**

Proposed activity (3.2.8)

Deleted the word “best”.

Recognize private and public companies that dedicate resources to the conservation and sustainable use of biodiversity or to reducing impacts on biodiversity and support voluntary initiatives for nature, including leadership on excellence and ~~best~~ **good** practices, and encourage standards, criteria, certification and ecolabelling options to nature-friendly goods and services.

Key actors:

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Relevant government entities, third party **social enterprise** recognized certification schemes **developed through participatory community engagement,** rating agencies, business, financial sector.

Proposed activity (3.2.9)

Key actors: Deleted the word “additionally”.

Businesses and their associations and networks.

Indigenous peoples and local communities, non-governmental organizations, academia and social organizations, youth to provide ~~additional~~ guidance.

Proposed activity (3.2.10)

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Ministries and agencies responsible for such policy areas as finance, economy, planning, agriculture, forestry, mining, fisheries, industry, jobs, **sustainable livelihoods**, trade, development aid, etc.
Business networks and associations.

University of Cambridge Conservation Leadership Alumni Network

Headline action 3.2.

Comments: Businesses at all levels transition to sustainable production practices, maximizing net positive impacts on nature, biodiversity and human health, applying the mitigation hierarchy, while managing dependencies and avoiding or minimizing negative impacts, over-exploitation and pollution, including in business models and through voluntary standards, labelling and sustainability certification, and provide verifiable evidence of change, such as traceability of biodiversity impacts and transparency in supply chains and ingredients

Proposals: Businesses at all levels transition to sustainable production practices, halt biodiversity loss and increase positive impacts on nature

Action 3.3: Governments at all levels, rightsholders, the private sector and civil society collaborate to establish and strengthen mechanisms to encourage and promote business commitments to biodiversity and partnerships which enable collaboration and communication at all levels.

Business for Nature

This is a crucial action as it is crucial to curate the collaboration across the whole-of-society in order to mainstream biodiversity more successfully.

Proposed activities: 3.3.1 Promote and support business and biodiversity platforms, networks, initiatives and/or partnerships, at the regional, national and/or subnational and local levels for business and biodiversity, to facilitate exchange of information and good practices between the private sector and other stakeholders.

Possible milestones: By 2025, the CBD Secretariat has expanded and strengthened international collaboration between business, finance and policy ~~existing Global Partnership for Business and Biodiversity chapters by 2025.~~

~~GPBB includes national and sectoral chapters, including through the finance sectoral collaboration-~~
By 2025, Parties have set up mechanisms, such as Business and Biodiversity Platforms, to support public-private collaboration to implement the Post-2020 Global Biodiversity Framework.

Actors: **CBD Secretariat and Parties**, ~~governments~~ in collaboration with businesses and their associations, and civil society organizations.

Comments: As the international collaboration between business and policy has progressed considerably, the milestone should not be limited to the GPBB and there should be a clear leading role for the CBD Secretariat to curate the international collaboration. Also, there needs to be a clear milestone for Parties to set up collaboration mechanisms between policy, finance and business.

Proposals: ADD: Role for Secretariat and Parties.

BROADEN the scope beyond the GPBB.

ADD a new milestone on setting up national collaboration.

Proposed activities: 3.3.2 Establish, populate and support global, sectoral and thematic platforms to enable economic sectors to communicate their biodiversity commitments and solutions, so that their implementation is actively monitored and reported.

Possible milestones: By 2024, a **business and finance chapters are developed in the NBSAPs with national targets and roadmaps to ensure** voluntary climate and biodiversity commitment **actions** and **to track** progress for Governments and the business and finance sectors ~~is created and populated~~.

Actors: Platforms and coalitions that are registered with CBD initiatives, such as the GPBB, Action Agenda, and regional/national platforms. **Business for Nature**, World Economic Forum, World Business Forum for Sustainable Development, International Chamber of Commerce, local and sectoral and trade associations in all sectors (including International Council on Mining and Minerals, International Petroleum Industry Environmental Conservation Association, Global Concrete and Cement Association, Cross-Sector Biodiversity Initiative, Union for Ethical BioTrade, Friends of Ocean Action, Food and Land Use Coalition).

Proposals: **ADD** specifically business and finance chapters as part of future NBSAPS.

Also, **ADD** Business for Nature as one of the actors.

Friends of the Earth International

Action 3.3

Comments: This action is wrongly focussed on business commitments, which cannot be controlled by the CBD. It needs to be Governments which need to oblige business to act. Else everything is voluntary, and the final results will be much less than what is needed for the planet.

Business partnerships have the characteristic that they produce power imbalances with rightsholders and with local governments, which tend to have less economic power than global business corporations.

Proposals: *Action 3.3: Governments at all levels, rightsholders, ~~the private sector and civil society~~ collaborate to establish and strengthen **policy frameworks mechanisms to encourage and promote business commitments to improve biodiversity and partnerships which enable collaboration and communication at all levels.***

Comments: Business commitments cannot be controlled by the CBD. It needs to be Governments which need to oblige business to act. Else everything is voluntary, and the final results will be much less than what is needed for the planet.

Business partnerships have the characteristic that they produce power imbalances with rightsholders and with local governments, which tend to have less economic power than global business corporations.

Governments need to act as independent actors.

Proposals: 3.3.1 Promote and support ~~business and~~ biodiversity **governance** platforms, ~~networks, initiatives and/or partnerships,~~ **networks, initiatives and/or partnerships**, at the regional, national and/or subnational and local levels for business and biodiversity, to facilitate exchange of information and good practices between ~~the private sector and other stakeholders~~ **all rightsholders**.

~~Expanded and strengthened existing Global Partnership for Business and Biodiversity chapters by 2025. GPBB includes national and sectoral chapters, including the finance sector~~

~~Governments in collaboration with businesses and their associations, and civil society organizations.~~

Proposals: 3.3.2 ~~Establish, populate and support global, sectoral and thematic platforms to enable economic sectors to communicate their biodiversity commitments and solutions,~~ **Government define sector-wide biodiversity policies, at global, sectoral and thematic level, and ensure** so that their implementation is, ~~including through~~ **including through** actively monitored and reported

~~By 2024, a voluntary climate and biodiversity commitment and progress tracker for Governments and the business and finance sectors is created and populated.~~

Governments

Platforms and coalitions that are registered with CBD initiatives, such as the GPBB, Action Agenda, and regional/national platforms.

~~World Economic Forum, World Business Forum for Sustainable Development, sectoral and trade associations in all sectors (International Council on Mining and Minerals, International Petroleum Industry Environmental Conservation Association, Global Concrete and Cement Association, Cross-Sector Biodiversity Initiative, Union for Ethical BioTrade, Friends of Ocean Action, Food and Land Use Coalition).~~

Third World Network

Proposed activity 3.3.1

Key actors: It is not a government’s role to “promote and support” business and biodiversity platforms, networks, initiatives and/or partnerships.

Proposed activity 3.3.2

Comments: Voluntary commitments must not substitute for governments’ legally binding obligations under the CBD. Importantly, they must not be used by corporate actors to ‘greenwash’ their activities.

United Nations Educational, Scientific and Cultural Organization

Proposed activity (3.3.1)

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Expanded and strengthened existing Global Partnership for Business and Biodiversity chapters by 2025. GPBB includes national and sectoral chapters, including the finance sector.

Ensure these are aligned with indigenous and traditional knowledge

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Governments in collaboration with businesses and their associations, and civil society organizations.

Indigenous peoples and local communities, non-governmental organizations, academia and social organizations, youth to provide guidance.

Proposed activity (3.3.2)

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Platforms and coalitions that are registered with CBD initiatives, such as the GPBB, Action Agenda, and regional/national platforms.

World Economic Forum, World Business Forum for Sustainable Development, sectoral and trade associations in all sectors (International Council on Mining and Minerals, International Petroleum Industry Environmental Conservation Association, Global Concrete and Cement Association, Cross-Sector Biodiversity Initiative, Union for Ethical BioTrade, Friends of Ocean Action, Food and Land Use Coalition), **Global Alliance for the Future of Food.**

HEADLINE ACTION 4: Financial institutions at all levels apply biodiversity risk assessment policies and processes, having developed tools for biodiversity financing to demonstrate decreasing negative impacts on ecosystems and biodiversity in their portfolios and increasing amounts of dedicated finance.

Action 4.1: Financial institutions at all levels apply and engage with their clients on an agreed and verifiable set of biodiversity metrics, reporting and disclosure standards, based on dependencies and net impact measurement and integrating the values of biodiversity in investment portfolios and lending decisions

Business for Nature

This is important to mainstream biodiversity into finance, and crucial for enabling finance of nature positive business action, but can be made more concrete by aligning it with the TNFD developments.

Proposed activities: 4.1.1 Develop and use existing biodiversity metrics in the investment and lending decisions of all types of financial institutions, including multilateral and international development banks.

Possible milestones: By 2030, Financial institutions of all types, **including Multilateral Development Banks, use the TNFD- framework for nature-related financial disclosure** agreed measures to inform decision-making at the portfolio level and the project level and constantly update them in response to new insights.

~~Multilateral development banks use agreed measures to inform decision-making at the level of their contractual arrangements with public and private partner financial institutions and constantly update them in response to new insights~~

Actors: TNFD and its partners, the International Chamber of Commerce, Capitals Coalition and its partners, United Nations Environment Programme/World Conservation Monitoring Centre, Parties, UNEP Finance Initiative, the financial sector.

Comments: Need to align this with TNFD developments. And an opportunity to simplify this by merging the two milestones.

Proposals: **ADD** TNFD as a key actor. **ADD** reference to the TNFD framework. **ADD** International Chamber of Commerce **MERGE** the two milestones.

EcoNexus

Headline action 4

Proposals: **Action Area 4:** Governments regulate **Financial institutions at all levels apply biodiversity risk assessment policies and processes, having developed tools for biodiversity financing** to demonstrate decreasing negative impacts on ecosystems and biodiversity in their portfolios and increasing amounts of ~~dedicated~~ finance dedicated to verifiable evaluation of these impacts.

Other comments or proposals: *Action 4.1: Governments pass legislation at regional, national and international level to oblige Financial institutions ~~at all levels apply and engage with their clients on an agreed and verifiable set of biodiversity metrics, reporting and disclosure standards, to report and disclose based on dependencies and net impact measurement and integrating the values of biodiversity~~ in the impacts on biodiversity of their investment portfolios and lending decisions and to reduce harmful investment and lending verifiably by x% a year.*

Friends of the Earth International

<p>Headline action 4</p> <p>Comments: Again, it needs to be based upon governmental regulation The objective of this action area is to reduce the impact of finance for biodiversity-negative investments. The risk assessment of diminished biodiversity conservation status for the finance sector itself is not the responsibility of the CBD. “ increasing amounts of dedicated finance”: there are very little investments which are truly positive for nature. Many of those which are portrayed to be so are really greenwashing. It is therefore better not to include those in the text.</p> <p>Proposals: Action area 4: Governments regulate for Financial institutions at all levels to apply biodiversity risk assessment policies and processes, having developed tools for biodiversity financing to demonstrate decreasing negative impacts on ecosystems and biodiversity in their portfolios and increasing amounts of dedicated finance.</p> <p>Action 4.1</p> <p>Comments: Again, it needs to be based upon governmental regulation Clients may have very different interests than real biodiversity protection, and should therefore not be the basis for defining sustainable investment policies. It is very likely that there is conflict of interest. Biodiversity metrics mostly measure biodiversity in limiting and restrictive ways, while all different types of considerations should be taken on board. Dependencies of business and the finance sector on biodiversity is their own worry, not the responsibility of the CBD Net: there needs to be transparency about the real impact. If there are eventual positive impacts- which are not greenwashing- then these could be reported separately.</p> <p>Proposals: Action 4.1: Governments regulate for financial institutions at all levels to apply and engage with their clients on an agreed and verifiable set of biodiversity metrics considerations, reporting and disclosure standards, based on dependencies and net impact measurement and integrating the values of biodiversity in investment portfolios and lending decisions.</p>
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IPIECA

<p>Proposed activity 4.1.1</p> <p>Comments: "Develop and use existing biodiversity metrics " - Not clear whether this is referring to an additional set of metrics specific for financial institutions only that are different from the metrics of Headline action 3? In order to avoid having too many metrics, financial institutions should refer to the same metrics in Headline area 3 (which companies shall disclose anyway) in their investment and lending decisions.</p> <p>Proposals: Align metrics for financial institutions and businesses.</p>
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Planet Tracker

<p>Headline action 4</p> <p>Other comments or proposals:</p> <p>Comments: In Strategy Area II, business and finance should be addressed separately in order to follow their own specific dynamics.</p> <p>Proposals: Keep them separated.</p>

The Nature Conservancy

Headline action 4

Proposals: As **transparency** is critical first step for finance, it would be useful to call this out in the headline action

Comments: Revise text to read, “Financial institutions at all levels apply **and report on** biodiversity...”

Other comments or proposals: We think it is useful to separate business and finance. Finance can have increased leverage.

4.1.2 (NEW)

Proposals: Data on portfolio biodiversity impacts should be collected made public in aggregate

Comments: Financial institutions are transparent about biodiversity impacts resulting from projects in their portfolio. In particular, development banks and international financial institutions should publicly report on projects impacting critical habitat, projects converting any natural habitat (extent in ha), and offsets required/implemented from projects.

Third World Network

Headline action 4

Comments: - The emphasis in this action area should be on the role of government in regulating financial actors and providing the policy and regulatory environment to compel financial institutions to ensure that their activities and financing do not cause biodiversity loss nor impacts on human rights, particularly of IPLCs. Compliance with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP) should be demonstrated.

- Policy and legal measures are needed to ensure compliance, as well as to provide the tools, incentives and disincentives needed to shift behaviour.

Voluntary efforts like the Taskforce on Nature-related Financial Disclosures (TNFD) will be ineffective if they are not coupled with regulatory action and robust conflicts of interest procedures.

- Risk analysis of risks of biodiversity loss to business is one aspect, but the more important aspect is that risk analysis must include the risks of business practices on biodiversity and human rights, and the response by investors needed to ensure that such risks are avoided.

Proposals: ‘Net’ impact measurement and other ‘net’ ideas leave the door open to offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity. These should be deleted from the text and focus should instead be on absolute impacts on biodiversity and human rights, particularly that of IPLCs.

- The use of public funds to de-risk private capital investment (blended finance) is problematic. Large amounts of public capital will be needed to leverage the desired private capital. There is no guarantee that more private capital will lead to biodiversity outcomes. Instead, there is a risk of private gains and social losses, as blended finance guarantees the incomes of investors and investment bankers, rather than peoples and nature. We suggest deletion of the term ‘blended finance’. Rather the focus should be on other ways to mobilise public funds and policies that disincentivise environmental degradation in the first place

United Nations Educational, Scientific and Cultural Organization

<p>Headline Action 4</p> <p>Proposed activity (4.1.1)</p> <p>Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.</p> <p>Financial institutions of all types use agreed measures to inform decision-making at the portfolio level and the project level and constantly update them in response to new insights. Multilateral development banks use agreed measures to inform decision-making at the level of their contractual arrangements with public and private partner financial institutions and constantly update them in response to new insights.</p> <p>Track business and operational strategies grounded in solidarity economy principles, including shared governance and participation of all stakeholders, cost-saving approaches, working with nature, investing in training and dignified work, and values-aligned blended finance</p> <p>Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight. Capitals Coalition and its partners, United Nations Environment Programme (True Cost Accounting)/World Conservation Monitoring Centre, Parties, UNEP Finance Initiative, Transformational Investing in Food Systems Initiative, Global Alliance for the Future of Food, the financial sector</p>

Action 4.2: Financial institutions at all levels incorporate biodiversity loss in their risk analyses and have increasing net positive impacts on biodiversity, including by financing activities that can verifiably demonstrate biodiversity benefits or co-benefits.

Business for Nature

<p>Comments: This action also is important to mainstream biodiversity into finance. Again, there is a need to align it with TNFD developments. And there is a need to add several actors</p> <p>Proposed activities: 4.2.2 Increase cooperation between Governments and regulators (regulation, reporting frameworks...) and the financial sector in reporting and disclosure.</p> <p>Possible milestones: By 2025, Governments, central banks and regulators have adopted and integrated the TNFD framework in their define the regulation and reporting framework requirements for the financial sector.</p> <p>By 2025, financial institutions report on their risks and remedial actions.</p> <p>Actors: International, national and local financial institutions, including development banks.</p> <p>Comments: Need to align this with the TNFD.</p> <p>Proposals: AMEND the Milestone to align with TNFD progress.</p> <p>Proposed activities: 4.2.3 Integrate socioeconomic risks of degradation to ecosystems and their services and biodiversity decline in macroprudential and actuarial policies, in connection with climate analysis.</p> <p>Possible milestones: By 2025, Parties have integrated Biodiversity risks and natural capital dependencies are incorporated in macroeconomic analysis.</p> <p>Actors: Government entities in collaboration with finance ministries and/or financial regulators, as well as relevant international institutions (like UNSD, OECD, World Bank Group).</p> <p>Comments: Need to make the milestone more specific, and add natural capital dependencies to make the assessment more complete.</p> <p>Need to bring in relevant international institutions as well</p>

Proposals: ADD Parties and natural capital dependencies in the milestone. ADD UNSD, OECD and World Bank Group as relevant actors.

EcoNexus

Headline action 4

Proposals: *Action 4.2: Financial institutions at all levels incorporate biodiversity loss in their risk analyses and ~~have increasing net positive impacts on biodiversity, including by financing finance activities that can verifiably demonstrate biodiversity benefits or co-benefits.~~*

Friends of the Earth

Action 4.2

Comments: This needs to be based upon governmental regulation

The risk analysis of diminished biodiversity conservation status for the finance sector itself is not the responsibility of the CBD.

Finance for “positive” activities is more often than not greenwashing, and this should be avoided. It is therefore better not to include this issue

Proposals: *Action 4.2: Governments regulate for Financial institutions at all levels to incorporate biodiversity loss in their risk analyses and ~~have increasing net positive~~ their negative impacts on biodiversity, including by prohibiting investments in particularly damaging sectors, and finance activities that can verifiably demonstrate biodiversity benefits or co-benefits.*

Comments: The risk assessment of diminished biodiversity conservation status for the finance sector itself is not the responsibility of the CBD.

Also if a biodiversity-negative investment doesn't pose any immediate risk for the investment, this should still be an important consideration to stop such an investment.

The decisions have to be made on the basis if investments are negative for biodiversity, not if they pose a risk for the investment.

Proposals: 4.2.1 **Governments regulate to** Insert biodiversity risks in financial business accounting and analysis, in connection with environmental, social and governance (ESG) considerations risks.

By 2025, financial institutions have integrated biodiversity considerations risks in their general decision making criteria for investments risk cartography and analysis.

Governments

International, national and local financial institutions, including development banks.

Central banks may implement associated macroprudential risk analysis

Governments, central banks and regulators

International, national and local financial institutions, including development banks.

4.2.3 Integrate socioeconomic considerations risks of degradation to ecosystems and their services and biodiversity decline in macroprudential and actuarial policies, in connection with climate analysis.

Biodiversity considerations risks are incorporated in macroeconomic analysis.

Comments: Risks: also biodiversity-negative investment with no clear risks need to be excluded

Net: the impact of negative decisions needs to be transparent

Nature Based Solutions: most of them are oriented to offsetting and greenwashing

Proposals: By 2024, governments financial institutions develop exclusion lists or other taxonomy systems in financing projects of financial institutions, to lower prohibit negative and increase positive impacts for biodiversity; by 2028, they reduce portfolio risks, finance nature based solutions, and achieve net biodiversity gains in financed projects.

Comments: The risk assessment of diminished biodiversity conservation status for the finance sector itself is not the responsibility of the CBD.

The decisions which protect biodiversity need to be taken for the good of biodiversity, not because it diminishes the financial risk.

Governments

4.2.5 Identify and integrate ~~risks associated with~~ **considerations regarding** ecosystem degradation and biodiversity decline in portfolios ~~risk analyses~~ and associated lending decisions of public and private financial institutions, with the appropriate safeguards that ensure no-net loss and, if possible, net gain in biodiversity.

By 2025, **Governments define a system for** ~~the risks associated with~~ **identifying** ecosystem degradation and biodiversity decline ~~are identified~~ and ~~reflecting~~ **these considerations** in portfolio ~~risk analyses~~ and associated lending decisions of public and private financial institutions, taking also into account, as appropriate, **transboundary** impacts from infrastructure and resource exploitation.

Governments

Public and private finance agencies and bodies, banks, funds, insurance and other financial institutions ~~in collaboration with Governments~~

Public and private finance agencies and bodies, banks, funds, insurance and other financial institutions ~~in collaboration with Governments~~

NBS: most of these projects are oriented to offsetting and greenwashing

4.2.6 ~~Integrate nature-based solutions into insurance policies, creating incentives for broader application of nature-based solutions in risk prevention and management.~~

~~Insurance companies and their associations; governments at all level~~

Key Biodiversity Area Partnership c/o BirdLife International

Proposed activity 4.2.1

Insert biodiversity risks in financial business accounting and analysis, in connection with environmental, social and governance (ESG) risks.

Comments: Here again the use of spatial planning for biodiversity by businesses will be important to ensure they minimise their impacts on biodiversity.

Proposals: *Insert biodiversity risks, **guided by national spatial plans for biodiversity**, in financial business accounting and analysis, in connection with environmental, social and governance (ESG) risks.*

Possible milestones: Evidence of financial institutions using spatially explicit datasets to assess risk is needed.

Proposals: Proportion of finance institutions using national spatial plans to assess risk.

Proportion signed up to IBAT to identify sites and species that increase risk.

Key actors: International Finance Corporation's Performance Standard 6 and the Equator Principles should be referenced here and be key actors

Proposals: International Finance corporation (IFC)

Equator Principles Banks, Integrated Biodiversity Assessment Tool (IBAT)

Proposed activity 4.2.4

Financial institutions exclude projects with high negative impacts on biodiversity from their financing and insurance portfolios.

Comments: It is important that spatial plans for biodiversity are used to guide where projects are excluded – maps of globally important sites such as Key Biodiversity Areas should be used to guide where exclusion occurs

Proposals: *Financial institutions **use spatially explicit plans for biodiversity and tools such as IBAT** to exclude projects with high negative impacts on biodiversity from their financing and insurance portfolios.*

Possible milestones: Evidence of financial institutions using spatially explicit datasets to assess risk is needed.

Proposals: Proportion of finance institutions using national spatial plans to exclude projects. Proportion signed up to IBAT to identify sites and species cause them to exclude projects.

Key actors: International Finance Corporation's Performance Standard 6 and the Equator Principles should be referenced here and be key actors

Proposals: International Finance corporation (IFC)
Equator Principles Banks,
Integrated Biodiversity Assessment Tool (IBAT)

Third World Network

Proposed activity 4.2.4, 4.2.5, 4.2.6

Proposals: Delete references to concepts such as 'no-net loss', 'net gain' and 'nature-based solutions' as these allow for carbon and biodiversity offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity.

United Nations Educational, Scientific and Cultural Organization

Proposed activity (4.2.2)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Insert biodiversity risks in financial business accounting and analysis, in connection with environmental, social and governance (ESG) risks. Pursue business and operational strategies grounded in solidarity economy principles, including shared governance and participation of all stakeholders, cost-saving approaches, working with nature, investing in training and dignified work, and values-aligned blended finance as a basis for ecosystems-based approach

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, financial institutions have integrated biodiversity risks in their general risk cartography and analysis based on Indigenous knowledge.

Proposed activity (4.2.3)

Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight., Biodiversity risks are incorporated in macroeconomic analysis based on Indigenous knowledge.

Proposed activity (4.2.4)

Deleted the word "high".

Financial institutions exclude projects with high-negative impacts on biodiversity from their financing and insurance portfolios

Possible milestones: Deleted the words, "nature-based solutions".

By 2024, financial institutions develop exclusion lists or other taxonomy systems in financing projects, to lower negative and increase positive impacts for biodiversity grounded on Indigenous knowledge; by 2028, they reduce portfolio risks, finance ~~nature-based solutions~~ ecosystems-based approach, and achieve net biodiversity gains in financed projects

Proposed activity (4.2.6)

Replaced "nature-based solutions" with "ecosystems-based approaches",.

Integrate ecosystems-based approaches into insurance policies, creating incentives for broader application of ecosystems-based approaches in risk prevention and management.

University of Cambridge Conservation Leadership Alumni Network

Headline action 4

Comments: Action 4.2: Financial institutions at all levels incorporate biodiversity loss in their risk analyses and have increasing net positive impacts on biodiversity, including by financing activities that can verifiably demonstrate biodiversity benefits or co-benefits.

Proposals: Action 4.2: Financial institutions at all levels incorporate biodiversity loss in their risk analyses, halt biodiversity loss and have positive impacts on biodiversity, including by financing activities that can verifiably demonstrate biodiversity benefits or co-benefits.

Action 4.3: Financial institutions apply, and promote the use of, tools such as green investments, impact loans, blended finance and parametric insurance.

EcoNexus

Headline action 4

Proposals: Action 4.3: ~~Financial institutions apply, and promote the use of, tools such as green investments, impact loans, blended finance, and parametric insurance. The efficacy of such actions needs to be demonstrated. See below for further comments~~

Friends of the Earth

Action 4.3

Comments: There is no clarity provided on what exactly those instruments are and why they would be beneficial for biodiversity.

Proposals: Action 4.3: *Financial institutions apply, and promote the use of, tools such as green investments, impact loans, blended finance and parametric insurance.*

There is no clarity provided on what exactly those instruments are and why they would be beneficial for biodiversity

NBS: most of these projects are oriented to offsetting and greenwashing

4.3.1 Promote the development and implementation of innovative financial solutions, such as green financing, large public funds and blended finance schemes, subjected to a previous full risk strategic assessment, to finance nature, including small and large-scale ~~nature-based solutions~~.

Delete this whole action proposal, as it's oriented towards promoting financial instruments and market oriented mechanism which are n for biodiversity.

NBS: most of these projects are oriented to offsetting and greenwashing

~~4.3.3 Financial institutions design market products and services to assist micro-, small and medium businesses, as well as social enterprises, in accessing green credit and blended finance options, and develop bankable projects to ensure that their activities apply nature based solutions and do not negatively impact (and preferably have net positive impacts on) nature, biodiversity and ecosystems.~~

Planet Tracker

Action 4.3
Comments: Action 4.3 recognizes some financial instruments; however, it does not encourage financial innovation.
Proposals: Action 4.3 should recognize increasing financial innovation and encourage its adoption.
Key actors: Financial institutions
Proposals: Financial institutions, governments and civil society.

Third World Network

Proposed activity 4.3.1, 4.3.2, 4.3.3
Proposals: - Delete references to ‘nature-based solutions’ as these allow for carbon and biodiversity offsetting, which do not address the real causes of biodiversity destruction, postpone action to address these, and may be harmful to biodiversity. - The use of public funds to de-risk private capital investment (blended finance) is problematic. Large amounts of public capital will be needed to leverage the desired private capital. There is no guarantee that more private capital will lead to biodiversity outcomes. Instead, there is a risk of private gains and social losses, as blended finance guarantees the incomes of investors and investment bankers, rather than peoples and nature. We suggest deletion of the term ‘blended finance’. Rather the focus should be on other ways to mobilise public funds and policies that disincentivise environmental degradation in the first place.

United Nations Educational, Scientific and Cultural Organization

Proposed activity (4.3.1)
Comments: Replaced “nature-based solutions” with “ecosystems-based approach”.
Proposals: Promote the development and implementation of innovative financial solutions, such as green financing, large public funds and blended finance schemes, subjected to a previous full risk strategic assessment, to finance nature, including small and large-scale nature-based solutions ecosystems-based approach .
Proposed activity (4.3.3)
Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight. Replaced “nature-based solutions” with “ecosystems-based approach”
Proposals: Financial institutions design market products and services to assist micro-, small and medium businesses, as well as social enterprises, in accessing green credit and blended finance options, and develop bankable projects to ensure that their activities apply nature-based solutions ecosystems-based approach and do not negatively impact (and preferably have net positive impacts on) nature, biodiversity and ecosystems. Pursue business and operational strategies grounded in solidarity economy principles, including shared governance and participation of all stakeholders, cost-saving approaches, working with nature, investing in training and dignified work, and values-aligned blended finance.
Possible milestones: Replaced “nature” with “ecosystems”. Microfinance and seed venture capital and guarantee accelerators are available for green and nature ecosystems -based start-ups.
Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Financial institutions, with support from their organizations; Governments to provide an enabling environment.

Indigenous peoples and local communities, non-governmental organizations, academia and social organizations, youth to provide guidance.

University of Cambridge Conservation Leadership Alumni Network

Headline action 4

Comments: Action 4.3.3 Financial institutions design market products and services to assist micro-, small and medium businesses, as well as social enterprises, in accessing green credit and blended finance options, and develop bankable projects to ensure that their activities apply nature-based solutions and do not negatively impact (and preferably have net positive impacts on) nature, biodiversity and ecosystems.

Proposals: UCCLAN suggests to delete the words “(and preferably have net positive impacts on)”

Action 4.4: Partnerships are established or strengthened with a view to promoting financial institutions’ commitments to biodiversity and collaboration and communication at all levels.

EcoNexus

Headline action 4

Proposals: *Action 4.4: ~~Partnerships~~ Regulations are established ~~or strengthened with a view to promote financial institutions’ verifiable commitments to biodiversity and collaboration and communication at all levels.~~*

Planet Tracker

Action 4.4

Comments: Action 4.4 recognizes the opportunities derived from partnerships but is limited to financial institutions.

Proposals: Action 4.3 should recognize the opportunities arising from collaboration not only between financial institutions but across all stakeholders.

Key actors: Financial institutions

Proposals: Financial institutions and other stakeholders.

Third World Network

Proposed activity 4.4.1

Proposals: Voluntary commitments must not substitute for governments’ legally binding obligations under the CBD. Importantly, they must not be used by corporate actors to ‘greenwash’ their activities.

United Nations Educational, Scientific and Cultural Organization

Proposed activity (4.4.1)

Actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Platforms and coalitions, such as the GPBB, Action Agenda, UNEP Financial Initiative and Natural Capital Finance Alliance, **True Cost Accounting/ TEEB** and related regional/national platforms

Strategy area III: Mainstreaming biodiversity across society

HEADLINE ACTION 5: People everywhere have relevant information, awareness and capacities for sustainable development and lifestyles that are in harmony with nature, reflecting the values of biodiversity and their central role in people's lives and livelihoods, and take gender-specific measurable steps towards sustainable consumption and lifestyles, taking into account individual and national socioeconomic conditions.

Friends of the Earth

Headline action 5

Comments: This action area seems to transfer the responsibility to individual citizens. However, large proportions of them don't have the means to take responsibility for the impact of their consumption because:

- Products have faulty certification labels
- Green products are so expensive it is above the purchasing capacity of large proportions of the population
- In many countries, sustainable options are not available

In many cases the right policies/infrastructure to ensure sustainable production-to-consumption chains is not available. Worse, policies and trade rules actually enhance long-distance trading (carbon footprint!) with unclear background of its components.

Proposals: Action area 5: Governments assure that people everywhere have relevant information, awareness and capacities for sustainable development and lifestyles that are in harmony with nature, reflecting the values of biodiversity and their central role in people's lives and livelihoods, and take gender-specific measurable steps towards sustainable consumption and lifestyles, taking into account individual and national socioeconomic conditions.

Third World Network

Headline action 5

Comments: Equity should be central in the framing of this action area. As high-income nations are the primary drivers of global ecological breakdown, they need to urgently reduce their resource use to fair and sustainable levels. See: Jason Hickel, Daniel W O'Neill, Andrew L Fanning, Huzaiifa Zoomkawala (2022), National responsibility for ecological breakdown: a fair-shares assessment of resource use, 1970–2017, *Lancet Planet Health* 2022; 6: e342–49

United Nations Educational, Scientific and Cultural Organization

Headline action 5

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight

Proposals: People everywhere have relevant information, awareness and capacities for sustainable development and lifestyles that are in harmony with nature, reflecting the values of biodiversity and their central role in people's lives and sustainable livelihoods, and take gender-specific measurable steps towards sustainable consumption and lifestyles, taking into account individual and national socioeconomic conditions.

University of Cambridge Conservation Leadership Alumni Network

Headline action 5

Comments: Action area 5: People everywhere have relevant information, awareness and capacities for sustainable development and lifestyles that are in harmony with nature, reflecting the values^[1] of biodiversity^[2] and their central role in people's lives and livelihoods, and take gender-specific measurable steps towards sustainable consumption and lifestyles, taking into account individual and national socioeconomic conditions.

[1] The intrinsic, ecological, genetic, social, economic, scientific, educational, cultural, recreational and aesthetic values of biological diversity and its components; see decision X/9, paragraph 9 (b) (ii).

[2] Sustainable Development Goal 12, Target 12.8, with amendment to reflect the role of biodiversity values and actions taken.

Proposals: UCCLAN believes that, due to the prevalence of entrenched interests, systems, and structures, individuals must not bear the burden of responsibility to make sustainable choices. Rather, we need governments shaping enabling conditions to ensure all choices are sustainable. We therefore suggest two text changes:

By 2030 Governments enable all consumption choices to be sustainable, by establishing supportive policy, legislative and/or regulatory frameworks, taking into account cultural preferences and socio-economic conditions, in order to avoid overshooting the ecological resources that Earth can regenerate.

Comments: 5.1.4 Develop and implement guidance and review existing guidance on sustainable consumption and lifestyles related to various sociocultural and socioeconomic conditions.

Proposals: UCCLAN proposes the following words: *Governments ensure and enable all choices to be sustainable and lifestyles related to various sociocultural and socioeconomic through regulation and economic incentives.*

Action 5.1: Educational institutions and other relevant bodies reflect the gendered social, cultural, intrinsic, and traditional values of nature and biodiversity in formal and informal education systems, including technical and university training, to promote understanding and provide gender-specific guidance on sustainable consumption and lifestyles and the role of biodiversity in achieving them.

Business for Nature

Comments: This action is important as it will help empowering all stakeholders to act. Especially activity 5.1.2 is relevant for business.

Proposed activities: 5.1.2 Incorporate the role of mainstreaming biodiversity and services to nature and people into education policies, curricula, and “train-the-trainer” programmes and teacher education.

Possible milestones: Educational materials on mainstreaming (individual, institutional, and societal levels) are developed and integrated into policies and curricula, reflecting the contribution of nature to health, nutrition, livelihoods and employment.

Develop training/courses on biodiversity mainstreaming as part of undergraduate and graduate programmes, elementary and high-school teacher professional development, and conferences.

By 2025, train-the-trainer programmes (courses, certificates or others) are available for teachers on mainstreaming and its lifestyle choices (purchases, transportation, etc.).

Actors: Ministries of education, science and technology cooperating with environment ministries; the education sector, **and the private sector**.

Technical and professional training institutions

Comments: It is important to acknowledge the role of the private sector, that is also providing training and education opportunities. E.g. the role of accountancy bodies for providing the training for private sector experts that is needed in relation to implementing Target 15.

Proposals: **ADD** a reference to the private sector as actor.

EcoNexus

Headline action 5

Comments: These are fine words, but meaningless if people do not have the power or the knowledge (eg: of the impacts in distant producer countries (telecoupling) and along supply chains) to move towards **sustainable consumption and lifestyles**. Without a strong framework of legislation at all levels, to control business activities, advertising and other PR activities undertaken to generate profits, people do not have the information or the power and resources to address the impact of overconsumption on biodiversity. To actually achieve this presupposes basic changes in our economic model, which means a paradigm shift. And paradigm shifts by their very nature are hard, because it is always difficult to look beyond the current paradigm to a new one.

Proposals: *Action 5.1: Educational institutions and other relevant bodies reflect the gendered social, cultural, intrinsic, and traditional values of nature and biodiversity in formal and informal education systems, including technical and university training, to promote understanding and provide gender-specific guidance on sustainable consumption and lifestyles and the role of biodiversity in achieving them.*

Friends of the Earth

<p>Proposed activity (5.1.2)</p> <p>5.1.2 Incorporate the role of mainstreaming biodiversity and services to nature and people into education policies, curricula, and “train-the-trainer” programmes and teacher education.</p> <p>Possible milestones: Multi-stakeholder platforms have serious problems with power imbalances, whereby IPLCs and other rightsholders have a lot less power, legal understanding and capacities to press their views through, than those with economic stakes. The public interest is very often not well represented.</p> <p>Proposals: By 2025, multi-stakeholder platforms, including a global CBD Liaison Group on Mainstreaming, have expanded on the experience of the Informal Advisory Group, partnerships have been fostered and action plans are being implemented.</p> <p>Participatory approaches/methods are identified and applied for the engagement of different groups of stake/rights holders taking into account their needs and cultural practices.</p>

International Indigenous Forum on Biodiversity (IIFB)

<p>Headline action 5</p> <p>Comments: By 2030, transformative education on biological and cultural diversity, languages, sustainability and heritage is integrated into school curricula at all levels and in higher education, programmes as well as promoted in informal education, with a strong focus on reconnection with nature through learning-by-doing and experiencing nature.</p> <p>Proposals: Action 5.1: Educational institutions and other relevant bodies reflect the gendered social, cultural, intrinsic, and traditional values of nature and biodiversity in formal and informal AND NONFORMAL education systems, including technical and university training, to promote understanding and provide gender-specific guidance on sustainable consumption and lifestyles and the role of biodiversity in achieving them.</p> <p>Proposed activity 5.1.3.</p> <p>Comments: Traditional knowledge is very much contextualized at the local level and based on the different experiences of communities in different types of environments. Traditional knowledge is more meaningful at the local level.</p> <p>Proposals: 5.1.3 Include, in collaboration with indigenous peoples and local communities, holistic and traditional knowledge relevant to the conservation and sustainable use of biodiversity in LOCAL TO national education policies and guidance materials that promote sustainable consumption and lifestyles.</p>
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United Nations Educational, Scientific and Cultural Organization

<p>Headline action 5.1</p> <p>Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.</p> <p>Proposals: Educational institutions and other relevant bodies reflect the indigenous, gendered social, cultural, intrinsic, and traditional values of nature and biodiversity in formal and informal education systems, including technical and university training, to promote understanding and provide gender-specific guidance on sustainable consumption and lifestyles and the role of biodiversity in achieving them.</p>
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Proposed activity (5.1.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Deleted the words “and their services”.

Proposals: Undertake and strengthen assessments of the social, cultural, spiritual **and** intrinsic values of nature, biodiversity, and ecosystems to develop behaviour change strategies which reduce demand for unsustainably sourced products and promote more sustainable lifestyles **and livelihoods**, ~~and their services~~.

Proposed activity (5.1.2)

Comments: Deleted “services to nature”.

Proposals: Incorporate the role of mainstreaming biodiversity, **ecosystems** ~~services to nature~~ and people into education policies, curricula, and “train-the-trainer” programmes and teacher education.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Ministries of education, science and technology cooperating with environment ministries; the education sector **including of indigenous peoples and local communities**.

Technical and professional training institutions.

Proposed activity (5.1.3)

Key actors: Deleted the word “relevant”

Governments, civil society organizations and academia, in close collaboration with, and with the prior informed consent of, indigenous peoples and local communities and other holders of ~~relevant~~ **indigenous and** traditional knowledge, innovations and practices.

Proposed activity (5.1.4)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Develop and implement guidance and review existing guidance on sustainable consumption, **livelihoods** and lifestyles related to various sociocultural and socioeconomic conditions.

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Research and civil society organizations, governments, in collaboration with consumer groups and indigenous peoples and local communities.

World Resource Forum, Consumers International; **Global Alliance for the Future of Food**.

Action 5.2: Governments at all levels ensure the equitable and fair use of the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities in mainstreaming, and the application of free, prior and informed consent in accordance with national legislation, and engage, incentivize, enable and empower rights- and stakeholders, such as women, youth, and indigenous peoples and local communities, to participate fully, equitably and effectively in decision-making related to mainstreaming of biodiversity.

Business for Nature

<p>This action can be strengthened by specifically adding farmers</p>
<p>Proposed activities: 5.2.1 Engage stake/rights holders, including indigenous peoples and local communities, youth, farmers, pastoralists, fisherfolk, foresters, other rural dwellers and women and their organizations, in the design and implementation of their country’s mainstreaming strategies.</p> <p>Possible milestones: By 2025, multi-stakeholder platforms, including a global CBD Liaison Group on Mainstreaming, have expanded on the experience of the Informal Advisory Group, partnerships have been fostered and action plans are being implemented.</p> <p>Participatory approaches/methods are identified and applied for the engagement of different groups of stake/rights holders taking into account their needs and cultural practices.</p> <p>Actors: Governments in close collaboration with stakeholders, such as civil society organizations, as well as rights holders, such as indigenous peoples and local communities, including farmers.</p> <p>Comments: Include farmers explicitly as one of the stakeholders after the local communities.</p> <p>Proposals: ADD “including farmers” after the local communities.</p>

EcoNexus

<p>Headline action 5</p>
<p>Other comments or proposals</p> <p>Proposals: <i>Action 5.2: Governments at all levels work with citizens to develop legislation to address the overconsumption that threatens biodiversity in a just and equitable manner along all production chains, to ensure the equitable and fair use of the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities in mainstreaming, and the application of free, prior and informed consent in accordance with national legislation, and engage, incentivize, enable and empower rights-holders and stakeholders such as women, youth, and indigenous peoples and local communities to participate fully, equitably and effectively¹¹¹ in decision making related to mainstreaming of biodiversity.</i></p>

Friends of the Earth

<p>Action 5.2.</p>
<p>Comments: FPIC needs to be applied always. National legislation should not override this.</p> <p>Proposals: <i>Action 5.2: Governments at all levels ensure the equitable and fair use of the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities in mainstreaming, and the application of free, prior and informed consent in accordance with national legislation, and engage, incentivize, enable and empower rights- and stakeholders, such as women,</i></p>

youth, and indigenous peoples and local communities, to participate fully, equitably and effectively in decision-making related to mainstreaming of biodiversity.

Possible milestones: Appropriate methodologies and key areas for national assessments are identified, having regard to deliberative and participatory processes.

Key opportunities and networks of ~~stakeholders~~ **rightsholders** for dissemination and use of the assessments are identified.

International Indigenous Forum on Biodiversity (IIFB)

Action 5.2.

Proposals: Governments at all levels ensure the equitable and fair use of the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities in mainstreaming, and the application of free, prior and informed consent in accordance with national legislation **and international obligations**, and engage, incentivize, enable and empower rights- and stakeholders, such as women, youth, and indigenous peoples and local communities, to participate fully, equitably and effectively in decision-making related to mainstreaming of biodiversity.

United Nations Educational, Scientific and Cultural Organization

Proposed activity (5.2.1)

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: Engage stake/rights holders, including indigenous peoples and local communities, youth, farmers, pastoralists, fisherfolk, foresters, other rural dwellers and women and their organizations, in the design and implementation of their country's mainstreaming strategies. **Build inclusive and participatory processes that are attentive to power asymmetries and Conflicts of Interest and use appropriate value metrics built with participatory engagement such as those used by UNEP e.g., True Cost Accounting and TEEB for Agriculture and Food.**

Possible milestones: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

By 2025, multi-stakeholder platforms, including a global CBD Liaison Group on Mainstreaming, have expanded on the experience of the Informal Advisory Group, partnerships have been fostered and action plans are being implemented.

Participatory approaches/methods are identified and applied for the engagement of different groups of stake/rights holders taking into account their needs and cultural practices, **power asymmetries in participation capacity (including language), and appropriate measures to avoid Conflicts of Interest.**

Action 5.3: People everywhere, in accordance with their gendered sociocultural and socioeconomic conditions, and with the support of organized civil society, take concrete and measurable steps to adopt sustainable consumption and lifestyles and reduce their ecological footprint, through sustainable consumption and procurement, choosing sustainable transportation, pursuing a healthy and sustainable diet, and giving preference to green jobs and business opportunities, among others.

EcoNexus

Headline action 5
Other comments or proposals
Proposals: Action 5.3: People everywhere, in accordance with their gendered socio-cultural and socio-economic conditions, and with support of organized civil society, are supported with a regulatory framework that enables them to take concrete and measurable steps to adopt sustainable consumption and lifestyles and reduce their ecological footprint, through sustainable consumption and procurement, choosing sustainable transportation, pursuing a healthy and sustainable diet, and giving preference to green jobs and business opportunities among others.

Friends of the Earth

Proposed activity 5.3.1.
By 2025, the level of understanding and awareness on the contribution of biodiversity to health, nutrition, livelihoods and employment has increased by 50%. Media behaviour change campaigns are developed to influence consumer choices. Strategies to reduce demand for unsustainably and illegally sourced wildlife resources are developed, particularly focusing on cities and towns. The availability of sustainably produced food and other products, including with some form of certification or eco-labelling , are increased for consumers in cities and towns. The amount and composition of food waste per capita and use of pesticides at the household level are reduced, and reuse and/or recycling rates increased

International Indigenous Forum on Biodiversity (IIFB)

Action 5.3.
People everywhere, in accordance with their gendered sociocultural and socioeconomic conditions, and with the support of organized civil society, take concrete and measurable steps to adopt sustainable consumption and lifestyles and reduce their ecological footprint, through sustainable consumption and procurement, choosing sustainable transportation, pursuing a healthy and sustainable diet, and giving preference to green jobs and business opportunities, among others.

United Nations Educational, Scientific and Cultural Organization

Headline action 5.3

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: People everywhere, in accordance with their gendered sociocultural and socioeconomic conditions, and with the support of organized civil society, take concrete and measurable steps to adopt sustainable consumption and lifestyles and reduce their ecological footprint, through sustainable consumption and procurement, choosing sustainable transportation, pursuing a healthy and sustainable diet, and giving preference to green jobs, **sustainable livelihoods** and business opportunities, among others.

Headline action 5.3

Comments: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

Proposals: People everywhere, in accordance with their sociocultural and socioeconomic conditions, and with support from local authorities, adopt more sustainable models of consumption, **livelihoods** and lifestyles (or make lifestyle changes towards the post-2020 global biodiversity framework). **Value through participatory engagement such as those used by UNEP e.g., True Cost Accounting and TEEB for Agriculture and Food.**

Key actors: Need additional text to be more inclusive and comprehensive. Additions provided in yellow highlight.

People everywhere, with support from Governments and with guidance from behaviour science experts, business associations or coalitions focusing on sustainable consumption, research and civil society organizations and indigenous peoples and local communities.

Cities, ICLEI, WWF network, TRAFFIC International (for wildlife); **Global Alliance for the Future of Food**

Advertising sector, media.

Consumer associations and networks.