**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**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in CBD/SBI/3/11/ADD 6**

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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| **Scope of this template for comments**  | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in the document CBD/SBI/3/11/Add.6, which includes a draft of Annex B to CBD/SBI/3/CRP.5. This template aims to collect feedback on that Annex.  |
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| **Comments** |
| Please include general comments on capturing commitments from actors other than national governments.* New Zealand welcomes the proposed reporting template for the sharing of additional biodiversity commitments or other relevant actions by non-state actors which will contribute to the post-2020 global biodiversity framework, for inclusion in an online platform such as the Sharm El-Sheikh to Kunming Action Agenda for Nature and People.
* Non-state actors will make a critical contribution to the achievement of the post-2020 global biodiversity framework. This template is an opportunity to enhance the public reporting of such commitments and actions in order to encourage their visibility, effectiveness, ambition and alignment with the post-2020 global biodiversity.
* We prefer the term ‘non-state actors’ to ‘actors other than national governments’, as a simpler term which is more widely understood.
* We recognize that only contracting Parties have formal commitments under the CBD, so any reporting requirements for non-state actors should be flexible, voluntary, and have the primary objective of encouraging the maximum contribution from non-state actors towards the achievement of the post-2020 global biodiversity framework – and for this contribution to grow in momentum over time. The reporting template should therefore be as simple possible, and focus on the key information requirements that will best support the visibility, effectiveness and ambition of NSA commitments.
* Currently the introductory notes to the Annex stress that the purpose of the minimum reporting requirements is to enable later analysis and global aggregation, to promote ambition and implementation through transparency and accountability. We support the contributions of NSAs being an important element to inform the global stocktake, but we are not convinced that non-state actors’ contributions can be easily aggregated. Even if they could be, this is unlikely to be the main incentive for non-state actors to make ambitious contributions to the post-2020 framework – which should be the focus of the template’s design.
* Rather than being overly focused on ensuring aggregability and additionality (or the risk of double counting), we suggest that we take a more positive, encouraging and behavioral science-based approach to the reporting requirements, so that reporting biodiversity commitments brings greater visibility to the outcomes and benefits of making such biodiversity commitments, both for the non-state actor as well as for the post-2020 framework. In this way it becomes a further driver and incentive for increased commitments over time.
* For this reason, we believe the template’s minimum reporting requirements should seek to encourage non-state actors to ensure that their commitments result in genuine, verifiable outcomes, relevant to the to the post-2020 framework, and that these outcomes are publicly reported, as a further in-built incentive to ensure that commitments deliver as intended against their stated objectives. Non-state actors should be recognized for their genuine and vital contributions to the post-2020 framework.
* To this end, non-state actors should be specifically encouraged to report how their commitments impact on at least one of the direct drivers, indirect drivers, or underlying enabling factors of biodiversity losses or gains. (A footnote could refer them to the IPBES Global Assessment findings findings for further explanation of these factors in achieving transformational change.)
* We have made some specific suggestions below for how this might be achieved, but we look forward to further discussion of this at our next face-face meeting.
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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 on general information on the actor.* We suggest a new bullet point, ‘Leadership: Whether the commitment is pledged at head of organization level’ (drop-down menu: yes/no).
* On Geographic scope, we suggest a drop-down menu enabling section of the country or countries in which the commitment will take place.
* Under Type of organization, we suggest to: 1) add ‘business organization’ after corporation; 2) include a drop-down menu for identifying the relevant sector(s), which should include primary sectors such as agriculture and sustainable forest management; and 3) change ‘national or regional initiative’ to ‘nation-wide or regional initiative’, to avoid confusion with government initiatives.
* As others have commented, we also query whether commitments by United Nations systems entities, such as other MEAs, should be captured by this template. If they are to be included, any such commitments should be independent actions of such entities, rather than agreed joint actions by their contracting Parties, to avoid overlap with national government commitments.
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| 2 | Please provide comments on section 2 which includes the section on specific commitments from actors other than national governments.* Underneath Title, we suggest a new bullet point, ‘Objectives’, where the non-state actor could describe briefly the intended objective(s) of the commitments.
* On paragraph 9, we suggest providing a drop-down menu where the proponent could identify the relevant post-2020 framework goal(s) and/or target(s) for their commitment.
* Noting that many of the global targets are likely to contain several distinct components, there may also be value in providing a further, optional drop-down menu which allows selection of either relevant target component (eg, ‘Target 7 – plastic pollution’) or a relevant indicator from the list of headline, component or complimentary indicators.
* On paragraph 10, we suggested revising the Description guidance for (b) to: ‘(b) which direct drivers, indirect drivers or enabling conditions for biodiversity loss will the commitment seek to address; and (c), its intended impacts or results contributing to the achievement of the goals and targets of the post-2020 GBF…’. This would introduce an educational component to the template, promoting behavioral change and helping to support more effective and transformational commitments.
* On paragraph 11, we suggest ‘Expected impact’ is revised to ‘Expected impacts or outcomes’, as outcomes are generally higher order. Expected impacts or results could also be covered under the Description.
* Paragraph 12. We support a drop-down list of theme areas, but suggest it is broadened to include additional themes; and supplemented by an additional, optional drop-down list allowing selection of specific direct drivers of biodiversity loss eg, (deforestation), indirect drivers (eg, unsustainable production), and enabling conditions (eg, people’s connection to nature), as well as a free-text option. As above, this would introduce a further educational and behavioral-change component to the template, helping to support better targeted and more effective and transformational commitments.
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| 3 | Please provide comments on section 3 on progress tracking.* Under paragraph 18, we suggest adding a new item: ‘Optional – Lessons learned: Any best-practice learnings, unexpected positive impacts, co-benefits, experiences or lessons learned’.
* Under paragraph 17, we suggest adding a new item, ‘Outcome assurance: Identify at least one outcome, corresponding to the intended objective(s), which will be verifiable, and reported publicly at the end of the commitment timeframe’. This item could be optional. We suggest also adding a tick box, ‘Will the verifiable outcome(s) be subject to subject to external independent review? [Y/N]’.
* We suggest adding a new item, ‘Outcomes Report’, requesting the web address of the final report on the Commitment’s outcomes.
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