## TEMPLATE FOR COMMENTS AND ADDITIONAL VIEWS ON DRAFT DOCUMENTATION FOR SBSTTA-19

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| Comments on the draft documentation for SBSTTA-19 | | |
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| **Page** | **Paragraph** | **Comment** |
| General | | Japan attaches the importance, and supports to maintain the consistency of proposed indicators and IAEG-SDGs indicators as outlined in the draft document. |
| 21 | Target 20 | Japan proposes to delete "Global funds committed towards environmental policy, laws regulations and economic instruments" from the indicator list. Financial commitments are merely pledges, and reviewing the implementation of Target 20 should be based on actual financial flows. |
| | | Japan does not support to single out only ODA for Target 20 indicators, therefore proposes to add all indicators as agreed in paragraph 7 of decision 3 of COP10. |
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| **Page** | **Paragraph** | **Comment** |
| 11 | Annex | **Comment on an indicator " Funds towards institutional capacity-building in fishing "**<br>The definition of "fund towards institutional capacity building" is unclear. The clarification about its definition is necessary. |
| 11 | Annex | **Comment on an indicator "Fisheries subsidies"**<br>Although "fisheries subsidies" is discussed in the WTO, consensus has not yet been formed about the definition and rules of it. |
| 11 | Annex | **Comment on an indicator " Government financial transfers to fisheries "**<br>Although it is discussed in the OECD, consensus about the detailed definition has not yet been formed and the definition is still abstract. In addition, the member country for OECD meeting is limited to the OECD countries, although some non-member countries join as observers.<br>For those reasons, the further discussions in the expert meeting are necessary, before the CoP adopts indicators listed above. |
| 13 | Annex | **Comment on an indicator "Red List Index for seabirds"**<br>Fishing is not only one reason to affect the number of sea birds. When Red List Index for seabirds is used as an indicator, it is necessary to consider factors other than fishery to decrease the number of seabirds, e.g. the impacts by predators, destruction of nesting places by developments. |
| 13 | Annex | **Comment on an indicator "Wild Bird Index for habitat specialists"**<br>Fishing is not only one reason to affect the number of sea birds.  When Wild Bird Index is used as an indicator for habitat specialists, it is necessary to consider destructions of the nesting places by the development, because it has huge impact on the decrease in the number of habitat specialists. |
| 13 | Annex | **Comment on an indicator "Wild commodities index"**<br>The Wild commodities index is not appropriate as an indicator, because the concept of the wild commodities index is still under discussion. |

| 13 | Annex | **Comment on an indicator "Primary Production Required (PPR) to sustain global marine fisheries landings"** <br> PPR fluctuates due to the trophic level of the harvested fish and total amount of catch. Because target species is decided by socioeconomic factors such as the taste of consumers and price as well as stock status, the catch volume of fish in each trophic level and total amount of catch are affected by same factors. Therefore, PPR is not an appropriate indicator. |
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| 13 | Annex | **Comment on an indicator "Estimated fisheries catch and fishing effort"** <br> The estimated fisheries catch is affected by socioeconomic factors such as a taste of consumers and price as well as a stock status. Therefore, a stock trend is a better indicator than "estimated fisheries catch and fishing effort". |
| 13 | Annex | **Comment on an indicator "Temporal trend showing the annual quantity (million tonnes) of fisheries production destined for export"** <br> The fisheries production for export is affected by socioeconomic factors such as a taste of consumers and price as well as a stock status. Therefore, it is inappropriate to use it as an indicator. |
| 13 | Annex | **Comment on an indicator "Global expansion of bottom trawling"** <br> The fishing activities by bottom trawling does not necessarily induce the destruction of marine ecosystem. Not only bottom trawling but also all fisheries may affect the marine ecosystem including all fish and invertebrate stocks and aquatic plants", if are not managed appropriately. <br> Trawl fisheries are relatively well managed fisheries, such as setting of total allowable catch based on stock assessment and establishing marine preserve. Also, some trawl fisheries got MSC and other types of certifications. |
| 13 | Annex | **Comment on an indicator "Trend in MSC certified fisheries, tonnage and improvements"** <br> Trend in MSC certified fisheries, tonnage and improvements is an inappropriate indicator. As for the fishery products certification system, it is true that many fisheries get the MSC certification, but there are a lot of certification systems other than MSC in the world. <br> In addition, many fishermen do not try getting fisheries production certification due to the high cost with small benefit, even if their fishing operations are conducted in a sustainable manner. |
| 14 | Annex | **Comment on an indicator "Total fisheries and aquaculture production"** <br> Total fisheries and aquaculture production is affected by socioeconomic factors such as a taste of consumers and price as well as a stock status. Therefore, it is inappropriate to use it as an indicator. |
| 14 | Annex | **Comment on an indicator "Aquaculture certification"** <br> There are many fishery production certification programs. However, many fishermen do not try getting fisheries production certification due to the high cost with small benefit, even if their fishing operations are conducted in a sustainable manner. Therefore, it is inappropriate to use it as an indicator. |
| 17 | Annex | **Comment on an indicator "Capture of marine and coastal ecosystem services within Global MPA network"** <br> Capture of marine and coastal ecosystem services within Global MPA network is obscure because contents are covered a lot of ground and it is necessary to clarify the definition. |
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## Comments on the draft documentation for SBSTTA-19

| Page | Paragraph | Comment |
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| 5 and 8 | Target 1 of Annex and Paragraph 26 | Regarding Aichi target 1, people often focus on public awareness about the keyword of "biodiversity". However, we are not sure if the people who are aware of this concept are actually friendly towards biodiversity in their usual life. Thus, analyzing a relation between the two indicators, trend in awareness about biodiversity vs. that in attitudes to biodiversity, should be conducted. As well, if the two indicators show similar trends with each other, possibly we could delete one of the two indicators for our future efficient assessments. As such, it is worthwhile to understand relationships including cause-and-effects or overlaps (co-linearity) between/among multiple indicators of each target. Thus, we suggest this challenge to be tackled in the future in the paragraph of 29. In the section IV or somewhere. |
| 10 | Between "Biodiversity Barometer" and "*Greendex*" | As submission of Japan to notification 2015-045, information of the number of people who are aware of or not aware of biodiversity could be collected through, such as, opinion poll. However, it would be difficult to measure levels of awareness and attitudes on biodiversity as they are varied to each person. For example, even if a person was aware of the importance of biodiversity and was taking some actions to conserve biodiversity, it would be difficult to compare how much s/he would be aware of it and contribute to conservation with another person who was also aware of and was taking actions for conservation of biodiversity. Also, it would be necessary to understand how much people care about or take actions for biodiversity compared with other subjects such as poverty and wars. Therefore, we would like to suggest developing an indicator which can measure the levels of awareness and attitudes on biodiversity. |
| 11 | "Funds for environmental impact assessment" | It would be difficult to comprehend the budget of local governments and private sectors for environmental impact assessment. Therefore, Japan would like to suggest to replace this indicator with "Number of countries institutionalizing environmental impact assessment". |

| 13 | "Wild Bird Index for habitat specialists" | We would like to know whether this index in this section (i.e. under "trends in population of target and bycatch aquatic species) is limited to marine or aquatic only. |
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| 15 | "Cumulative number of species introductions" | If the headline indicators of the second column are listed in consecutive order, it would be better to move "Trends in number of invasive alien species" to above "Trends in the economic impacts of selected invasive alien species". The consecutive order would be to analyze the trends in number of invasive alien species at first, and then, to consider the trends in the economic impacts of selected invasive alien species. |
| 15 | "Ballast water treatment" | "Ballast water treatment" does not sound as an indicator, therefore, we would like to suggest to change it to "Status of formulation of laws and/or systems related to ballast water treatment". |
| 16 | "Coral reef cover" | This name should be corrected to "Coral cover" i.e. "reef" should be deleted from "Coral reef cover"<br>Also, we would like to suggest adding "Reefs at Risk" which includes effects of both terrestrial burden and climate change. (Reference: http://www.wri.org/our-work/project/reefs-risk ) |
| 17 | "Red List Index" | We wonder if this Red List Index refers to the IUCN Red list Index. It would be better to clarify which RLI is. In Japan, there is also the Japanese Red List published by the Ministry of the Environment. |
| 18 | "Red List Indices for utilized species" | We would like to know what kind of "utilization" is assumed in this index; whether it means utilization by people as pets, or as food, medicine, or other purposes such as trade. |
| 20 | "Growth in number of species occurrence records accessible through the Global Biodiversity Information Facility" | We would like to suggest adding "other databases" at the end of this indicator, i.e. changing to "Growth in number of species occurrence records accessible through the Global Biodiversity Information Facility and other databases. |