**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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.   * South Africa has noted a lack of clarity on the difference between “review” and “update” and whether the timeframes are different for these and what falls into review and what into update; * Para 5: there should also be an explicit timeframe for the update; * Para 7 has the timeline for aligning the NBSAP with the GBF and the outcomes of SBI-3 has also made a proposal to submit an updated NBSAP by COP16. Paragraph 7 should align with this proposal. Another useful aspect could be to provide a diagram detailing actions by parties with clear timelines; * Building from the experience from the previous strategic plan, Parties were given a timeline for update of NBSAP up to 2015, which was five years into the timeframe for the strategic plan, leaving only 5 years to implement. Now the proposal to reduce the time to align the NBSAP with the GBF may result in problems for implementation, noting that only a few countries managed to submit their revised NBSAP by 2015 and we still have countries that don't have first NBSAPs or updated (2015) NBSAPs. Hence our proposal is that taking into account national circumstance and given that this decade is mainly dedicated to putting biodiversity on the path to recovery we propose a three year timeframe instead of two for updating the NBSAP in order to undertake a thorough revision process to lay the basis for effective implementation. One year will result in poor quality plans, poorly consulted, and thus difficult to implement. We would also like to note that in many ways the process of developing the NBSAP is as important as the product - if the process is too rushed to build broad buy-in and commitment among relevant stakeholders, the NBSAP product will inevitably be weak. A rushed process to review and update the NBSAP is not consistent with Para 2, which emphasises the need to involve all government sectors and all stakeholders across society, as well as to garner high-level political support. A thorough process for reviewing and updating the NBSAP will also support its mainstreaming into other national policy processes and plans as required in Para 10, by allowing for stakeholders involved in developing those policies and plans to be brought into the NBSAP process. * This guidance document should pick up on the discussion currently contained in SBI-03-L15 which makes suggestions on the review, update and implementation of the NBSAP, including the proposed global stocktaking exercise and the ratcheting of national commitments (i.e. updating and increasing national commitments). This has links with means of implementation - it should be clear whether requirements for ratcheting national contributions will be accompanied by reassessment of resources required. * Para 6 (b) refers to the need to develop a national biodiversity finance plan linked to the NBSAP. It may be useful to clarify whether the national biodiversity finance plan should be a standalone document or is envisaged as a section of the NBSAP. * Para 6 (c) refers to the use of “national indicators and headline indicators as well as component and complementary indicators where relevant”. Our understanding is that the headline indicators are intended to be used at the national level, and thus that the headline indicators ARE national indicators. Using the phrase “national indicators and headline indicators” implies that the headline indicators are NOT national indicators. We request that the wording in this document and all other documents where the indicators are mentioned should refer to use of “**the headline indicators, the component and complementary indicators where relevant, and other national indicators where relevant**”. This allows for the use of additional national indicators, over and above the headline indicators and the component and complementary indicators, should Parties have additional indicators that they would like to use that are not covered in the monitoring framework for the GBF. (This proposed wording is very similar to the wording in Para 2 of the annex on the national reporting template.) | |
| 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. |
| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target. |
| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.   * We suggest separating the question about whether this target is related to a previous target in the Strategic Plan for Biodiversity 2011-2020 from the question about whether it is related to other current national targets or national commitments. * We suggest asking whether the target is directly related to other national targets or national commitments. There will likely be a very large number of indirect links between biodiversity targets and a range of other targets, and it may be useful to keep this question quite focused. |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. |