**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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. * A guidance document to be adopted at COP15 will be key in helping Parties to update their NBSAPs in a timely, consistent, and effective manner. We, therefore, are grateful for the opportunity to comment on this draft.
* We note the title of this document refers to ‘guidance for updating national biodiversity strategies and actions plans’ and this terminology should be used throughout. The plural reference to

strategies and plans is consistent with Article 6 of the Convention.* To avoid misinterpretations, we support reference to the ‘post-2020 global biodiversity framework’ rather than ‘biodiversity’ (in paragraphs 2 and 6a).
* In general, we suggest that there should be clarity and consistency in the language used to describe what is expected of Parties in terms of reviewing, revising, updating or adapting NBSAPs (both here and in Annex C). Currently all four of these terms are used throughout this document in relation to NBSAPs. We suggest that only ‘review’ and ‘update’ should be used, both here and in Annex C in relation to NBSAPs.
* In **paragraph 1,** we would like to see specific references to the associated decisions of the Conference of the Parties to the Convention and of the Conference of the Parties serving as the meetings of the Parties to the Cartagena Protocol on Biosafety and the Nagoya Protocol on Access and Benefit-sharing. A footnote may be the most appropriate format.
* In **paragraph 5**, the guidance suggests that NBSAPs ‘should include’ many elements which we think are too prescriptive. We would prefer more flexible wording such as ‘considering… as appropriate’ to capture the need for NBSAPs to be adapted to national circumstances. We would also like more clarity in what is expected of Parties at this point. We propose the following text for paragraph 5:

Upon the adoption of the post-2020 global biodiversity framework, Parties should review, and update as appropriate, their NBSAPs ~~and their existing national targets~~ to align them ~~to determine the extent to which they are aligned~~ with the new framework~~.~~, considering ~~This review should be completed within 12 months of the adoption of the new framework and should include~~ implementation gaps, existing goals, targets and indicators, monitoring systems (including existing data, knowledge and knowledge systems), sectoral and cross-sectoral policies, finance and other means of implementation, and an assessment of the stakeholders and rightsholders involved in revision and implementation, as appropriate. ~~This exercise will allow Parties to determine the extent to which the NBSAP is already aligned with the new framework and to identify those aspects of components that may need to be revised. In this way, the time and effort required to update the NBSAP can be minimized.~~* We suggest that **paragraph 6a** should begin as follows:

National targets aligned with the post-2020 global biodiversity framework and provided in a standardized format: […]* In **paragraph 6b**, the reference to inclusion of finance plans will depend on outcomes of Resource Mobilisation discussions. The UK is supportive of national biodiversity finance plans but believes that Parties should retain flexibility in the methodology used for developing, updating, and implementing the finance plans. Therefore, ‘or similar instrument’ should be inserted after ‘national biodiversity finance plan’, in this paragraph and elsewhere. We find the paragraph is over prescriptive and propose the following amendments to paragraph 6b:

Concrete action plans ~~detailed spatially, temporally and financially~~: All NBSAPs should contain concrete actions planned ~~spatially, temporally, and financially~~ to help the country meet its national targets and contribute to the global goals and targets, including spatial, temporal and financial aspects, as appropriate. ~~The resources necessary for implementation should be identified through the development of a national biodiversity finance plan, and t~~The NBSAPs should be developed in consultation with actors responsible for their implementation ~~of NBSAPs should be identified and agreed at the time of planning and writing so that~~in order to secure their buy-in and participation ~~is guaranteed. The action plan is a fundamental part of national biodiversity planning and should be the roadmap which guides and facilitates implementation throughout the lifespan of the national biodiversity strategy and future iterations thereof~~. The resources necessary for implementation should be identified through the development of a national biodiversity finance plan, or similar instrument.* We support Japan’s and EU’s comments on indicators in **paragraph 6c**, as submitted to the Secretariat in February 2022, and copied below:

Japan: ‘At the stage of developing the NBSAP, headline indicators and national indicators consistent with the monitoring framework should be set, taking into account national circumstances.’EU: ‘The NBSAP should identify the indicators to be used, the relevant agencies responsible for collecting the data and compiling those indicators, any need for further development of such indicators and any capacity building needs.’* Also in **paragraph 6c**, we suggest changing ‘review mechanism’ to ‘assessment’, to emphasise the role of NBSAPs in planning rather than review processes. Similarly, we suggest changing ‘review’ to ‘reviews’ when detailing country-by-country reviews to allow the sentence to encompass both voluntary peer reviews and open-ended forums.
* To clarify timelines in **paragraph 7**, we suggest the following text:

NBSAPs should be updated to align with the post-2020 global biodiversity framework and submitted through the clearing-house mechanism of the Convention in time for consideration at COP16. The ~~N~~national targets in NBSAPs ~~in a standardized format~~ should be provided in a standardized format ~~communicated to the Secretariat within one year of the adoption of the post-2020 global biodiversity framework,~~ using the template included at the end of this annex.~~, through the clearing-house mechanism of the Convention~~. As mentioned above, in the case where existing national targets are already aligned with the new framework, it will be sufficient to enter them into the template, link them to the new global targets, and explain their alignment. New national targets will also need to be linked to the global targets and their contribution explained. In the event that NBSAPs cannot be fully updated and submitted in time for consideration by COP16, Parties are still urged to provide a summary of relevant national targets and actions using the template provided in the annex. ~~This information could be submitted ahead of submitting a revised NBSAP. However, Parties that decide to update or revise their NBSAP within one year of adoption of the new framework could submit an updated or revised NBSAP and the national targets simultaneously.~~* We propose the following text changes to simplify **paragraph 8**:

The concrete actions that are planned in order to achieve the national targets can include the identification of financial and capacity building and development needs. ~~The concrete actions that are planned in order to achieve the national targets can be adapted/developed either at the same time as the targets or as a second step after they have been established. The development of these actions should go hand in hand with the development of national finance plans that all planned actions have corresponding funding sources identified.~~* We suggest the following changes to **paragraph 9**:

Parties are encouraged to use a whole-of-government and whole-of-society approach to review, update and implement ~~for the revision, implementation and review of~~ their NBSAPs~~. They should develop, enhance and/or maintain~~, including, for example, a national coordination mechanism, including representatives of key government ministries and authorities (including at the subnational and local levels), national focal points for the Cartagena and Nagoya Protocols, national focal points of the biodiversity-related conventions and Rio conventions and for the Sustainable Development Goals, representatives of national statistical institutes and other data holders, indigenous peoples and local communities, non-governmental organizations, women’s groups, youth groups, the business and finance community, the scientific community, academia, faith-based organizations, representatives of sectors related to or dependent on biodiversity, citizens at large, subnational authorities and other stakeholders, to oversee the revision, implementation, monitoring and review of the NBSAP and other biodiversity-relevant instruments. |
| 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.* We welcome the template, but we think it could be streamlined to make it less burdensome for Parties to produce. We think that section 1 is sufficient to understand the relationship between national targets and global targets.
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| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.* We are not sure why this information is needed and how it will be used. Targets have many elements and may have several bodies responsible for their implementation which would make this section very complex.
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| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.* We would like to ensure that this remains a simple list of targets to enable a global analysis of ambition. We query whether the additional information requested in this section is necessary.
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| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. * We would like to ensure that this remains a simple list of targets to enable a global analysis of ambition. We query whether the additional information requested in this section is necessary.
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