

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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**

<b>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</b>	
<b>Scope of this template for comments</b>	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.
<b>Contact information</b>	
<b>Surname:</b>	Haraldstad
<b>Given Name:</b>	Marie
<b>Government (if applicable):</b>	Norway
<b>Organization:</b>	Ministry of Climate and Environment
<b>Address:</b>	Kongensgate 20
<b>City:</b>	Oslo
<b>Country:</b>	Norway
<b>Postal Code:</b>	0030
<b>Phone Number (including country code):</b>	004722246051
<b>E-mail:</b>	Marie.haraldstad@kld.dep.no
<b>Comments</b>	
Please provide any general comments on the national biodiversity strategy and action plan guidance.	
<p>We appreciate the opportunity to comment on the annexes through the peer review process, and underline that this annex, referring to the NBSAPs, needs to be adopted at COP15. It is therefore important that the annex be revised both in light of the current outcome of the SBI-discussion as well as comments provided through the peer review process and made available for consideration by parties. For instance the language of the annex should use terminology in line with the SBI-3 decision such as “update and revise” when referring to the NBSAP process following the adoption of the GBF ( para 3, 5 6a, 7, 12).</p> <p>The headline of the template is now indicating that the submission of targets could be a standalone exercise, without reference to NBSAPs. This question is still being negotiated. We suggest the following heading for the template: “<i>Template for common elements of post 2020 updated/revised NBSAPs</i>” this is the same text as in the heading in the annex before para 6.</p> <p>Comments on the Annex:</p> <ul style="list-style-type: none"> <li>- Para 2 and 3- suggest to delete “throughout the decade”. We believe the NBSAPs should be revised and updated to be aligned with the GBF, but the NBSAP is also an instrument to implement the Convention. We therefore prefer to not limit the scope to the decade.</li> </ul>	

- Para 4 – Suggest to simplify the language along the following lines: *“National implementation of the Convention should continue while Parties revise and update their NBSAPs to align them with the new global biodiversity framework”*
- Para 5 - We believe the current wording of this para is prejudging the negotiation, and that it is too prescriptive. We would prefer a short para reflecting that parties are expected to update their NBSAP, following the adoption of the post 2020 GBF, and that this should be done by COP16 (similar to para 4 from SBI/3 L.15 ). The para should also use the terms “update and revise” in line with the current wording we have in the SBI decision on item 9. Reference to “review” in this para is not appropriate, and should be deleted as it confuses the content with review of implementation.
- Para 6- Suggest to delete “Minimum” in the headline. We have already established that NBSAPs are flexible tools, this could also be made more explicit under para 3. The heading should therefore be focused on the common elements of the NBSAP. We suggest to keep the wording in para 6 simple, saying: “revised and updated NBSAPs following the adoption of the post 2020 GBF should contain the following set of common elements”
  - a) We believe the core content of this para is that national targets and actions of the NBSAP should be aligned with the global goals and targets of the GBF, and that parties are requested to make an explicit link between global targets and national actions and targets when they revise and update their NBSAP. We also note that not all NBSAPs will have national targets that directly corresponds to a global target, some will probably include elements that are better described as actions. These actions may not have a one to one relationship with a specific goal and targets, but may still contribute to a number of goals and targets. We suggest to add a text referring to successive NBSAPs in line with what is now in para 15 of the SBI/3/L15, this would replace last sentence under a): a bis *“Successive NBSAPs: Parties should revise or update their NBSAPs, including national targets and actions, and/or implementation of existing national targets and actions after each periodic global biodiversity stocktake with a view to further enhance their efforts to implement the global biodiversity framework and the Convention “.* Norway would like to see a cyclical approach to enhance the implementation of the GBF and the Convention, and support a strong call to parties to update and revise NBSAP in light of the outcomes of the global stocktake with a view to enhance our efforts. Enhanced efforts can in our view both involve strengthening the implementation of existing targets, and/or formulating new national targets.
  - b) The language in this para is difficult to understand. Our understanding is that we are asking parties to provide information on how parties plan to contribute. We do not object to the content, but prefer simpler language. Our suggestion would be along the following lines: *Information on how parties plan to contribute to the global targets, through their national targets and actions. All NBSAPs should provide relevant information on the implementation, including timelines, finance and a rationale explaining the degree to which the NBSAP contributes towards the achieving the global goals and targets.* We believe this text will create a clearer link between global goals and national efforts.
  - c) The information from headline indicators, as well as component and complementary indicators should also feed into the global biodiversity stocktake, and future revisions and updates of the NBSAP based on the outcomes of the global biodiversity stocktake.
- Para 7 - The para can be understood as an effort to make a distinction between NBSAP aligned with the GBF and targets as contributions to the GBF. We do not support the idea of two different timelines for the communication of NBSAPs and national targets. NBSAP is the primary vehicle for national implementation. We acknowledge that some parties will not be in a position to update their NBSAP by COP16, and in that event we are open to the possibility of communicating national actions and targets as an annex to the NBSAP. This annex to the NBSAP should have the same “deadline” as the NBSAP updates. Parties in a position to update sooner than the NBSAP deadline may of course do so, but we need to set a common, joint deadline for both NBSAP and NBSAP annex. The exact timeline will be subject to negotiations.
- Para 8, suggest to delete. Too prescriptive. In line with our comment on para 7.

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

<b>Section</b>	<b>Comment</b>
1	<p>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> <p>We support a stronger link between the national and global targets in the NBSAPs post COP15. National actions and targets should be specifically linked to the global goals and targets of the GBF. We also support that parties should explain how their national targets and actions are contributing to reaching the global goals and targets of the GBF.</p>
2	<p>Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.</p> <p>This element has not been discussed by parties. If we are to approach this element in a table as suggested it has the potential to become very complicated as responsibility to implement is often shared between a number of bodies.</p>
3	<p>Please provide comments on section 3 on the linkages with other national initiatives and targets.</p>
4	<p>Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments.</p> <p>We would like to see an opportunity for parties to report on national targets that relate to article 5 of the Convention</p>