**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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** | |
| IUCN welcomes the guidance for updating or revising the NBSAPs in the light of the post-2020 global biodiversity framework.  Under the minimum common elements, IUCN notes that overall there could be greater alignment between updating the NBSAPs and national reporting. For instance, if national targets may leverage commitments under other multilateral environmental agreements, the same could be said for indicators. Further, the importance of a national biodiversity finance plan is highlighted to identify the resources necessary for implementation but it seems to be a financial needs assessment and fails to specify whether it should include a national resource mobilization strategy and whether the monitoring of the plan should be part of the national reports or maintain a separate financial reporting.  IUCN suggests integrating gender considerations in the concrete action plans and the monitoring framework for a stronger alignment with the upcoming post-2020 Gender Plan of Action.  IUCN appreciates the “whole-of-government and whole-of-society approach for the revision, implementation and review of their NBSAPs”. IUCN highlights existing tools and analyses[[1]](#footnote-1) to guide ambitious and inclusive NBSAP updating processes, toward meeting interlinked global goals. Guidance on NDCs, for example, may be applicable.[[2]](#footnote-2) Guidance for parties and stakeholders may also include indications of enabling conditions that aid in review and revision - as well as implementation – processes. For example, parties to the CBD may consider appointing national gender and biodiversity focal points, as parties to the UNFCCC have been invited to appoint and sustain capacity of national gender and climate change focal points.  Finally, while the intent of the template is to submit national targets that contribute to each of the targets of the post-2020 global biodiversity framework, there could be a space for national targets that contribute to other elements of the framework, like enabling conditions, implementation support mechanisms and outreach awareness and uptake. Similarly contributions from such national targets could be captured in the templates for the 7th and 8th national reports. | |
| Please use the table below to provide any specific comments on the template: | |

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| **Section** | **Comment** |
| 1 |  |
| 2 |  |
| 3 | This section should include examples that also link to gender equality frameworks, such as CEDAW. |
| 4 | IUCN emphasizes that cross-sector coordination must include participation and representation of diverse women's and gender-focused groups, cooperatives, ministries, etc. IUCN recommends making explicit note of these examples in this section. |

1. See for example: [Gender and biodiversity: Analysis of women and gender equality considerations in National Biodiversity Strategies and Action Plans (NBSAPs)](https://genderandenvironment.org/report-gender-and-biodiversity-analysis-of-women-and-gender-equality-considerations-in-national-biodiversity-strategies-and-action-plans-nbsaps/) [↑](#footnote-ref-1)
2. See for example: <https://ndcpartnership.org/sites/default/files/Gender_Responsive_NDC_Action_Plans_Practical_Guide-March-2021.pdf> [↑](#footnote-ref-2)