**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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. We welcome this guidance on updating NBSAPs in light of the Post-2020 GBF. As a general comment, the language of the document could be further strengthened as it is extremely important that countries review their NBSAPs to incorporate the new goals and targets.Parties must facilitate the engagement of business in the updating of NBSAPs and translate national targets into explicit sectoral plans to set expectations regarding business contributions. A guidance on updating NBSAPs designed for Parties only, without clear mechanisms that would enable business and finance to meaningfully act and report their contributions would be a major missed opportunity as national reporting would become more achievable and less onerous for Parties with active non-state actors contribution, including business contribution. |
| 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.There should be a clear deadline for establishing national targets, similar to the timeline for revision of the NBSAP. This will be critical for a successful implementation. It is important to consider realistic timing. Assuming COP15 will take place in the Summer of 2022, Parties can revise their NBSAPs until Summer 2023. If national targets or concrete actions are to be determined afterwards, even with a deadline of 1 year, then it will already be the end of 2024. Leaving roughly 5 years until 2030.A clear guideline and deadline will be necessary even if Parties decide not to aim for 2030 as a time horizon anymore, due to COP delays. |
| 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. |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. Para 5, line 3 “This review should be completed within 12 months of the adoption of the new framework and should include implementation gaps, existing goals, targets and indicators, monitoring systems (including existing data, **data gaps,** knowledge and knowledge systems), sectoral and cross-sectoral policies, finance and other means of implementation, and ~~an assessment of the~~ **ensure** stakeholders and rightsholders **are** involved in revision and implementation.”Justification: *This section could be clearer as the aspect of participation may be confusing. Currently, it only says that it should be assessed (=described) if stakeholders have been involved in the implementation and revision. It is however important that it specifically request Parties to involve stakeholders in the revision process.*Para 6 (b) “The resources necessary for implementation should be identified through the development of a national biodiversity finance plan, and the actors, **including non-state actors,** responsible for implementation should be identified and agreed at the time of planning and writing so that their buy-in and participation is guaranteed.”Para 9 line 10 “…and other stakeholders, to oversee the revision **and actively participate in the implementation,** monitoring and review of the NBSAP and other biodiversity-relevant instruments.Justification: *Non-state actors should be encouraged to actively participate in the implementation of NBSAPs and should take part in developing or updating national targets. The inclusion of non-state actors in the planning, reporting and review processes is beneficial for governments to ensure an effective and inclusive plan of action in which everyone can contribute for the achievement of its goals.*The last column (*Notes*) of this last section of the template for submission of national targets towards the GBF: “This entry would be only for joint activities involving the national Government and others. This box would be used to **avoid** ~~reduce~~ double counting.”Justification: *We support this section for the inclusion of non-state actors in the process. However, strict measures should be put in place to establish a system to not only reduce, but completely avoid double counting of activities made by all governments authorities and non-state actors, including business. Effective communication and collaboration throughout the process is essential to avoid double counting.* |