**Template for the Advanced Comments on Draft Documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation**

**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**

|  |  |
| --- | --- |
| **Advanced comments on the draft documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation** | |
| **Scope of this template for comments** | Guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework, contained in the document CBD/SBI/3/11/Add.4 which includes a draft version of Annex A to CBD/SBI/3/CRP.5. |
| ***Contact information*** | |
| **Surname:** | Bohnenblust |
| **Given Name:** | Vincent |
| **Government** (if applicable)**:** | Federal Department of the Environment, Transport, Energy and Communications DETEC |
| **Organization:** | Federal Office for the Environment FOEN |
| **Address:** |  |
| **City:** | Bern |
| **Country:** | Switzerland |
| **Postal Code:** | 3003 |
| **Phone Number** (including country code)**:** | +41 58 462 93 11 |
| E-mail: | vincent.bohnenblust@bafu.admin.ch |
| **Comments** | |
| Please provide any general comments on the national biodiversity strategy and action plan guidance.  Switzerland welcomes the fact that the concept of nationally determined commitments is not any more pursued, since this new document replaces document CBD/SBI/3/11/Add.3/Rev.1 on further information and a draft template for the submission of national commitments/contributions to the post-2020 global biodiversity framework. Indeed, Switzerland was not supporting the concept of national commitments/contributions as an additional layer in the post-2020 GBF, as they would create an additional burden without any added value but weakening the well-established and central tool of the NBSAPs.  Thus, NBSAPs remain the core planning instrument at national level for implementing the post  2020 GBF, Parties should have an obligation to review their NBSAPs and align them with the post-2020 Global Biodiversity Framework (GBF) after its adoption – to faciliate this update of the NBSAPs, common guidance should indeed be adopted, including that NBSAPs should address all agreed headline indicators.  Switzerland welcomes the introduction of a time frame of 12 months within which the review of the NBSAP should be completed (see par. 5) given the fact that we only have 8 years left to implement the GBF. We recognize that updates can be succinct and focus on new elements of the GBF the existing NBSAP did not yet address.  We also welcome the proposal for minimum common elements for the updated NBSAPs. This is crucial in order to be able to compare and understand the parties’ NBSAPs. Switzerland would even encourage to move towards more standardization. If parties wish to include additional elements taking into account specific national circumstances this should be done in a second part after the harmonized first part of the NBSAP.  Regarding the identification of resources necessary for implementation, which should i.a. happen through the development of a national biodiversity finance plan (par. 6b), we would suggest to mention the Biodiversity Finance Initiative (Biofin) of UNDP, which offers an excellent methodology for a comprehensive financial planning.  As for the Monitoring and Review Mechanism, we are of the opinion that the national indicators should only be possible in addition, but that the focus should remain on the agreed headline indicators. Therefore, the wording of par. 6c should be adapted.  We are also glad to see that the goal of developing synergies with other relevant MEAs is included into the draft. Indeed, national focal points of the biodiversity-related conventions and Rio conventions should contribute to the review process of the NBSAP (par. 9) and the planning and implementation mechanisms of other relevant MEAs should be integrated to maximize efficiency and coherence (par 11).  Par. 9 refers two times to subnational authorities. The second mention at the end of the paragraph should therefore be deleted (“representatives of key government ministries and authorities (including at the subnational and local levels)” is enough). | |
| Please use the table below to provide any specific comments on the template: | |

|  |  |
| --- | --- |
| **Section** | **Comment** |
| 1 | Please provide comments on section 1 which includes the elaboration of national targets towards each of the global targets of the post-2020 global biodiversity framework.  - |
| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.  - |
| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.  Switzerland doesn’t see the purpose or usefulness of refereeing to the Strategic Plan for Biodiversity 2011-2020. Parties should focus on the new GBF. That being said, we see the relevance of reporting the link to other processes, under which the commitment has possibly been made, such as the SDGs. The list in brackets of examples of those processes should include in the first place the SDGs. Or, alternatively, write: “If another process, please indicate which one”. |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments.  Not really clear what is meant with “only joint activities involving the national Government and others”. In this regard, Switzerland would like to point out that States cannot simply rely on voluntary contributions of some non-state actors. They still have to take their responsibilities as Parties of the Convention. It is ok if the national government adopted a policy bringing the non-state actors to contribute to the target. However, fully voluntary contributions shouldn’t be listed here but in the Sharm El-Sheik to Kunming Action Agenda for Nature and People! |
| *5 (suggestion)* | Another question in addition could ask whether the Party is planning to revise its NBSAP or not, and if yes, what is the provisional timeline until its adoption. |