**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**

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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**  | 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.  |
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| **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. General comments: * We are grateful for the opportunity to comment on the revised guidance and reporting template for the seventh and eight national reports. Agreement on the scope and format of the national report is a crucial aspect of an ambitious planning, reporting and review mechanism.
* All text in the guidance and template should align with the decision text (once finalized), and the text in the guidance and template should also be consistent (for example, there should be consistency in the way that all the decision documents refer to “headline, national, complementary and component indicators”.)
* We think the proposed template is too burdensome in some places and should be streamlined.
* Overall, we suggest the word counts are too restrictive in every section of the template. This may present problems for Parties to communicate their answers with sufficient detail.
* As with all other annexes, in line with Article 6, references to ‘the NBSAP’ should be plural, i.e. ‘NBSAPs’. The plural reference to ‘strategies and plans’ is consistent with Article 6 of the Convention.

Comments on the draft guidance: * The timelines of submission of NRs will need to be aligned with the decision text as appropriate, e.g. national reports should be submitted in time to feed into the global stocktake.
* We would welcome streamlining the draft guidance to avoid duplication with the decision text.

We propose the following changes to the text:* We suggest that the text (marked with strikethrough) in **paragraph 2** (below) is moved to **paragraph 3** (with amendments) to ensure that the text refers to both the 7th and 8th national reports:

**Paragraph 2:** The seventh national report should provide an initial assessment of progress made towards the post-2020 global biodiversity framework, while the eighth national report will provide a comprehensive review of progress in implementation.~~, using the most up-to-date data and information from as many sources as possible, including the headline indicators and the component and complementary indicators and other national indicators, where relevant, as well as the most recent reviews of national implementation and other national assessments, in particular the review of the implementation of national biodiversity strategies and action plans (NBSAPs) that provide a basis for developing national ambition or targets and/or updating or revising NBSAPs to implement the post-2020 global biodiversity framework.~~**Paragraph 3:** The seventh and eighth national reports should provide an assessment of progress in the implementation of the post-2020 global biodiversity framework, using the most up-to-date data and information from appropriate sources, including headline indicators, optional component and complementary indicators, and other national indicators, where relevant. Other sources may include any recent relevant reviews of national implementation or other national assessments, in particular any review of the implementation of national biodiversity strategies and action plans (NBSAPs). ~~in particular outcomes of actions taken, drawing upon information concerning the implementation of national biodiversity strategies and action plans in particular national targets therein, and other actions taken to implement the Convention. To enable global analysis of progress, Parties should use the headline indicators of the post-2020 global biodiversity framework in assessing their progress at the national level.~~~~2~~ ~~They may also wish to the use the component and complementary indicators, and other national indicators, as relevant and appropriate.~~* We suggest that the inclusion of financial reporting in the national reports (**paragraph 4**) will complicate the national reports unnecessarily, and we request that financial reporting is kept separate. Any new actions such as this should be determined in the decision text and then carried through to the draft guidance.
* We suggest the following text changes to **paragraph 5**, as other conventions cannot form the basis of assessing progress in the context of the post-2020 global biodiversity framework, but this information can be considered, where relevant: […] Parties are further encouraged to use national reports, reviews or communications submitted under ~~these~~ relevant conventions and in connection with the Sustainable Development Goals as ~~an~~ important information ~~basis~~ for assessing progress in the implementation of the post-2020 global biodiversity framework.”
* In **paragraph 7**, we are concerned that the footnote relating to the Annex is too open-ended and we would like to see specific reference to relevant decisions. The national report may not always be the best way of collecting information on a range of different issues.
* We propose the following changes to the text for the final sentence of **paragraph 8**:

In addition, Parties are encouraged to provide links to relevant websites and publications ~~documents~~ where additional information, including metadata for indicators, may be found, reducing the need to include this information directly in the national report. * We suggest removing the qualifier ‘*headline’* in the **heading between paragraphs 10 and 11** to allow for relevant national indicators, and/or component and complementary indicators to be utilized: Use of ~~headline~~ indicators for monitoring and reporting.
* We would like the text of **paragraph 10** to emphasise the primary role of the national reports in supporting the global stocktake or review. We suggest that (10a) is brought into the main text of paragraph 10 to highlight this primary role. Paragraph 10 would then read:

10. The information contained in the seventh and eighth national reports will primarily support a mid-term and final review of the implementation of the post-2020 global biodiversity framework by the Conference of the Parties, and could also be used, as appropriate, to inform, among other things, the following:~~(a) A mid-term and final review of the implementation of the post-2020 global biodiversity framework by the Conference of the Parties;~~(a)~~(b)~~ Any country-by-country reviews…* Furthermore, we think that footnotes highlighting that paragraphs are subject to decisions to be made at COP15 are not necessary, as the whole text is subject to the decisions made at COP15.
* The use of available national data and data disaggregated from global datasets in national reports requires further consideration and testing. For example, it is not clear how differences between such disaggregated data and national data would be reconciled and re-aggregated at the global level. We do not support the use of pre-populated data in the reporting template but we could support the use of tools which provide nationally disaggregated data for consideration by Parties. We propose several text changes in **paragraph 11**. ‘Enable’ should be changed to ‘facilitate’, as processes for aggregation of national data need to be further tested before we can be sure that indicators will enable this in all cases. Headline indicators should, as far as possible, be used in national reports. We would prefer to avoid the term ‘component’ because it could be confused with ‘component indicators’. **Paragraph 11** would then read as follows:

To ~~enable~~ facilitate global aggregation and analysis of progress, ~~the use of~~ headline indicators, agreed in the monitoring framework of the post-2020 global biodiversity framework, should, as far as possible, be used ~~is proposed as a component to be included~~ in national reports. ~~National report templates could be pre-populated with available national data and disaggregated from global data sets or national data that is publicly available. Parties would then have the option to use the available data, to propose an alternative data set or to report “no data”/“not relevant”.~~ Countries are also encouraged to use optional component and complementary indicators as referenced ~~contained~~ in the monitoring framework of the post-2020 global biodiversity framework as well as other relevant national indicators, as appropriate. * We request clarification of how the online reporting tool mentioned in **paragraph 13** would work in conjunction with DaRT. The use of different tools needs to be efficient and streamlined and avoid the risk of double counting.
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| 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 would suggest deleting “ambition gaps” and focus on ‘Key challenges’.
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| II | Please include comments or specific suggestions for Section II. Brief overview of the process of preparation of the report* We have no comments for this section.
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| III | Please include comments or specific suggestions for Section III. Status of the updated or revised NBSAPs in the light of the post-2020 global biodiversity framework (This section is for the seventh national report only) * We suggest that this section should also be included in the eighth national report for any late or second updates.
* If NBSAPs have been updated, a date should also be provided in the first ‘yes’ tick box.
* We would like to see free text sections throughout this table that would enable further explanation of local circumstances relevant to the answer provided (e.g. Parties with sub-national reporting responsibilities).
* With regards the question on adoption of a policy/legal instrument, this is not a simple yes/no answer. NBSAPs may consist of different elements some of which are adopted as policy or legal instruments and others not. We suggest the inclusion of “other” as a response, with the ability to provide free text.
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| IV | Please include comments or specific suggestions for Section IV. Assessment of progress towards the 2050 goals of the post-2020 global biodiversity framework* We suggest column headings for this table as follows: ‘assessment of progress to 2050 goals’, ‘trends in headline indicators’, ‘trends in other relevant national indicators’, ‘source of data for indicators’.
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| V | Please include comments or specific suggestions for Section V. Progress towards the 2030 action targets* This section needs to focus on contributions to global targets. Parties could include information for specific national use in a separate voluntary section of the report.
* Reference to indicators here should reflect the language to be agreed in the decision text.
* We do not support the pre-population of data in national reports. We prefer that such disaggregated data are made available separately to Parties for their consideration.
* In our view, although Parties should be encouraged to undertake analyses of effectiveness of actions for their own purposes, this may not need to be part of this global level reporting template. If the national analysis of effectiveness of actions will not be used in a global level analysis, we do not feel it is necessary to collect this information for the national report. Therefore, we suggest deleting the analysis of effectiveness questions from the template.
* When providing the source of data relating to indicator(s), there may be multiple sources for complex indicators. Therefore, we suggest: “*Source(s)*” and “*and references to relevant metadata”* to be included. Similarly, the question below should be expanded to include other indicators and forms of assessment, we suggest: “*Based on the value of the headline indicator(s) provided above, together with other indicators and forms of assessment, please indicate the current level of national progress that has been made towards the associated global target:”*
* We suggest merging the final box, relating to use of other indicators or tools to assess progress, with the box above, for simplification.
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