



24 February 2021

World Federation for Animals Statement Informal Session of SBSTTA-24"

Agenda Item 3: post-2020 Global Biodiversity Framework

COVID-19 has highlighted more than ever the interlinkages not only between human, environmental, and animal health, but also human, environmental, and animal *wellbeing*. Our current relationship with nature and animals is broken, with biodiversity loss and climate change accelerating and the risk of future pandemics remaining unaddressed in policy. Only by protecting and healing our relationship with animals and nature can we ensure the thriving of human life in the post-pandemic era. By healing these relationships, we position ourselves to eliminate poverty, achieve food security and protect human health, and ensure the benefits of a healthy and thriving environment and biodiversity for all peoples.

The Convention on Biological Diversity has a key role to play in contributing to progress on these issues and so it is critical that the global biodiversity framework is ambitious and fit for purpose in light of our new paradigm. Therefore, we are concerned that discussions on the monitoring framework are superseding the negotiations that should be taking place on the structure of the framework of goals and targets itself. It seems that parties are "not seeing the forest for the trees", as it were, and encourage more opportunities to refine the goals and targets themselves before Open-Ended Working Group 3.

Target 4

The commercial wildlife trade poses a grave risk - not only to biodiversity - but to our own wellbeing and health. COVID-19 has had a huge impact on the global economy and set sustainable development back by years in many dimensions. As Dr. Jane Goodall wrote recently in the foreword to the [Animals' Manifesto](#), "How shocking to realize that we brought this on ourselves! Through our disrespect of the natural world, and our disrespect of animals." We cannot continue to flirt with future pandemics by failing to effectively reduce the commercial trade of wild animals. It is not possible to sanitize the trade simply by adding the word "safe".

Numerous recent reports take a clear-eyed approach to the wildlife trade, including UNEP's *Preventing the Next Pandemic*, the IPBES pandemics report, and Global Biodiversity Outlook-5,

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which recognize that both the legal and illegal trade pose risks for zoonotic disease transmission.

The Dasgupta review in particular calls for a precautionary approach to the commercial trade. The current approach of Target 4 begs the question--what is the utility of considering the commercial trade as contributing to benefit-sharing when it shares those benefits with only a subset of the world's population involved in the trade at the expense and risk of the global population?

We are concerned about the application of the word "safe" to this target and its indicators because "safe" is undefined. What criteria will be used to define the safety of trade in a given species, and who will make this recommendation? How will parties implement and enforce this advice? How granular will assessments of safety be? How unsafe does trade in a species have to be before ending the trade of that species?

The same questions exist for determining the sustainability of trade in species. With regards to sustainability, sustainable use and promotion of use *carte blanche* appear to be conflated. The focus of sustainable use should be on ensuring functional and thriving ecosystems rather than maximization of use that could be considered sustainable, as the latter has the potential for manipulation which encourages overexploitation.

Instead, we urge a precautionary approach to the commercial trade of wild animals. This approach should substantially curb the wildlife trade and phase out uses of wild animals that are not essential, while respecting the cultures and traditions of Indigenous Peoples and Local Communities. In doing so, it is critical that resources are allocated to ensure a just transition from livelihoods that rely on the commercial trade of wild animals, to livelihoods that can be considered truly safe from pandemic risk - protecting both biodiversity and human health for years to come.

Lastly, we recommend amending the wording of this target from "harvest" to "exploitation". Harvest is appropriate for flora, but not applied to animals that are recognized as sentient in the World Organisation for Animal Health's Global Animal Welfare Strategy, the Treaty on the Functioning of the European Union, the African Union's Animal Welfare Strategy for Africa, as well as a number of countries in their national legislation. Exploitation is more accurate and in line with the IPBES Global Assessment.

Target 9

We are concerned about the wording of this target and indicator 9.0.1, which calls to "[reduce] productivity gaps by at least [50%]". This language opens the door to many types of approaches, like intensification, which could reduce productivity gaps, but which come with major drawbacks in other respects such as reducing pandemic risk and livelihoods. Intensification was identified as a driver of pandemic risk in UNEP's report on pandemics and

tends to result in reduced employment, low wages, and unsafe working conditions as highlighted in the CFS HLPE Report 10 on sustainable livestock. Therefore, more clarity is needed to define the types of systems that are considered sustainable. Agroecological and regenerative agricultural systems should be encouraged. We also recommend the recent Chatham House report on Food System Impacts on Biodiversity Loss for more information.

Ultimately, we believe the focus of this target should be on ensuring the sustainability of agricultural systems rather than the productivity of agricultural systems. We already produce enough food for the world's population, but problems at various points of the distribution and supply chain mean that this food is not distributed as needed. This aspect of the problem, while important and substantial, is likely beyond the remit of the CBD.

Target 9.1.4 is problematic because of its vagueness. It refers only to aquaculture production. Increased aquaculture production seems to be assumed to be a contributor to the implementation of Target 9, but in reality, this overlooks possible impact on biodiversity by aquaculture, including pollution and disease transmission to wild populations. Instead, the percentage of wild fish stocks at healthy levels could be used as an indicator.

Target 15

As outlined in the Chatham House report, dietary change is one of the key levers to reduce the food system's negative impact on biodiversity. This dietary transition away from heavy meat and dairy consumption is an important component of sustainable consumption and should be better reflected in the indicators for this target. In addition to component indicators on food loss, we recommend a component indicator on the footprint of food consumption patterns.

Target 17

While we in general welcome the content of Target 17 and its headline indicators, we would recommend the removal of the word "most" from "most harmful subsidies". This is because the inclusion of this word obscures the target, as it could be argued that certain subsidies are not the "most" harmful and thus remain intact. All subsidies that harm biodiversity must be addressed and eliminated.