**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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.  General comments:   * The revision of the NBSAP should be considered expedient: It remains the main planning document at Party level. National implementation without planning may never be that effective. NBSAPs are to Parties what the Post 2020 GBF is to the Convention. * Parties should be encouraged to ensure that the process is inclusive: all relevant government sectors and stakeholders should be involved, preferably using a bottom – top approach. High level political support and inter-ministerial coordination should be galvanised first and foremost by local level impetus. * National targets not taken into consideration in the GBF (if any) should constitute additional targets in the revised NBSAPs. * The innovative option of national commitments provides opportunities to greatly increase transparency and the ambition required of the parties to implement the new GBF. * The mandatory submissions and the publication of national contributions will promote greater transparency on the planned actions by each party, and significantly shape partner decisions to support each country. This proposal has largely drawn from the highly successful experience under the UNFCCC on the mandatory submissions of NDCs. * A National Commitment in itself is a voluntary engagement. Demonstrated at a high political level has a highly persuasive influence than obligatory processes requiring compliance with compelling measures that present enforcement challenges. International relations within intergovernmental processes are gradually drifting from compliance measures to party voluntary mechanisms. * A predominant challenge is the lack of clarity on the relationship between NCs and NBSAPs. The weight attached here to the mandatory submission of NCs as a planning mechanism is likely to weaken the importance of NBSAPs, the submission of which is not a requirement under Art 6 of the Convention. * It is an assumption that each party can secure a high level political endorsement of NCs. Varied levels in political endorsements will present a serious challenge in the effective application of other mechanisms in the ratchet cycle. * Enormous burden and risks of duplication or conflicts in data and reporting. The use of all indicators of the GBF goals and targets in determining the National commitments in parallel with developing NBSAPs that are aligned to the GBF goals and targets, as separate planning mechanisms imposes an enormous burden while presenting great risks of duplications and even conflicts in data and reporting. * Using the option of headline indicators will streamline the focus of the parties and facilitate the ultimate aggregation of efforts. This will greatly reduce the burden and costs associated with data collection, reporting and reviews. * Stepping up ambition within the 10-year term of the new GBF imposes a rhythm of performance that must be effective in the cycle of connected mechanisms and processes in the various steps during 5 years and running up to the recommendations of the COP. This requires adequate accompanying measures for African countries * The timeframe within which to step up NC constitutes an important challenge given the experience of delays in submitting National Reports to the CBD * The use of complimentary and component indicators within NBSAPs as provided by the GBF will facilitate aggregation and a better understanding during country to country peer review however it will certainly over burden parties and obligate the complete revision of current NBSAPs. | |
| 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.   * A template for National Commitments and a Guidance for its submission will greatly facilitate aggregation to determine collective efforts towards the goals and targets of the GBF. This will further facilitate the assessment and review processes of collective progress towards the implementation. * Revision of the NBSAPs be done by all Parties ensuring **chronological** alignment (**target by target**) with the adopted Post 2020 GBF.   This will help to:   * Harmonise reporting patterns * Identify commitment gaps between the national, regional and global targets * Identify national priorities not taken into consideration at the global level   (if any)   * Simplify aggregation at the regional and global levels   This is the sure way to ensure alignment of NBSAPs with the GBF. |
| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.   * Commitments should be grouped into thematic areas and Goal Leads appointed/designated by NFPs to spearhead coordination of implementation and reporting. * Ensure a whole of society approach, incorporating non-state actors and NGOs and CSOs in the process and ensuring synergies with other related Conventions. |
| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.   * The lack of clarity in the interlinkages or connectivity of the various mechanisms presents a challenge in the use of a template for NC. The use of a template will require a previous consensus on the content of a NC and the agreed set of GBF indicators to be used throughout the planning, reporting and review cycle |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. |