

**Convention on
Biological Diversity**Distr.: General
30 April 2024

English only

Subsidiary Body on Implementation**Fourth meeting**

Nairobi, 21–29 May 2024

Item 10 of the provisional agenda*

Long-term strategic approach to mainstreaming**Compilation of submissions to the open-ended online forum on the draft long term strategic approach to mainstreaming and associated action plan****

Note by the Secretariat

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 (LTAM). In paragraphs 19 (b) and (c), Parties requested the Executive Secretary to further develop the LTAM in collaboration 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 outcome of this collaborative effort was considered during the third meeting of the Subsidiary Body on Implementation, and the outcome of its considerations is reflected in its recommendation 3/15.
2. In this recommendation, the Subsidiary Body on Implementation requested the Executive Secretary to conduct a peer review of the long-term strategic approach to mainstreaming biodiversity and its action plan. These submissions were made available at www.cbd.int/notifications/2022-025, and were compiled by the Secretariat in documents [CBD/COP/15/INF/10](#), [CBD/COP/15/INF/11](#) and [CBD/COP/15/INF/12](#).
3. In decision 15/17, the Conference of the Parties requested Parties, and invited other Governments, international organizations and relevant stakeholders to submit their views on the draft long-term approach and associated action plan, and to identify ways forward to support implementation of the Kunming-Montreal Global Biodiversity Framework (para. 2). It also requested the Executive Secretary to organize an open-ended online forum through the clearing-house mechanism, to facilitate further views on the reports and outcomes referenced above, and to compile these views in a report, including on an interim process, for consideration by the Subsidiary Body on Implementation at its fourth meeting (para. 3).
4. The invitation expressed in paragraph 2 of decision 15/17 was communicated to Parties and relevant organizations through [notifications 2023-028](#) and 2023-048. The Secretariat received 8

* CBD/SBI/4/1.

** The present document is being issued without formal editing.

submissions from Parties and 19 from organizations, which were made available at <https://www.cbd.int/notifications/2023-028>.

5. The open-ended online forum in paragraph 3 above was communicated to Parties, other Governments, international organizations and relevant stakeholders through [notification 2023-122](#) issued on 6 November 2023, and was extended to 10 January 2024 through [notification 2023-136](#) issued on 18 December 2023. In order to facilitate to streamline the process, the forum provided four threads that asked specific questions on the LTAM process, as follows:

(a) Is the current draft of the Long-Term Strategic Approach to Mainstreaming Biodiversity (LTAM) an acceptable basis for the continued work?

(b) What do you think needs to be done so that the LTAM works as an effective tool to implement the Kunming-Montreal Global Biodiversity Framework? What, if any, are key elements still missing?

(c) Is the accompanying Action Plan necessary and adequate for implementing the LTAM? If you believe that not, what would you propose?

(d) What process do you think would be most adequate to further advance the work on the LTAM?

6. A total of six Parties and three organizations participated in the open-ended online forum, with each providing one response to the four available threads mentioned above: Belgium, Canada, European Union, Germany, Netherlands (Kingdom of the), and Spain, as well as the Capitals Coalition, EcoNexus, and Friends of the Earth International. The present document provides a compilation of these submissions, being reproduced in the form and language in which they were received.

7. All submissions are also available at www.cbd.int/mainstreaming/ltam.

II. Compilation of submissions to the open-ended online forum on the draft long-term strategic approach to mainstreaming biodiversity and associated action plan

1. Acceptable basis: Is the current draft of the Long-Term Strategic Approach to Mainstreaming biodiversity (LTAM) an acceptable basis for the continued work?

Belgium

Belgium agrees with the points made by Spain, Germany and the European Union. Whilst we consider the current draft LTAM Strategic Approach to be an acceptable basis for the continued work that needs to be undertaken ahead of COP16, we agree that it needs to be revised and restructured to fully reflect and support the different elements of the Global Biodiversity Framework.

Belgium also agrees that it would be useful to understand the Secretariat's views on how the work under the LTAM relates to other work that is underway on tools and guidance for achieving the targets, as requested by the European Union.

Canada

Canada agrees that the overall content of the current draft of the LTAM is an acceptable basis for continued work. However, it is essential that the LTAM is updated to reflect decisions made at COP15, especially the finalization of the 23 targets. In particular, the LTAM should be revised to communicate how various Targets (e.g. 15, 16, 18) intersect with LTAM and how LTAM can help support the practical implementation of the KMGBF and its 23 targets. Canada also agrees with the European Union's comment (#3143) that the work done in notification 2023-120 should be integrated

with the LTAM as the tools and guidance from various international sources could help to support the action plan.

European Union

Yes, the European Union considers the current draft of the LTAM and the associated action plan as a good basis for the continued work. However, as the LTAM is meant to support implementation of the Global Biodiversity Framework (GBF), the current drafts should be revised, structuring all their elements along the relevant GBF targets.

With reference to notification 2023-120, we would like to ask the Secretariat to briefly set-out how the work under the LTAM would relate to other work on tools and guidance for achieving the targets, including as part of the CBD work programmes. (This could be done separately and it may not be necessary to spell this out in the LTAM itself.)

Germany

Yes, we consider the current draft as an acceptable basis for continued work. Mainstreaming biodiversity is a key determinant for achieving the goals of the convention and is part and parcel of the Kunming-Montreal Global Biodiversity Framework (GBF). In order to effectively mainstream biodiversity, the GBF needs to be fully implemented by all Parties and, likewise, its full implementation will only be possible with delivering on its many targets related to mainstreaming. The LTAM should serve to support the implementation of the GBF, hence the current draft should be revised in line with the relevant GBF targets and avoid duplications.

Netherlands

According to the Netherlands, the LTAM, and its associating action plan, is an important supporting tool to facilitate implementation, and enhance understanding of, mainstreaming biodiversity. The current draft, based on the important work of the Informal Advisory Committee on Mainstreaming, provides a good basis to continue work. The LTAM should contribute to the implementation of the mainstreaming targets of the Kunming-Montreal Global Biodiversity Framework. Using the current structure as a basis, the LTAM should be further improved through revising and restructuring the LTAM in line with the Kunming-Montreal Global Biodiversity Framework, as other colleagues have mentioned in the posts above.

Spain

Spain underlines that the process leading up to and during COP15 did not allow for a thorough discussion on the draft LTAM by Parties and stakeholders, and that the submissions that were assembled in documents CBD/COP/15/INF/10-12 were not integrated into a new proposal for LTAM, which made it more difficult for Parties to even agree on an ad interim approach at COP15. Regardless, we underline the importance of the LTAM with its actions, as presented in CBD/SBI/3/13. Therefore, we request reinserting the actions in the LTAM, namely under Headline Actions 1 to 5. All changes and text proposals made on the strategy areas for the LTAM should also apply to the Action Plan.

With these amendments, the current draft of LTAM can be considered an acceptable basis for further work. The final form of the LTAM, including its Action Plan, should be adopted at COP-16 to be used as an important tool for the implementation of the Kunming-Montreal Global Biodiversity Framework.

Capitals Coalition

Yes, we consider the current draft of the LTAM and the associated action plan as a good basis for the continued work. However, as the LTAM is meant to support implementation of the Global Biodiversity Framework (GBF), we agree with the EU, Canada, and others that the current drafts should be revised, structuring all their elements along the relevant GBF targets.

When updating the LTAM and Action Plan, it is crucial to again ensure adequate non-state actor participation, as this has proven to be one of the success factors that made the current LTAM and Action Plan work so well.

EcoNexus

No, the current draft of the LTAM is not yet acceptable. It needs to be completely rethought and rewritten, on the basis of discussions involving all sectors of society, especially Indigenous Peoples, women, local communities and small/peasant farmers, which is one reason why both UNDRIP and UNDROP should be part of those discussions.

The CBD Secretariat should organise these discussions as soon as possible, to take place well before SBI-4, so that a new draft LTAM based on them can be produced in good time.

The challenges are immense and the CBD needs to be more outspoken on the importance of biodiversity and should be a stronger advocate for biodiversity and ecosystem functions within the UN and globally. The CBD should be strongly aware of and resistant to all the false solutions being proposed with the aim of avoiding real change, especially to the current economic model. It must work with other UN bodies to counter the growing strength of corporate interests within the CBD and across the UN.

Friends of the Earth International

FOEI believes that the current draft of the LTAM lacks the necessary emphasis on the regulation of businesses which are damaging to biodiversity. Only through coordinated regulation by all states can the negative spiral of business impact on biodiversity and human rights violations – often of those who defend biodiversity- be stopped. The LTAM will need to elaborate much more on this to have credibility.

All the sections that include voluntary measures by business will need to be revised, as many of them have a terrible track record in solving the problems at hand; on the contrary, they often worsen them. The LTAM needs to be based on measures with a proven track record of effectively improving biodiversity.

Therefore, the current draft of LTAM is not an acceptable basis

2. **Effectiveness of LTAM: What do you think needs to be done so that the LTAM works as an effective tool to implement the Kunming-Montreal Global Biodiversity Framework? What, if any, are key elements still missing?**

Belgium

Belgium agrees with comments from the EU, Spain and Germany regarding the need to ensure that the LTAM explicitly addresses the most relevant sectors for implementation of the GBF and does so in a way that ‘speaks’ to those sectors, making it relevant to them and helping Parties and other stakeholders to better understand sectoral implementation of all the goals and targets of the GBF.

Belgium supports the points raised by Spain regarding the need to coordinate the mid-term review of implementation of the LTAM and its Action Plan with the reporting, monitoring and review process for the GBF to avoid creating additional and potentially duplicative burdens.

We also agree with Spain that it would be helpful to ensure alignment of the LTAM with the resource mobilization strategy to ensure that the necessary alignment of financial flows is also taken into account.

Canada

First, as mentioned in the previous questions, the tools and guidance resources from notification 2023-120 should be integrated, or at the least referred to in the Action Plan as the work is complementary to the content of the LTAM and Action Plan. Secondly, we suggest that the LTAM identify targets that are supported by the actions suggested. These measures would help to bolster

the actions proposed and encourage Parties to implement the actions, as they will be able to see how these activities could be an efficient way to address multiple targets simultaneously. Finally, certain deadlines that are in the Action Plan (e.g. milestone for 1.2.4) will need to be adjusted and/or updated to reflect the decisions from COP15 and KM-GBF.

European Union

For fostering effective implementation, the European Union would like to propose the following:

The LTAM should focus not only on cross-sectoral, horizontal matters, but also explicitly address the most relevant sectors as identified in the IPBES Global Biodiversity Assessment 2019 and previous COP-decisions, and as they were meant to be included in the glossary for the GBF.

The LTAM should support and encourage implementation not only through CBD processes and ministries of Environment, but also through other relevant processes and forums, including by involving ministries other than those for environment, as well as sectoral organisations and business federations. Duplications should be avoided. Cross-linking relevant communities of practitioners should be encouraged. To this purpose, it would be useful to have an up-to-date online calendar with relevant events at global and regional scale, as well as moderating and feeding a ‘community of practitioners’. The LTAM, or the CBD COP Decision on the LTAM, could request CBD Secretariat to undertake such activities.

Since the LTAM helps implementing the GBF, implementation of the LTAM should be fully covered by / linked to the CBD processes for planning, monitoring, reporting and review, including the further development of the monitoring framework, revision of NBSAPs, submissions of national targets, national reports and the global assessment of implementation.

Germany

The LTAM should support and encourage implementation also through processes and forums beyond the CBD, including by involving ministries other than those for environment, as well as sectoral organisations and business federations, in line with the whole-of-government and whole-of-society approach enshrined in the GBF.

Since the LTAM supports the implementation of the GBF, the LTAM should be fully integrated into (and not parallel to) the CBD processes for planning, monitoring, reporting and review, including the further development of the monitoring framework, revision of NBSAPs, submissions of national targets, national reports and the global assessment of implementation.

In order to avoid duplications it is important to stress the mutual supportiveness with other frameworks. Therefore, in terms of mainstreaming biodiversity the LTAM should follow up on synergies for instance with FAOs Action Plan for the implementation of the Strategy on Mainstreaming Biodiversity across Agricultural Sectors (<https://www.fao.org/documents/card/en/c/cb5515en>), the Framework for Action on Biodiversity for Food and Agriculture (<https://www.fao.org/documents/card/en/c/cb8338en>) and the recently launched Biodiversity Knowledge Hub (<https://www.fao.org/biodiversity/knowledge-hub/en>). The Hub will provide tools and resources to member states to strengthen their capacity to mainstream biodiversity and assist national stakeholders to implement and monitor the KM-GBF.

Netherlands

The Netherlands aligns with the submissions of the EU Commission, Spain, Germany and Belgium. A strong link between the LTAM and the goals and targets of the KMGBF is key to provide tools for implementation. Therefore, the LTAM should be updated in this regard, taking into account the mainstreaming targets and the mainstreaming elements in other targets. The sectors with the highest impact on biodiversity, as identified in the IPBES Global Biodiversity Assessment 2019 and previous COP-decisions, that were agreed to be included in the glossary for the GBF should be addressed.

Furthermore, the Netherlands agrees with Germany that the LTAM should facilitate the whole of government and whole of society approach, involving relevant actors and stakeholders to increase the uptake and use of the LTAM once agreed.

Monitoring should be aligned with the LTAM should be integrated into the CBD processes for planning, monitoring, reporting and review and not have a separate, parallel, process.

The Netherlands also agrees with Spain and Belgium that it would be helpful to ensure alignment of the LTAM with the resource mobilization strategy to ensure that the necessary alignment of financial flows is also taken into account.

Spain

Spain sees the LTAM as a supporting tool for Parties and other stakeholders to implement all of the goals and targets of the Kunming-Montreal Global Biodiversity Framework (especially the targets serving as supporting tools for implementation such as targets 14, 15, 16, 18, 19, the targets on reducing threats to biodiversity such as targets 1, 5 and 7 and on sustainable use such as targets 9, 10, 11 and 12).

We stress that the mid-term review of the implementation and monitoring of the LTAM, its action areas and headline actions, as well as its Voluntary Action Plan should be consistent and integrated within the foreseen planning for reporting, monitoring and review of the KMGBF in line with CBD COP Decision 15/6, including the revision of NBSAPs and the submission of national targets.

We would propose to add a section in the LTAM which addresses the most relevant sectors for mainstreaming of biodiversity in line with the IPBES Global Biodiversity Assessment 2019 and previous COP decisions, in order to establish a clear link with the relevant targets, including target 14, and clearly point out the sectors agreed to be part of the Glossary at COP15.

We would ask the Secretariat to do the exercise of analyzing the convergence and differences between the LTAM and the KMGBF, including the alignment with a global resource mobilization strategy that also takes into account the necessary alignment of financial flows.

Capitals Coalition

To ensure the effectiveness of LTAM, we think the following three steps should be considered:

1. Integrating LTAM and its Action Plan into the CBD Guidance on GBF Targets and in the CBD Guidance on NBSAPs.
2. Integrating LTAM and its Action Plan into (and not parallel to) the CBD processes for planning, monitoring, reporting and review, including the further development of the monitoring framework, revision of NBSAPs, submissions of national targets, national reports and the global assessment of implementation.
3. Updating LTAM and its Action Plan, to ensure full alignment with the agreed GBF. (Recognizing that this step might need updates on step 2 and 3. However, in order not to lose time, we suggest to start with steps 1 and 2 immediately)

EcoNexus

The LTAM needs to be redrafted and Parties and Observers from civil society, IPLCs, women, small farmers must play a far more active role in its redevelopment.

Key elements still missing from the LTAM.

In order to stop the accelerating destruction of biodiversity, what is required is strong regulation at all levels, national, regional and global, 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 at national, regional and international level is the only way we can make the mainstreaming of biodiversity meaningful and Parties urgently need to collaborate to develop such regulation.

We also need to decide who will independently examine and verify claims made by business that they are protecting biodiversity and how this will be done.

Another problem with the draft LTAM and Action Plan (also true again of targets 14-16 of the GBF) is that they treat government, business and society separately, without addressing the relationships and power imbalances between them. We urgently need to regulate business and finance effectively in order to reduce their damaging impacts on biodiversity, climate and people – and also on the authority and powers of governments.

Furthermore, the LTAM currently does not properly 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 drivers are basic to our current economic system that requires endless growth in production, exploitation and consumption.

The aim of the LTAM should be to change the current discourse so that the vital importance of biodiversity, the interrelationships between biodiversity loss and climate change, and the vital role of biodiversity in providing some protection against the worst impacts of climate change, are central to it.

The LTAM should also indicate clearly that major changes are needed to our current economic system based on growth if the planet is to be habitable for future generations.

Internationally, we hear climate change cited constantly but biodiversity far less so. The discourse about both and their interconnectedness needs to be central and effective within the policies of governments and the global debate. This also demands explanation to all levels of society to show how fundamental biodiversity and healthy and resilient ecosystems are to all aspects of our lives and those of future generations.

The CBD must lead the way to make this happen. This is what biodiversity mainstreaming should mean.

Friends of the Earth International

FOEI warns that the current LTAM relies too much upon voluntary measures by corporations. State regulation of business impact on biodiversity is largely missing.

Yet, coordinated regulation between states globally makes it possible to limit the impacts on corporations. As long as states play the card of “attracting investment” through a low degree of regulation, this affects not only the environment in that country but also pushes other countries into the same negative spiral.

Breaking through this spiral can only happen when regulation is coordinated globally. The CBD has a vital role to play in organising this. It should also alert where institutions – such as the World Bank, IMF or other development banks- push global policies in the wrong direction.

The LTAM should include pathways that institutionalise this role of global coordination of biodiversity-related regulation.

The LTAM should also institutionalise the revision of the measures it is promoting. There are severe concerns that several of the measures currently included in the LTAM will negatively impact biodiversity and IPLCs who guard biodiversity.

- Regular revision if the measures implemented improve biodiversity and the rights of IPLCs, who are the best guardians of biodiversity.
- continuous follow-up on the implementation in the countries, with specific emphasis on the policy elements implemented by governments

- follow-up on the effectiveness of measures implemented in previous mainstreaming decisions, particularly for the sectors identified by IPBES as having a high impact on biodiversity. In those sectors where the impact has increased over the last five years:
 - o evaluate if the approved measures were implemented,
 - o evaluate if the implementation did have the intended effects
 - o evaluate whether implementation needs to go up or measures need to be changed.

3. **Action Plan: Is the accompanying Action Plan necessary and adequate for implementing the LTAM? If you believe that not, what would you propose?**

Belgium

Like Spain, Germany and the European Union, Belgium sees the value in the accompanying action plan and considers that this could be a useful tool to help Parties and stakeholders ensure that mainstreaming actions are fully taken into account. Belgium agrees with Canada that certain changes should be made to reflect the work that has been completed in the interim, such as the proposal to incorporate into the action plan the resources which have been collected from notification 2023-120 on tools and guidance, and to also communicate in the text that the action plan is understood to be a voluntary set of actions.

Belgium also agrees that the Action Plan could be integrated within the LTAM itself to avoid having too many separate documents.

Canada

Canada believes that the action plan is necessary for the implementation of the LTAM, however certain changes should be made to reflect the work that has been completed in the interim. First, the action plan is understood to be a voluntary set of actions, as such, it should be communicated in the text. Second, as stated in the previous question (Acceptable Basis), Canada proposes that the resources collected from notification 2023-120 (tools and guidance) should be incorporated into the action plan.

European Union

The LTAM should be concrete and actionable. Therefore, the European Union favours integrating the relevant actions directly into the LTAM. Several relevant actions, tools and initiatives could (also) be incorporated or referenced in the guidance notes on the GBF targets that are available on the CBD webpage (e.g. under 'F – relevant resources that can assist implementation').

Germany

The LTAM should be concrete and actionable. Therefore, integrating the relevant actions directly into the LTAM could be an option to reduce the number of documents. Several relevant actions, tools and initiatives could (also) be incorporated or referenced in the guidance notes on the GBF targets that are available on the CBD webpage (e.g. under 'F – relevant resources that can assist implementation').

Netherlands

Like Canada, Spain, Germany, the European Union, and Belgium, the Netherlands regards it important that the LTAM is an actionable document so that it facilitates implementation. The Voluntary Action Plan could work in the current format or integrating the main elements in the LTAM itself to have just one document.

Spain

Spain considers that the Action Plan should be used as a voluntary guidance tool and encourage Parties and relevant stakeholders to take into account the catalogue of possible mainstreaming actions.

The Voluntary Action Plan could work in the current format or integrating the main elements in the LTAM itself to have just one document.

Capitals Coalition

Like Canada, Spain, Germany, the European Union, and Belgium, as an observer to the CBD the Capitals Coalition sees the Action Plan accompanying the LTAM as a necessary element, as it makes LTAM concrete and actionable. Of course, we see a need to update the Action Plan on the basis of the Kunming-Montreal agreement and we would like to urge the CBD and its Parties to ensure participation of non-state actors in that process. Also, we agree with the EU that the Action Plan contains elements that could be directly integrated in guidance notes on GBF targets, as this would really mainstream the mainstream agenda.

EcoNexus

No, the current Action Plan is neither necessary nor adequate for implementing the LTAM. First we need major revision of the LTAM with far great participation from Parties, civil society, in particular women, IPLCs, and small farmers who feed millions of people without destroying biodiversity. Then we should write a completely new Action Plan that genuinely reflects the urgency and primacy of the biodiversity issue.

The development of the current Action Plan in particular was dominated by business interests.

An extract from the current draft Action Plan shows some of the business interests and coalitions playing an active role in the discussions:

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).

These groups need to be regulated by government in the interests of people and biodiversity, not allowed to dominate the mainstreaming discussion in their own interests.

The fact that they are dominating it, means that the LTAM and Action Plan in particular both have many references to offsetting, voluntary commitments, etc:

No net loss/net gain, ecosystem accounts, natural capital accounting, biodiversity offsets and compensation mechanisms, voluntary certification, voluntary climate and biodiversity commitments, biodiversity metrics, payment for ecosystem services (PES), multi-stakeholder platforms, ...

The Action Plan should therefore be put aside while we rewrite the LTAM, after which a new Action Plan can be developed.

Its development should involve all sectors of society because we depend on biodiversity for life, and the threats to biodiversity and ecosystems, particularly to the poor and disadvantaged, are materialising faster than most expected. This means that we need urgent collective action, according to CBDR, to correct power imbalances, inequity and injustice at all levels.

Above all, biodiversity and ecosystems must not be exploited for offsets or carbon markets, which are a means to delay the reduction of climate forcing emissions. This is currently the strategy of a number of major emitters.

Nor must biodiversity and ecosystems be monetised (eg: through natural capital accounting) as a potential precursor to marketing them more widely – for example through Natural Asset Companies, which the New York Stock Exchange has been considering for listing. Since scarcity often increases market value, degrading ecosystems could increase the market value of those which remain more

intact, something which could benefit investors in the short term while further undermining the planetary systems on which all life depends.

Friends of the Earth International

FOEI believes that, as the current LTAM is found to be insufficient and, in many parts, inadequate, it needs to be significantly reworked. No Action Plan can be approved without a further process after the approval of the LTAM.

However, given the difficult timelines and the fact that many of the measures in the Action Plan are controversial, it may be better to decide NOT to have an Action Plan at all.

In any case, greenwashing measures should be removed from the text. Examples are all offsetting proposals (including “No Net Loss”, “Net Gain”, “Nature Positive” and “Biodiversity Credits”), certification organised by corporate controlled platforms, multistakeholder platforms, and corporate social responsibility

4. Suggested process: What process do you think would be most adequate to further advance the work on the LTAM?

Belgium

Like Spain, Germany, the European Union and Canada, Belgium would support a peer-review process of a revised and updated draft LTAM and Voluntary Action Plan, considering previous submissions and submissions by Parties and stakeholders in response to notification 2023-028, along with the outcome of the open-ended Online Forum. This needs to be done in good time before SBI-4 to enable a meaningful discussion at SBI and adoption of a final version of the LTAM at COP16. We also agree that an informal exchange facilitated by the SBI chair ahead of SBI-4 could be very useful. We echo the importance of giving mainstreaming and the LTAM high priority and sufficient time at SBI-4. Finally, we would like to support the request for meaningful involvement of relevant stakeholders.

Canada

Canada agrees with previous posts that the LTAM should be put for peer-review as soon as possible, and a revised version be presented for consideration by Parties at SBI-4.

European Union

We consider it very important to submit the draft LTAM for peer review in view of a revised draft to be discussed at SBI4. The European Union would also welcome further informal discussions with Parties and rights and stakeholders, including at SBI-4.

Germany

With the successful adoption of the GBF and only seven years to achieve its 2030 targets, it is high time that we also deliver on the momentum and outcomes of COP13 and COP14 on mainstreaming and adopt the LTAM at COP16. Therefore, we consider it very important to submit the draft LTAM for peer review, in order to discuss a revised draft at SBI 4. To allow for thorough and fruitful discussions, we urge that mainstreaming and the LTAM are accorded high priority on the agenda of SBI-4 and that the Secretariat include a proposal for a revised draft in the preparatory document for the respective agenda item of SBI-4.

Netherlands

In line with previous posts from the EU Commission, Spain, Germany, Canada and Belgium, The Netherlands is in favor of aligning the LTAM with the GBF, while taking into account previous work and previous submissions. This updated LTAM should be shared through a peer-review of the draft LTAM, after which the secretariat can produce an updated LTAM to be shared well in advance of SBI4, for discussion at SBI-4. At SBI-4 there should be sufficient time to discuss the updated LTAM. Furthermore, the Netherlands regards it important to have a deeper exchange between parties, and to have meaningful involvement of rightsholders and stakeholders, preferably ahead of SBI-4.

Spain

Spain would support a peer-review process of a revised and updated draft LTAM and Voluntary Action Plan, considering previous submissions in CBD/COP/15/INF/10, CBD/COP/15/INF/11 and CBD/COP/15/INF/12, as well as the submissions by Parties and stakeholders in response to notification 2023-028 and the outcome of the open-ended Online Forum, in good time before SBI-4. We encourage an additional activity as part of the “interim process” to enable deeper exchange between and among Parties and stakeholders on the LTAM, e.g., in the format of an informal exchange on mainstreaming before SBI-4 chaired by the SBI Chair (tentatively in early Spring 2024). Spain encourages to give high priority to the LTAM during SBI-4, allowing appropriate discussions to make real progress before COP-16.

We could also support the establishment of an ad hoc technical expert group (AHTEG) to advise the Parties, Bureau, and Secretariat on the implementation and review of LTAM, and to collaborate with other AHTEG, such as CBD AHTEG Indicators.

Capitals Coalition

Like Spain, Germany, the European Union and Canada, and Belgium, we would support a peer-review process of a revised and updated draft LTAM and Voluntary Action Plan, considering previous submissions and submissions by Parties and stakeholders in response to notification 2023-028, along with the outcome of the open-ended Online Forum.

The updating-process as well as the peer-review process should include full participation of non-stake actors. For the updating-process, we suggest considering to invite members of the previous informal working group on mainstreaming to contribute.

EcoNexus

We consider the LTAM to be a useful beginning, but the current draft needs to be completely rewritten before SBI-4, with much wider participation from Parties, civil society and IPLCs, including small farmers. These revisions must reflect the fact that biodiversity destruction and climate change are accelerating and interacting in ways that reveal that we have to move quickly and decisively to mainstream biodiversity in time to avoid catastrophic impacts.

Yet, as a member of the Informal Advisory Group on mainstreaming, I saw how comparatively little involvement there was from civil society, IPLCs and Parties and how deeply business was involved. This means that the current drafts of the LTAM, and the Action Plan in particular, are greatly influenced by business interests.

True biodiversity mainstreaming demands immediate reductions in both biodiversity destruction and climate forcing emissions, but many business interests fear that this could damage their profits, hence the promotion of offsets, carbon markets etc as a means to delay real action for as long as possible.

Currently there is a real risk that biodiversity and ecosystem functions, plus the indigenous peoples and local communities whose cultures, practices and knowledge are so vital to healthy ecosystems, will simply continue to be exploited for extraction and to offset continued climate forcing emissions. This is unacceptable. We also have to be aware that the promotion of carbon markets is an entry point for geoengineering projects, strongly promoted at COP28 of the UNFCCC.

Scientists agree that change is happening faster than previously thought, which makes immediate action all the more important.

The CBD must play a leading role at all levels to address this, with the participation of all sectors, especially those closest to biodiversity and ecosystems, and that is what biodiversity mainstreaming should mean.

Friends of the Earth International

Friends of the Earth International is concerned about the current LTAM and Action Plan. They have never been discussed in depth by parties nor been peer-reviewed to ensure the scientific coherence of the measures. Many civil society organisations, backed up by scientific evidence, consider several of the LTAM and Action Plan measures counter-productive.

Therefore, a scientific and party peer review of the whole text should be done. Previous experiences of proposed measures must be reviewed, and their effectiveness must be assured.

Based on such a review, it is highly likely that a new text will need to be drafted. If the basis would be the current text, it would require significant possibilities for in-depth discussion and negotiation.

In no case should the LTAM be approved as a package without discussion and negotiation on each of the measures. The development of the Action Plan should be done at a later stage than the LTAM. One can only build consensus on the implementation actions of a strategy when the strategy itself has been adopted. Working otherwise would be counterproductive.

Even though we are aware that the timeframe is short, we consider it paramount to adopt the right decisions rather than following the urgency. The LTAM, as it stands, risks significantly worsening the situation of biodiversity.

We also caution that the interest in the current mainstreaming work is almost exclusively by developed country parties. Any process -including the decisions on ways forward- would need the active involvement of developing country parties.
