**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**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in CBD/SBI/3/11/ADD 6**

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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| **Scope of this template for comments**  | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in the document CBD/SBI/3/11/Add.6, which includes a draft of Annex B to CBD/SBI/3/CRP.5. This template aims to collect feedback on that Annex.  |
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| **Comments** |
| *Please include general comments on capturing commitments from actors other than national governments.** We strongly agree that non-state actors should be involved in the delivery of the post-2020 global biodiversity framework. Greater visibility should be given to their commitments or planned actions, and the progress made in implementing them, so that their contributions can be understood, acknowledged, and encouraged.
* Recognising that non-state actors have no reporting obligations under CBD, we would like further clarity on the overall purpose of this tool. We would see it as a tool for promoting engagement of non-state actors and sharing information that could be used by Parties in their national reports. This information could also be used for a general analysis of non-state actors’ contributions overall – but could not be simply aggregated with information in national reports.
* New actions, requests to Parties and other organisations etc should be captured in the decision text rather than the annex. Text and terminology should align with the decision text.
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| 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 on general information on the actor.** We have no specific comments here.
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| 2 | *Please provide comments on section 2 which includes the section on specific commitments from actors other than national governments.** In general, we think that there should be more positive language about engagement with non-state actors in this section, and that non-state actors should be encouraged to share information rather than using language that implies that this is a reporting requirement. For example, specific edits to text could include:

~~However, there could be risks emerging from greenwashing and negative influencing on the intergovernmental process.~~ To ~~counter these risks and~~ enhance accountability and transparency, and provide greater visibility and encouragement, commitments from actors other than national Governments should be aligned with the post-2020 global biodiversity framework.* We would like to seek clarification on the use of the phrase ‘actors other than national governments’ here. The L document (L-15) currently refers to ‘non-state actors’. The Sharm el-Sheikh to Kunming Action Agenda for Nature and People refers to ‘sub and non-state actors’ – terminology should remain consistent across this guidance. We would like to ensure that this language does not have unintended consequences for sub-national governments. For example, sub-national governments in the UK are full partners in the implementation of the Convention and report through the National Report.
* There are potential issues of double counting especially if this also includes sub-national governments. Parties may wish to include contributions from sub-national governments, as well as contributions by voluntary and private sector partners within national reports, where appropriate. The platform could be used by Parties to collect information about relevant non-state actors’ contributions.
* We would like further clarification on the expected timescales for the development of the metrics, guidelines and templates mentioned in sections 9a, 9b and 10 of this annex.
* We do not see the need for a tight one-year timeframe for submission for a voluntary information sharing process considering the burden this would create. We would expect the platform to be open for additional inputs at any time, though the secretariat may publish a deadline by which any information in the platform would be extracted to be used in a specific analysis such as an analysis of non-state actor contributions which could be considered at SBI meetings and contribute to national reports and global stocktakes.
* We would like further clarification on the coalitions of actors mentioned in sections 9a and 10 of this annex.
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| 3 | *Please provide comments on section 3 on progress tracking.** We note that there is not a process to capture the progress towards and the results of these commitments. Contributors to the platform should also be asked to provide regular updates on the progress made in the delivery of commitments.

We suggest that there should be reference here to the monitoring framework. Non-state actors should be encouraged to make use of those indicators where possible or where relevant. |