**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**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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| **Scope of this template for comments**  | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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.* It is the responsibility governments to ensure that all policy and planning instruments are developed in a participatory and collaborative manner with all the stakeholders (indigenous, local communities, unions, private sector, NGOs) that are not part of the national government to find joint solutions. Propose "voluntary" commitments with those sectors that have the greatest impact on biodiversity (for example, the private sector) is an accounting, transparency, non-co-responsibility risk, and contributes even more to weakening the NBSAP as the main instrument for implementing the goals of the CBD.
* As far as possible, non state actors’ commitments should be included under NBSAPs. However, using already existing platforms such as the Sharm El Sheikh to Kunming Action Agenda for Nature and People could also be helpful to centralize the information in the case in which there’s an impossibility to include non-state actors’ commitments as part of NBSAPs.
* Paragraph 5: It is not clear how these reports are linked to the NBSAP. Are they reported to the CBD Secretariat without articulation with the NBSAP or without being included as part of the National Reports or without reporting to the national indicators?
* Paragraph 7: the agreed indicators would be the same as the headline indicators of the GBF monitoring framework? If different how to ensure alignment with the headline indicators in order to enable the monitoring and review of these commitments under the gap analysis and global stocktakes?
* Paragraph 9(a): what are coalition stocktakes?
* Paragraph 9(b): ideally, subnational and local authorities should report with metrics and methodologies used by national governments in order to build the national reports.
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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.* The note in Section 1 lacks coherent with the annexes on national reporting and NBSAPs which propose sections or annexes in the templates to include commitments/reports of non-state actors. Therefore, we propose the following text:

“Note: Reporting of actors other than national Governments may occur through NBSAPs, National Reports, the Sharm El-Sheikh to Kunming Action Agenda for Nature and People or via reporting through a stakeholder coalition. The fields identified below represent a minimum set of pieces of information which are needed in order to analyse the commitment in the context of the post-2020 global biodiversity framework, including for global aggregation. Additional information may be included in the various reporting initiatives which go beyond this core set of information. Commitments which do not include this minimum information may still be included in various reporting initiatives; however, commitments without these core elements are not included in the enhanced planning, monitoring, reporting and review mechanism under the Convention”.* If the geographic scope is local or national, non state actor commitment should be included in NBSAPs as far as possible.
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| 2 | Please provide comments on section 2 which includes the section on specific commitments from actors other than national governments.* Paragraph 10: if the geographic scope of a commitment is local or national, the description should also include if it’s contributing to a national target under a NBSAP, or refer to alignment with the national targets defined under a NBSAP.
* Paragraph 13: not only SDGs but other related MEAs.
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| 3 | Please provide comments on section 3 on progress tracking. |