**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**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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| **Scope of this template for comments**  | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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.1. **General comments on capturing commitments from actors other than national governments**

Business for Nature welcomes the publication of document CBD/SBI/3/11/Add.6 on Commitments from actors other than national governments in the context of an enhanced planning, monitoring, review and reporting mechanism. We support the Parties and CBD Secretariat’s ambition to invite indigenous peoples and local communities, subnational governments, cities and other local authorities, intergovernmental organizations, other multilateral environmental agreements, non-governmental organizations, women’s groups, youth groups, research organizations, the business and finance community and representatives of sectors related to or dependent on biodiversity, to develop commitments in support of the post-2020 global biodiversity framework. We especially welcome the recognition of the role non-parties have to play in the transformation needed and the way this is framed in the proposed general principles for including commitments from actors other than national governments in an enhanced planning, monitoring, review and reporting mechanism. This is an important contribution to mainstreaming biodiversity into the decision-making and actions of all relevant actors, which is key to achieving the mission and targets from the Post-2020 Global Biodiversity Framework. Notwithstanding the many good elements in document CBD/SBI/3/11/Add.6, we believe that the following key reflections could help to strengthen, improve and refine the document:1. **Acknowledge and include commitments from existing commitment platforms that contribute to reversing nature loss:** Hundreds of forward-thinking businesses have already made commitments and are taking action to help reverse nature loss through existing commitment platforms, focusing on specific SDGs, sectors or cross-cutting issues. Non-state contributions to achieving the Post-2020 Global Biodiversity Framework targets will accelerate if these commitments are acknowledged. (See [www.businessfornature.org/](http://www.businessfornature.org/commit)commit for an overview of existing business commitments to reverse nature loss.)
2. **Promote alignment between commitments from Parties and non-parties, by setting a global mission for nature that will drive all stakeholders’ actions and by structuring commitments to their contribution to SDGs:** A clear, simple, measurable and rallying mission that sets the direction of travel for all stakeholders would allow Parties to add up commitments of all actors in their country, comparable to how Parties at UNFCC can calculate a total contribution to reduce CO2 emissions. In order to promote mainstreaming of biodiversity commitments with other commitments, this should be combined with structuring the commitments on the basis of their contribution to SDGs. Existing global business commitments exists for example related to SDG 14, SDG 15 and SDG 6.
3. **Parties should strengthen minimum criteria for commitments and initiatives from non-parties that align with best practice and ambition of the Global Biodiversity Framework.** In order to ensure that commitments and initiatives contribute substantially to the action agenda, we propose to add the following considerations to the [current set of criteria](https://www.cbd.int/action-agenda/criteria.shtml):
	* **Leadership**: commitment should be pledged at the head of organization level
	* **Timeframe:** there needs to be a clear timeframe for the commitment
	* **Transparency:** there needs to be a public list of committed companies and the platform needs to be open to more companies participating.
	* **Accountability**: commit to report publicly both progress against interim and long-term targets, as well as the actions being taken, at least annually.
4. **Parties should coordinate reporting of progress, using aligned metrics for assessing progress, and promote cross-sectoral collaboration on implementation of commitments**: To assess progress, all actors should use metrics that are aligned and consistent with the Post-2020 GBF’s Monitoring Framework. Parties should coordinate reporting by all actors under their jurisdiction, to ensure consistency at national level, and a protocol needs to be in place to guide attribution of cross-boundary to the relevant parties.
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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.**6 Current text:** Geographical scope (local, national, regional or multinational). **Suggested amendment:** 6. Geographic scope (local, national, regional or multinational).6 bis. For supra-national organizations: Identification and attribution of activities to relevant geographies.***Justification:*** *Many businesses that have committed to help reversing nature loss are multinational companies with activities that are not limited to on geographical area.***7. Current text:** Type of organization (academic and research institute; financial institution; company/corporation (specify the sector); indigenous peoples and local communities; national or regional initiative; non-governmental organization; private foundation; subnational or local government; regional organization; intergovernmental organization/initiative; United Nations system entity; youth organization; other (please specify)).**Suggested amendment:** 7. Type of organization (academic and research institute; financial institution; company/corporation/**business organization** (specify the sector); indigenous peoples and local communities; national or regional initiative; non-governmental organization; private foundation; subnational or local government; regional organization; intergovernmental organization/initiative; United Nations system entity; youth organization; business or multi-stakeholder initiative; other (please specify)).***Justification:*** *Extending the list to include “business or multi-stakeholder initiatives” would allow groups of company commitments to be included in bulk. As with the others in the list, it will be necessary to avoid double-counting efforts that are featured in multiple sites, but this will position the CBD Action Agenda as a central repository that will benefit us all.* |
| 2 | Please provide comments on section 2 which includes the section on specific commitments from actors other than national governments.**8. Current text:** Title (the title or name of the commitment/action).**Suggested amendment:** 8. Identification: 1. Title (the title or name of the commitment/action).
2. Is the commitment pledged at the head of organization level?
3. Is the commitment open to more organizations participating?

***Justification:*** *In order to ensure that the commitments are signed at the just organizational level, it is needed to clarify at what level of leadership the commitment is pledged. Also, information should be available on the commitment being open for others to join.***9. Current text:** 9 (a) Primary target (single selection of the most relevant target);**Suggested amendment:** 9 (a) Primary focus of the commitment in terms of Post-2020 GFB mission, goal or target (single selection of the most relevant focus ~~target~~);***Justification:*** *Focusing on a single target is not possible for many existing commitments and is promoting a fragmented approach rather than a more holistic and strategic approach. This can be changed by including a primary focus on the mission or one of the goals or targets. Adding the option of committing towards the GBF mission overall (i.e. a global goal for nature “Nature positive by 2030”) could accelerate the number of commitments, as such an engaging global goal could potentially mobilize many more non-state parties to commit.***13. Current text:** 13. Sustainable Development Goal(s) to which the commitment contributes (optional).**Suggested amendment:** 13. Sustainable Development Goal(s) to which the commitment contributes ~~(optional)~~.13 bis. Region to which the commitment contributes.13 ter. Sector that the commitment is focusing on.***Justification:*** *In order to promote alignment and consistency, and to allow aggregation of commitments, it is needed that all commitments are linked to SDGs, regions and sectors, as appropriate.* |
| 3 | Please provide comments on section 3 on progress tracking.**15. Current text:** 15. Timeline (start and end dates for the commitment): 1. Is this a one-time or recurrent commitment? If recurrent, indicate the duration.

**Suggested amendment:** 15. Timeline (start and end dates for the commitment): 1. Is there a clear timeframe for the commitment?
2. Is this a one-time or recurrent commitment? If recurrent, indicate the duration.

***Justification:*** *To ensure full transparency on the timeframe of the commitment, it is important to gain clarity on the duration of the commitment.* **15. Current text:** 17. Monitoring and reporting (indicate if monitoring arrangements are in place and the format, frequency and public availability of reporting).**Suggested amendment:** 17. Monitoring and reporting. Indicate: 1. If monitoring arrangements are in place.

The format, frequency and public availability of reporting publicly on both progress against interim and long-term targets, as well as the actions being taken, at least annually.***Justification:*** *In order to ensure appropriate disclosure, it is needed to make reporting publicly available, and also to ensure that reporting is both on progress as well as on actions taken.* |