**Comments of the Government of Costa Rica regarding the following documents of the SBI 3/11:**

* **CBD/SBI/3/11/Add.6.** Commitments from actors other than national governments in the context of an enhanced planning, monitoring, review and reporting mechanism.
* **CBD/SBI/3/11/Add.5.** Modus operandi of the Open-ended Forum of the Subsidiary Body on Implementation for country-by-country review of implementation.
* **CBD/SBI/3/11/Add.4.** Draft guidance for updating or revising national biodiversity strategies and action plans in the light of the post-2020 global biodiversity framework.
* **CBD/SBI/3/11/Add.1/Amend.1 .** National reporting under the convention: revised guidance and draft template for the seventh and eighth national reports.

**COMMENTS**

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| CBD/SBI/3/11/Add.6 COMMITMENTS FROM ACTORS OTHER THAN NATIONAL GOVERNMENTS IN THE CONTEXT OF AN ENHANCED PLANNING, MONITORING, REVIEW AND REPORTING MECHANISM | | | | |
| ***General comments*** | | | | |
| The targets of the non-state actor must be linked to the target of the NBSAPs and the GBF, it is important to reflect this clarification in the Annex. | | | | |
| ***Specific comments*** | | | | |
| **Page** | **Paragraph** | **Comment** | |
| 3 | 9e | * **Original paragraph:**   “*Enhancing collaboration with related multilateral environmental agreements and intergovernmental sustainability processes working with actors other than national Governments and multi- stakeholder initiatives, inter alia, to benefit from cross-thematic stocktakes and dialogues and to identify and promote sector specific reporting; among other pilot project activities associated with non-State actors (such as TNFD, Science-based Targets Network (SBTN)”*   * **Comment**:   It would be important to explain how will be *sector specific reporting* and what other pilot project activities it should include other than TNFD and SBTN | |
| Page 1 annex | 7 | * **Original paragraph:**   “*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)).”*   * **Comment**   To be consistent with the rest of the documents. The paragraph should read as follows:  “*Type of organization (academic and research institute; financial institution;* ***private sector****; indigenous peoples and local communities; national or regional initiative; non- governmental organization;* ***philanthropic organizations****; subnational or local government; regional organization; intergovernmental organization/initiative; United Nations system entity; youth organization; other (please specify).”* | |
| Page 2 annex | 11 | * **Original paragraph:**   Commitment: Expected impact.   * **Comment**   It would be important to explain what will be the expected impact (more detailed). For example, in a process about biodiversity, or strengthening the community chains. It is required to define the impact for the progress tracking (last segment of the annex). | |
| Page 2 annex | 12 | * **Original paragraph:**   *Theme(s) (ideally aligned with the action themes: food systems and health; freshwater, coastal and ocean ecosystems; conservation and restoration of land ecosystems; climate change mitigation and adaptation; conservation and sustainable use of species; sustainable consumption and production; stewardship/good governance; urban sustainability; green finance; biosafety; and access to benefit-sharing).*   * **Comment**   The theme should be the commitment number 1 (8) and not the number 12, because the definition of the theme is the key element to develop the rest of the numerals. | |
| CBD/SBI/3/11/Add.5 MODUS OPERANDI OF THE OPEN-ENDED FORUM OF THE SUBSIDIARY BODY ON IMPLEMENTATION FOR COUNTRY-BY-COUNTRY REVIEW OF IMPLEMENTATION | | | |
| ***Specific comments*** | | | |
| **Page** | **Paragraph** | **Comment** | |
| 3 | 3 | * **Original paragraph:**   *The first phase would consist of a series of online dialogues2 in which a number of Parties3 would each present on various aspects of the implementation of their national biodiversity strategies and action*   * **Comment**   The paragraph does not indicate how many countries, from what regions or how it will be the designation of those countries. It is important to have more clarity in that respect. Finally we recommend to add “*action plans”* at the very end of the paragraph. | |
| CBD/SBI/3/11/Add.4 DRAFT GUIDANCE FOR UPDATING OR REVISING NATIONAL BIODIVERSITY STRATEGIES AND ACTION PLANS IN THE LIGHT OF THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK | | | |
| ***General comments*** | | | |
| Costa Rica suggests standardizing terms such as: national targets, national ambition/targets, among others. In the rest of the documents in negotiation the correct term used is “national targets”. to standardize the terms is relevant to avoid confusion among parties.  The same situation happens with respect to the term “non-state actors”, since at times the same concept is included as "whole-society approach" or “stakeholders across society”, when the term used in the rest of the documents is “non-state actors”. | | | |
| ***Specific comments*** | | | |
| **Page** | **Paragraph** | **Comment** | |
| 2 | 5 | * **Original paragraph:**   *“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, knowledge and knowledge systems), sectoral and cross-sectoral policies, finance and other means of implementation”*   * **Comment**   The suggestion is to read it as follows: “This review should be completed within 12 months of the adoption of the new framework and should include, [according to the national circumstances, elements such as] implementation gaps, existing goals, targets and indicators, monitoring systems (including existing data, knowledge and knowledge systems), sectoral and cross-sectoral policies, finance and other means of implementation”  The above because in paragraph 6a there is a call to align the national targets with the GBF in a one-year period, but section 5 talks not only about national targets, but also about implementation gaps, cross-sectoral policies, monitoring systems, etc. and it could create complications for several parties. | |
| 3 | 7 | * **Original paragraph:**   “*However, Parties that decide to update or revise their NBSAP within one year of adoption of the new framework could submit an updated or revised NBSAP and the national targets simultaneously.”*   * **Comment**   The phrase should be deleted because it creates confusion, since the NBSAPs include national targets per se. It is better to end the paragraph before this sentence and delete it altogether. | |
| CBD/SBI/3/11/Add.1/Amend.1 NATIONAL REPORTING UNDER THE CONVENTION: REVISED GUIDANCE AND DRAFT TEMPLATE FOR THE SEVENTH AND EIGHTH NATIONAL REPORTS | | | |
| ***General comments*** | | | |
| Regarding the “*Template section III. Has your country updated or revised its NBSAP or biodiversity action plan in the light of the post-2020 global biodiversity framework?”* It includes the requirement to be aligned with the NBSAP`s with national targets and national goals, however, the rest of the documents focus on the linkage between the NBSAP`s and the national targets.  In that sense, it is required in order to the proper fulfillment of this report, to have inputs on how to report in accordance with the goals. Indeed, in the document sbi-03-11-add4, “guide to review and update the NBSAPs”, the process of aligning the National Goals with the Objectives is not mentioned in detail, nor is it included in the template. | | | |
| **Specific comments** | | | |
| **Page** | **Paragraph** | **Comment** | |
| 2 | 6 | * **Original paragraph:**   *“The actions taken by non-state actors will also contribute to implementation of national and global targets and, therefore, should be reflected in the national report where relevant and appropriate, including the voluntary commitments made in the context of the Sharm El-Sheikh to Kunming Action Agenda for Nature and People”*   * **Comment**   To support the scope of this paragraph, it is essential that the non-state actors document establishes the metric or guidelines with which they will report and it is necessary that it be consistent with the metric used by the States for greater ease of reporting and analysis. In order for States to be able to contribute the commitments of non-state actors, it is necessary to use the same parameters. | |
| 3 | 11 | * **Original paragraph:**   “*National report templates could be pre-populated with available national data and disaggregated from global data sets or national data that is publicly available”*   * **Comment**   In many cases, it is better that the information is suggested in additional tools and not in the template itself where the State will formulate its response. | |
| 2 template | Section III | * **Original paragraph:**   “Has submitted national ambition or targets…”   * **Comment**   Delete the word ambition, because the proper concept is “national targets”. The national targets are expected to be ambitious per se. | |
| 2 template | Section V | * **Original paragraph:**   *“Please use the following template to report on progress in the implementation of national ambitions/targets and the extent to which the implementation of these national targets has contributed or is contributing to the achievement of each [target] action target”*   * **Comment:**   The suggestion is to read the paragraph as follows:  “Please use the following template to report on progress in the implementation of national ~~ambitions/~~targets and the extent to which the implementation of these national targets has contributed or is contributing to the achievement of each ~~[target] action~~ [Global] target”  **Please briefly describe main actions your**  **country has taken or is taking to implement this national ambition/target (suggested word count: (100-300 words):**  We recommend to delete the word ambition. | |
| 2 template | Section V | * **Original paragraph:**   *“Please briefly describe main actions your country has taken or is taking to implement this national ambition/target (suggested word count: (100-300 words):”*   * **Comment:**   To read it as follows:  country has taken or is taking to implement this national ~~ambition/~~target (suggested word count: (100-300 words). | |
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