**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: Revised guidance and template for the seventh and eighth reports contained in annex to CBD/SBI/3/11/ADD1/AMEND1**

|  |
| --- |
| **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**  | Revised guidance and template for the seventh and eighth national reports, contained in annex to the document CBD/SBI/3/11/ADD1/AMEND1 which includes a draft of Annex C to CBD/SBI/3/CRP.5. This template aims to collect feedback on that Annex.  |
| ***Contact information*** |
| **Surname:** | Qwathekana |
| **Given Name:** | Malta |
| **Government** (if applicable)**:**  | South Africa  |
| **Organization:** | Department of Forestry, Fisheries and the Environment  |
| **Address:**  | 473 Steve Biko Road,  |
| **City:** | Pretoria |
| **Country:** | South Africa  |
| **Postal Code:** | 0001 |
| **Phone Number** (including country code)**:**  | +27 78 093 6266 |
| **E-mail:** | MQWATHEKANA@dffe.gov.za  |
| **Comments** |
| Please provide any general comments on the structure of the draft template for the seventh and eighth national reports, as well as the introduction to the template. Para 4 mentions that the national reports should include financial reporting, to be confirmed at COP15. If this is confirmed, it would be useful to provide more detail on how the financial reporting relates to the national biodiversity finance plan. Paragraph 11 on the use of headline indicators for monitoring and reporting proposes that national report templates could be pre-populated or pre-filled with available national data or disaggregated from global datasets. South Africa recommends that instead of providing pre-filled or pre-populated indicator values, the global disaggregation is provided in a form of information that a Party may wish to use in filling in this section of the national report. In other words, the indicator value should be left blank, with possible globally disaggregated values provided in a separate place that can be cut and pasted in. This would help to reinforce the need for all indicators to be nationally validated, which we feel should have greater emphasis in this paragraph and elsewhere. We also suggest that the information based on global disaggregation is retained in the report even if a country chooses to use its own national information. This would present a useful opportunity to gather information about why parties choose not to use global information provided (for example, explaining why the global disaggregation is not accurate/suitable) and why they prefer to use their own national datasets and information.We suggest something along the lines of the following table be provided for countries to complete:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Indicator | National metrics | Global metrics | Use Global metric?  | Comment |
| A | 4567 | 1234 | NO | National data and methods used – global data not suitable for xyz reason |
| B | na | 8910 | YES | Global data used but interpretation is adjusted due to local circumstances |
| C | na | 4334 | YES | Use global as is |
| D | 22 223 | 23 423 434 | NO | Global data used in calculating national metric but classification adjusted to be useful in national context  |

Under Paragraph 12, South Africa we would like to emphasize that the DaRT tool should be country driven noting that its intention is to support governance processes at the national level.On paragraph 13 and building on lessons from the UNCCD process, the GBF reporting tool must allow for easy addition of nationally computed indicators (using national or global data with national adjustments) where required. The tool must also allow for clear validation and acceptance or rejection of globally pre-populated indicators (to avoid confusion). In addition the metadata for the globally computed indicators must be easily accessible within the tool. The SDG process also provides a lesson in that it made national computation the "default" preferred approach, providing the globally computed metrics to be used where appropriate (as decided by parties). It is important not to overwrite the global with national data, rather make space to have both, with clear decisions with reasons why global is not preferred.In paragraphs 11 and 13, and elsewhere in the document, we suggest avoiding using the terms “pre-filled or pre-populated”. Instead of saying that Parties will be able to accept data that is pre-filled, the text could say that Parties will be provided with information based on global disaggregations that they could use to fill the template. This may seem to be a subtle distinction but we feel it is important. It increases the degree of agency that Parties have and affirms the need for engaging with all the indicators at the national level.  |
| Please use the table below to provide any specific comments on the template:  |
| **Section** | **Comment** |
| I | Please include comments or specific suggestions for Section I. Executive summary of the seventh and eighth national reports.We suggest adding an additional section (fourth row in the table) dealing with lessons learnt in relation to implementing the GBF and NBSAP over the course of the reporting period. (This links to paragraph 7 of Annex D on the country-to-country review, which says that national reports provide an important basis for the country-to-country review. It will be helpful for countries to have reflected in the course of developing their national reports on lessons learnt in dealing with challenges in implementation.) |
| II | Please include comments or specific suggestions for Section II. Brief overview of the process of preparation of the report |
| III | Please include comments or specific suggestions for Section III. Status of the updated or revised NBSAP in the light of the post-2020 global biodiversity framework (This section is for the seventh national report only) **Has your country’s updated or revised NBSAP or biodiversity action plan been adopted as a policy or legal instrument?**Please clarify the meaning of "biodiversity action plan”. This makes it seem that there's an option to go for either an NBSAP or a biodiversity action plan.**Integrated into the poverty reduction strategy, sustainable development strategy, national development plan, and other related strategies or plans**We suggest that this is a separate issue to adoption of the NBSAP as a legal mechanism, and should be a question in its own right (i.e. a separate row). This is about mainstreaming the NBSAP. It should say "poverty and inequality" not just poverty.It may be useful to include a question in this section about the status of the national biodiversity financial plan. |
| IV | Please include comments or specific suggestions for Section IV. Assessment of progress towards the 2050 goals of the post-2020 global biodiversity frameworkRather don't preempt the decision to remove the milestones. May need assessment of milestones if they are finally included in the GBF.We raise here our earlier points in relation to para 11 and para 13 that we would prefer that Parties are provided with information that they may wish to use in populating the headline indicators for Goals and Targets, rather than being provided with pre-filled or pre-populated indicators. Also that it would be useful to retain information about whether parties choose to use the globally provided information or to use their own national information and why.We suggest adding a question for each Goal: Please reflect on any lessons learnt in working towards this Goal, for example related to successes achieved or challenges overcome or different approaches to be used going forward. These lessons could then be synthesised in the Executive Summary. |
| V | Please include comments or specific suggestions for Section V. Progress towards the 2030 action targetsWe raise here our earlier points in relation to para 11 and para 13 that we would prefer that Parties are provided with information that they may wish to use in populating the headline indicators for Goals and Targets, rather than being provided with pre-filled or pre-populated indicators. Also that it would be useful to retain information about whether parties choose to use the globally provided information or to use their own national information and why.We suggest adding a question for each Target: Please reflect on any lessons learnt in working towards this Target, for example related to successes achieved or challenges overcome or different approaches to be used going forward. These lessons could then be synthesised in the Executive Summary. |