**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**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**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. NBSAP is the key planning document in the context of the CBD including for any review and reporting under the Convention. This template suggested for comments covers only one specific element of the NBSAP to be reviewed as relates to targets and actions addressing elements of the GBF. This comment template does not allow to really comment on NBSAP review. We are concerned with this approach. It provides for a rash development of only individual targets to be provided to the SCBD. It may undermine the whole national process of NBSAP update and lead to the point that Parties will focus on quickly developing targets only and not on the entire NBSAP. In this case adoption of those targets as policy or legal instrument(s) will be significantly more complex or not in place at all, and will lead to low or no status of those targets at national level. We do not encourage this approach when targets need to be provided before NBSAP is formally approved. |
| Please use the table below to provide any specific comments on the template:  |

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| **Section** | **Comment** |
| 1 |  |
| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target. |
| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.**Is this target (or a part thereof) related to a national target or other national commitment already made by your national government in the context of the Strategic Plan for Biodiversity 2011-2020, the 2030 Agenda for Sustainable Development, other environmental conventions or another process?**Make it explicit about link to other MEAs |
| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. This part is not clear. Usually **commitment submitted separately by subnational governments, or other actors beyond national governments** is part of the national commitment and not other way around. It is suggester to change the language as follows:**Is this national target also includes part(s) of a commitment submitted separately by subnational governments, or other actors beyond national governments?**If **subnational governments, or other actors beyond national governments** are supposed to provide their input directly to the CBD as a separate contribution the CBD needs to establish clear rule that those actors when submitting their targets and actions are formally and directly inform the CBD national focal point about those their submissions. This will guarantee government can really answer this part of the template. And still we cannot agree and support to consider national commitments as only a PART of the targets of other non-governmental players |