

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TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4

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	
<p>Please provide any general comments on the national biodiversity strategy and action plan guidance.</p> <p>The following comments have been prepared by a number of civil society organizations working on accountability and the implementation mechanism in the context of the Global Biodiversity Framework. This submission is supported by RSPB, ClientEarth, Friends of the Earth Europe, BirdLife International, WWF</p> <p>This document should present NBSAPs, not national targets, as the main vehicle for communicating national ambition within a year of the adoption of the GBF. It is our understanding that national targets are a reflection of Parties' ambition and not intended action, as the latter is reflected in the NBSAPs, as prescribed in the CBD text itself. Meeting the 2030 Action Targets is not only a matter of ambition, but predominantly a matter of implementation (action). Parties should be encouraged to "adapt or enhance" the NBSAPs to reflect the GBF outcomes at the national level and pursuant to the outcomes of the global stocktakes. In general, we feel the Guidance contained in the Annex is not suitable for either ensuring that future NBSAPs are streamlined and comparable, or for identifying national actions relevant to the</p>	

delivery of the 2030 Action Targets. We believe that an additional Template should be added in this guidance, in order to give the NBSAPs a common structure and ensure comparability.

It is vital that the guidance for NBSAPs, national reports, and the monitoring framework are all adopted at COP15 as complementary tools, which together present a joined up package for parties to enhance implementation.

Guidance (Para 1 to 5 Annex)

- We welcome references to NBSAPs as whole-of-government, whole-of-society policy instruments (para. 2, 3 and 9). It is crucial these plans are mainstreamed across governments to ensure their full and effective implementation.
- We agree that stakeholders across society should be involved in planning and review to ensure the plans are met and mainstreamed (para 2).
- In paragraph 2 of the Annex, objectives, actions, sectors and stakeholders that pose potential risks (or have proven detrimental effects) on biodiversity should also be referenced and included in the NBSAPs. Biodiversity risks and drivers of biodiversity loss should be listed among the minimum common elements of the NBSAP (para 6) and include an overview of relevant national policies, objectives, actions, sectors and stakeholders, as well as relevant actions contained in the NBSAPs meant to counter or mitigate them.
- We welcome the emphasis on NBSAPs as ‘living documents’.
- We welcome the need to communicate national commitments using the template in the annex, through the clearing-house mechanism. We propose to add that they should also be made public under the CHM.
- Since the preliminary NBSAP review introduced in Paragraph 5 is an exercise in alignment and does not give rise to an actual update/revision of the NBSAP with the GBF, we believe that this review should be completed within 6 months after the adoption of the new framework, rather than 12 months as is currently proposed in paragraphs 5 and 7.

Minimum common elements of post-2020 updated/ revised NBSAP (Para 6 Annex)

- We welcome the overview of the minimum common elements for all the revised NBSAPs but, while we agree with minimum common elements as set out in para 6, it is absolutely essential that a standardized template for revised NBSAPs is also developed, discussed, and then adopted at COP15. We regret that this document does not present a template for revised NBSAPs, which is at least as critical as the template for national targets presented here. (para. 6).
- This document should clearly outline that national targets should be aligned with all the goals, milestones and targets of the Global Biodiversity Framework, rather than simply “contributing” to them (para. 6 a)

- Under (a) the “adoption or enhancement” should also extend to the NBSAPs themselves and Parties should be encouraged to “adapt or enhance” the NBSAPs pursuant to the outcomes of the global stocktakes.
- We are supportive of the need to develop national biodiversity finance plans as part of concrete action plans within NBSAP (para. 6b), but suggest they also detail the funding gaps in order to reach the targets fully. Guidance for national biodiversity finance plans should be developed and integrated in the standardized template for NBSAPs.
- We support the regular monitoring of NBSAP implementation; however, this should not only record progress towards national targets, but also *the gap* that still needs to be overcome to reach the target, or *distance to target*. (para 6c, lines 2-3)
- This document should explicitly state that this guidance should be adopted at COP15, including the template for revised NBSAPs.

Process and timeline for aligning NBSAP with the post-2020 global biodiversity Framework (para 7-12 annex)

- This document should present NBSAPs, not national targets, as the main vehicle for communicating national ambition within a year of the adoption of the GBF (para. 7). NBSAPs should be revised within a year of the adoption of the GBF. Only in the case where a revised NBSAP aligned with the GBF cannot be communicated within a year of the adoption of the framework, should national targets be communicated, before being fully integrated into the revised NBSAP as soon as possible.
- This document should explicitly state that this guidance should be adopted at COP15, including the template for revised NBSAPs.
- In para 9 the “national coordination mechanism” introduces a welcome addition, albeit in an overly generic manner. This paragraph should be expanded in order to include procedural requirements and safeguards, as well as the decision-making modalities of the national coordination mechanism, in order to empower non-Party actors’ and stakeholders’ involvement in the process
- On the integration of non-state actor commitments into NBSAPs this should be reflected as part of the process of consultation with stakeholders, but as an additional element - the development and implementation of NBSAPs is an obligation of parties and they should not rely on other actors’ commitments to achieve them.

Please use the table below to provide any specific comments on the template:

Section	Comment
1	Please provide comments on section 1 which includes the elaboration of national targets towards <u>each of the global targets</u> of the post-2020 global biodiversity framework.

	<p>National targets should be aligned with the global targets, rather than simply contributing to them. We therefore suggest to replace “how this target will contribute to the attainment of the global target(s)” by “how is this target commensurate and aligned with the global targets”.</p> <p>This template for national target/common elements of NBSAP should directly map onto how national reporting will be conducted.</p> <p>The intended actions associated with the national target that will be included or annexed in the updated/revised NBSAP should also be listed in this section, alongside a planned timeline of their implementation and associated funding sources.</p>
2	<p>Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.</p> <p>To ensure the development, submission and delivery of the target in line with the whole-of-government and whole-of society approaches, other authorities relevant to the “implementation and reporting” of the target should also be included here.</p>
3	<p>Please provide comments on section 3 on the linkages with other national initiatives and targets.</p> <p>For targets relevant to the Strategic Plan for Biodiversity 2011-2020, Parties should also provide the status of the target (whether it was met or not), providing a summary of the implementation challenges they faced during the 2011-2020 period and how they are planning to overcome them.</p>
4	<p>Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments.</p> <p>To avoid an overreliance on ambitious commitments, the sub-section “context in which it has been submitted” should be complemented by a sub-section on “planned joint actions associated with the target” which should include a tentative timeline for their implementation.</p>