

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

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Title of document reviewed:	UNEP/CBD/ID/AHTEG/2015/1/2: Global Indicators and sub-global approaches to monitor progress in the implementation of the strategic plan for biodiversity 2011-2020	
Comments on the draft documentation for SBSTTA-19		
Page	Paragraph	Comment
0	0	<p>General comments</p> <p>-It is important that this work link with the indicator development work being undertaken by IPBES and the UN SDGs.</p> <p>-Ideally, we should strive for harmonised indicators that respond to a number of MEAs in terms of their ability to be disaggregated and recombined as necessary.</p> <p>-Furthermore, consideration of an independent audit system (similar to that of the Ocean Health Index, which is run out of an independent technical think-tank) would also be valuable. In addition, the OECD Better life Initiative is an attempt to bring together internationally comparable measures of well-being in line with the recommendations of the Commission on the Measurement of Economic Performance and Social Progress.</p>
0	0	<p>General comment</p> <p>-There is a need to balance the ability of indicators to provide clear information and the necessary loss of clarity and narrative, which results from this. Often a single indicator is attempting to aggregate many divergent data sources - with significant nuance - into one status or trend.</p> <p>-Experience from New Zealand illustrates the risk of this, especially for historically data deficient areas: often we appear to have a negative trend when in fact we are quantifying the information for the first time.</p> <p>-It is important to acknowledge that indicators should not be read in isolation: e.g., if the FAO definition of forest degradation¹ was used literally, then any interaction with the forest, including stopping negative actions that exploit forest goods and services, can be classified as degradation.</p> <p>-The need for a more holistic consideration is partially addressed in para 6, however there is potential to increase the cover of this throughout the paper. This will be particularly relevant where nations or regions include diverse aspects in the definition of 'sustainable', for example the <i>mauri</i> of forest dependent species is a very specific concept to New Zealand.</p> <p>¹ 'The reduction of the capacity of a forest to provide goods and services'</p>

1	1	Last sentence re category C indicators. It should also be noted that the national or other subglobal level indicators were developed in order for them to be used when monitoring the performance of NBSAPs.
2	5	The paragraph states that, “Few countries, if any, have indicator based monitoring systems...” While a review of the NBSAPS might suggest this at a national scale, it is more than likely that many countries do have site- or species-specific monitoring systems in place. The trick would be to find a way of using this data to build a more comprehensive quantitative assessment of the status of biodiversity within each country in order to more effectively report on the Aichi Targets as required. New Zealand’s own biodiversity monitoring system is relatively comprehensive and has entailed a significant investment in time and money but still only provides a partial picture of that state of biodiversity in New Zealand. Better modelling tools that can take existing datasets and create a more representative picture would be invaluable, particularly in countries where funding is not available for the intensive monitoring requirements needed.
2	5	It should be noted that some Aichi Targets will be less tractable to the use of indicators than others. For example, there is a paradoxical quality that a number of mainstreaming targets (Goal A) will become harder to measure as they are achieved using the indicators proposed in the table in the Annex.
2	7	This paragraph refers to the selection being from 170 identified indicators. There is a need to harmonise indicators and metrics (i.e. to include GBO, GEOBON/BIP, and SDGs). Ideally, there should be a single set of globally agreed indicators that can be used at the national level.
3	8 (b) i	Another advantage of using expert opinion is that it allows the consideration and balancing of divergent directions within a single indicator. Would suggest adding to the end of the para: ...and biodiversity, and the relationships between different parts of the ecosystem (especially if trends are divergent).
3	8 (b) ii	It would be worth noting that experts can be authors, and experts can be enlisted to author specific sections. The IPCC is particularly good at this.
4	10	New Zealand agrees that one of the major issues with the Aichi Target “indicators” is the lack of standardisation from a global perspective. As noted above, a set of globally agreed national indicators is critical of a comprehensive picture of the status of biodiversity is to be achieved, though in this agreement all countries must be satisfied with the quality of the indicator, its appropriateness, and the methodological underpinnings.
4	11	While indicators may not be developed for biodiversity reporting, the use of other indicators can still provide a valuable assessment of the biodiversity and the CBD’s Article 1 objectives. An indicator that measures the potential for sustainable use of an ecosystem (e.g., a stock assessment of a harvested fish) can act a proxy for overall biodiversity health of that ecosystem.
4	12	The implications of this for a global indicator framework should be drawn out. Other international reporting retains the allowance of difference in methodology but still provides globally relevant information.
5	19	The first sentence states that “... parties use a variety of approaches to monitoring progress in implementation...” The raison d’être of indicators is that they offer the opportunity to harmonise and focus information and therefore add value to the subject being surveyed.
6	21	This paragraph, and the spread of biodiversity across the SDG indicators, highlights the importance of not narrowly defining what a biodiversity indicator is.
6	25	The separation of the Aichi Targets into their components argues for local specificity and flexibility, but also highlights the need to develop indicators at a level where the trends and data are meaningful.

7	27	The last sentence in this paragraph reiterates that though most Parties use indicators in their reports that these are difficult to compare... Again this reinforces the need for a set of consistent and agreed indicators.
7	28	We question the validity of the statement that it is possible to develop sound indicators based on Parties' self-assessment. It is our experience that self-assessment will often paint a much brighter picture than is actually occurring if only due to the fact that no single person will have sufficient overview of the intricacy of species/ecosystem services interactions, which show the true state of biodiversity. Further self-assessments are often anecdotal and while useful as some form of pointer, they should not be construed as being equivalent or comparative to a quantitative assessment based on transparent and repeatable scientific measurement.
8	29	We offer a note of caution – while we agree that the additional potential indicators developed under the auspices of GEO-BON etc might prove useful, we should be cautious about adding in any further indicators when it is clear from this analysis that we do not know how to support the effective and consistent use of the existing ones.
8	30	New Zealand is supportive of the EBV approach because it demands harmonisation and standardisation of methodologies. Further it validates use of the monitoring system that New Zealand already has in place.
8	32	We think the statement in the first sentence suggesting much progress has been made might be slightly overly enthusiastic. It is clear from reading this document that reporting efforts are highly variable and this means that the global picture is not as accurate as one would hope. Progress will only be made when we get more consistency in approach.
10	table	<p>We are concerned with the ubiquitous use of trends and headline indicators when in most cases nationally – globally there is not the developed methodologies and protocols to measure and monitor changes in trajectory, nor is there established baselines for comparison. Reporting will never deliver what is needed by way of a truly quantitative assessment without these issues being addressed.</p> <p>Further, we are concerned that there are three risks from dis/aggregation:</p> <ol style="list-style-type: none"> 1) The aggregation will mask an undesirable trend of critical subcomponents. 2) Will lose a sense of scale of the impact if a crude trend indicator is used (e.g. up arrow) 3) Independent of the direction of the trend, if the outcome of that trend is positive or negative will be highly subjective.

Please submit your comments to secretariat@cbd.int or by fax at +1 514 288 6588.