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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**

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| **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.  |
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| **Comments** |
| Please provide any general comments on the national biodiversity strategy and action plan guidance. Importance of alignment with Global targets* Annex Para 1. New Zealand supports the provision of guidance on the updating or revision of National Biodiversity Strategy and Action Plans (NBSAPs) in light of the post-2020 global biodiversity framework, including a template for the communication of national targets or actions in a standardised format. In particular, we welcome this opportunity to supplement the previous guidance (including decision IX/8, para. 8) with additional clarity on how Parties’ national implementation actions can align with and contribute clearly and directly to the achievement of the Convention’s global priorities for halting and reversing the unprecedented loss of biodiversity.
* Annex Para 1. It will be important that this guidance encourages a strong, clear and meaningful alignment with the global targets, within each county's circumstances and opportunities. A lack of alignment was one of the key reasons identified for why none of the Aichi targets were fully achieved. It is important that each Party is encouraged to consider and communicate how they plan to contribute to each global target.

Providing for the option where a Party may choose to update their NBSAP or their AP only* Annex Para 5. NZ agrees that, on the adoption of the post-2020 global biodiversity framework, it will be critical that Parties review their NBSAPs in light of the new global framework. We note that the details of how Parties should update or revise their NBSAPs are still being negotiated, and therefore there may be some aspects to updating NBSAPs which are not yet addressed by this Annex. For example, it may be appropriate for a Party who has reviewed their NBS and found it already well-aligned with the post-2020 framework, to submit updates or revisions through an updated or revised Action Plan only, rather than through a full NBSAP update.

Timeframe* Annex Para 5. NZ supports a timeframe of 12 months after the adoption of the new framework for the submission of updated or revised NBSAPs, including national targets aligned with the post-2020 framework. This will be vital to introducing a more cyclical approach to national planning, reporting, review and global stocktaking under the CBD, which will help to build global momentum and visibility of implementation progress and challenges, and will be a key driver of increased ambition and action.
* Annex Para 5. NZ notes that paragraph 5 could be read as suggesting that parties' 'review' of their NBSAP is a discrete stage of its own, with its own timeframe. This could imply that a different timeframe would apply to the submission of updated and revised NBSAPs. While we are open to discussing this option, it may be simpler to set only one deadline for both processes. This could be addressed by adding the words, 'and the subsequent submission of any updated or revised NBSAP,' after the words 'This review'.

**Guidance** on NBSAP updating and review should **be kept focused and avoid detailed prescription*** Annex Para 5. Given the importance of Parties updating or revising their NBSAPs as soon as possible after the adoption of the framework, it will be important that any guidance on the review of NBSAPs is kept focused on what is needed to ensure alignment. It should avoid detailed prescriptions which could risk delaying the submission of updated or revised NBSAPs.
* NZ also considers that the focus of the review should be on whether there are implementation, ambition or monitoring gaps in a Party's NBSAP, relative to the global goals, targets or headline indicators.
* We suggest that the text is revised to: '**The review** should include any implementation, **ambition or monitoring** gaps i**n relation to the global** goals, targets **or headlin**e indicators. **This could include consideration of existing national targets or actions,** monitoring systems monitoring systems…'.

Identification of minimum common elements for updated/revised NBSAPs* Annex para 6. NZ supports the identification of minimum common elements for updated/revised NBSAPs, while ensuring they remain flexible instruments reflecting national priorities, opportunities and circumstances.
* Para 6(a). We support the proposal that parties develop 'national targets aligned with the post-2020 framework', and that this alignment should be explicit where possible, recognising that this is vital to encourage ambitious and transparent contributions to the implementation of the global framework. We also agree that Parties should address each one of the targets of the post-2020 global biodiversity framework, as well as consider any longer-term requirements needed to contribute to the global goals.
* However, we would welcome discussion on whether the term 'national targets' should potentially be broadened or defined in a way that also includes 'national commitments, policy initiatives or actions'. Alternatively, we could just refer to ‘National targets or commitments’. Many of the draft '2030 Action Targets' include multiple components across different sectors, some of which could be addressed by national targets, while others might be better addressed through specific policy commitments or initiatives. We would welcome discussion of what term (or terms) would encourage the most effective and meaningful alignment in ambition and implementation with each global target, within each country's national opportunities and circumstances.

Clarifying that national targets form a part of and are not separate to NBSAPs – which remain the primary vehicle for the implementation of the Convention* Annex Para 6(a). As noted above, we support the proposal that Parties submit national targets aligned with each of the global goals and targets, and communicate these in a standardised way, by a common date, as part of (and potentially advance of) their updated/revised NBSAPs.
* Setting targets however is not enough on its own to halt and reverse the loss of biodiversity. It will be vital that how they will be implemented is included in the ‘Action Plan’ component of future updated/revised NBSAPs. For this reason, we suggest that paragraph 6(a) is further clarified that these national targets should be integrated into future updated/ revised NBSAPs, but do not themselves constitute a separate instrument from NBSAPs - which remain the primary vehicle for the implementation of the Convention.

Responsiveness to the results of global stocktakes* Annex Para 6(a). NZ agrees that Parties should be ready to adapt or enhance their national targets (or other actions) as needed in the light of the results of the global stocktakes (both on ambition and on implementation.
* Annex Para 2. NZ supports the ability for NBSAPs to be 'living documents', allowing for ongoing enhancements to actions, ambition and implementation. This includes, as part of a cyclical model of periodic planning, reporting, review and global stocktaking, incorporating a stage where Parties are encouraged to review and update, if appropriate, the ambition and implementation of their NBSAP, in light of the outcomes of the global stocktake.

**Whether NBSAPs should include monitoring indicators – or describe the monitoring system*** Annex para 6(c). NBSAPs should include identification of the intended monitoring indicators, to assist with national planning, as well as with future monitoring and review. Requiring the identification of monitoring indicators is different though to requiring the description of the national monitoring system or mechanism by which the Party will track progress against implementation of the NBSAP or global framework. The guidance in this paragraph should therefore be clarified as to whether it is requiring Parties to include indicators in their NBSAP, or to identify the system or mechanism by which they intend to monitor and review their progress in implementation – or both. NZ suggests that the former, at least, should be a minimum requirement for post-2020 updated/revised NBSAPs, as an important planning and alignment function. Parties should specifically include the new global headline indicators, as well as component and complementary indicators where relevant, to encourage alignment and understanding of how national effort contributes to the global achievement of the post-2020 framework.

Proposal for a national coordination mechanism* Annex Para 9. NZ welcomes the suggestion of a national coordination mechanism. Our own national experience is that establishing cross-agency governance arrangements can help to support the implementation of the NBSAP as a whole-of-government policy framework.

**A standardised format should apply to the communication of national targets – not to the form or content of targets** * Annex Para 7. In line with the comments above, on the potential for national contributions to the global framework to take a variety of forms, NZ considers that national targets should not have to follow a prescriptive format, but they could however be *communicated* in a standardised format. The first sentence of this paragraph should therefore be revised to, 'National targets should be communicated in a standardized format…'.

Template for submission of national targets* NZ supports use of a template to encourage the communication of national targets or other contributions in a standardised format. The template should be kept as simple as possible to minimise the reporting burden or the risk of delays in its submission.
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| Please use the table below to provide any specific comments on the template:  |

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| **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.NZ agrees that the template should follow the order of the global targets, against which national targets or other commitments should be identified.As many of the global targets will include multiple components, we suggest including a dropdown, tick-box list of target components, for each global target. This would enable Parties to indicate which global target components are addressed by any given national target. (eg, for a pollution target, does it address pesticides, plastic, light, etc).An additional, optional drop-down menu could also be included for other MEA objectives. |
| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.NZ notes that the lead agency responsible for implementing a national target may not be the sole agency responsible for reporting on it. Therefore, row 2 could potentially be split into two rows - one for the implementation lead, and one for the reporting lead. |
| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.NZ suggests that this section could be streamlined by more simply asking, 'Does this national target also fulfil or contribute to any other government commitments, including under the SDGs?' It could then include a free text box, as well as a drop down menu of SDG goals. The purpose of this section should be to highlight the importance or wider relevance of the national target, not to assess whether it is additional to pre-existing commitments. |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. NZ suggests that this section could be made optional, as it could potentially capture many initiatives, not all of which the central government agency responsible for the NBSAP may be aware of. |