**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**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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| **Scope of this template for comments** | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms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.   * *The paper recognizes there are large differences in reporting styles which pose challenges for comparing commitments within and between countries. This makes it difficult to gain a common understanding of the potential contribution of commitments made by non-state actors to the global goals and targets. This document provides options to enable consistency to enable monitoring progress. There should be capacity building on mapping, reporting and global data standards to ensure consistency in data submissions, and to facilitate tracking at the global scale in line with the target indicators.* * *Be clear that ensuring that commitments are measurable, geographically specific and transparent will enable comparability, aggregation, monitoring and reporting.* * *This document does not provide clarity on how commitments are followed through and how you compare between platforms and standardize this information. The challenge is to mobilize the information further, and recognition of other relevant commitment platforms could be referenced. For example, the UNEP-WCMC area-based commitments platform, the IUCN Nature Contributions Platform and the ICLEI Action Platform.* * *Some clarity on the type of commitments being sought would be useful. Is the intention to capture broad commitments (e.g. business commitments not to operate in UNESCO World Heritage Sites) or place based/area commitments (e.g. investment into specific restoration efforts or NbS)?* * *Articulating the benefit for actors in adding their commitments would be a useful addition. Finding ways to incentivise and secure buy-in from actors to add commitments may be a challenge. What is the benefit of them providing a commitment, if they could just report the areas once implemented. We do not want to increase the reporting burden without providing incentives and reasons for doing so.* * *Paragraph 6 on accountability and transparency measures – suggest wording to include the need to encourage commitments across all geographic areas with the aim of achieving a balanced set of commitments, and encouraging specificity on location, in particular sub-national locations to support this ambition.* * *Paragraph 7 on monitoring and reporting requirements – suggest wording to include examples, such as area or number of hectares or km2. This will help translate commitments into measurable or numerical targets where relevant. In other cases, comparison to a reference year would allow monitoring progress to achieve global goals.* * *It might be useful to consider the total potential commitments from a given country in combination with formal reporting platforms to yield gap reports to give insight into how much of a country’s potential contribution has actually been delivered.* * *When we say agreed indicators, does it mean the indicators that will be developed for tracking the proposed targets of the gbf? It would make sense for them to be aligned so that commitments can be pulled directly and easily into platforms measuring implemented measures (i.e. Protected Planet Initiative for target 3)* * *Paragraph 8 on the Action Agenda – include wording here that emphasizes that in order for this site to succeed it must be populated with non-state actors’ commitments. For it to succeed the Action Agenda should also encourage users to learn about other commitments. There are again, other commitment platforms that are trying to do this. For example, the UNEP-WCMC area-based commitments platform, and the ICLE Action Platform.* * *It is unclear how submission of inaccurate information is being discouraged? This links to the greenwashing aspect mentioned above.* * *Paragraph 9 on conditions - suggest wording to include developing a pathway from commitments to implementation which would then provide a clear link to national policy and planning. This could be as simple as noting the stage at which a commitment has been completed* * *Sub-paragraph 9 (b) references SBTi, should this be SBTN? Also, this point includes reference to identification and monitoring of impacts and dependencies, what does this mean in the context of these commitments?* * *Avoiding double counting will be important but it’s not clear from the current core reporting elements how this will be achieved in practice. Noting specifically that businesses/financial institutions may be investing into the same areas/offsets. Without GIS data and analysis it may not be possible to measure the extent of overlapping areas.* * *In addition to the above point, there may be a need to report the ownership type of an area, as we may have for instance, private actors submitting an offset on IPLC lands without their consent (free, prior and informed consent in the case of indigenous peoples). Perhaps we should consider asking whether this area is a) contested, b) overlaps with other existing commitments c) if yes to b, is the commitment gov or non-gov?* * *Is there any kind of verification mechanisms to be put in place to make sure the information is correct, has been provided with consent etc?* | |
| 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.   * ***Organization –*** *Further clarity will be needed on what lead organization means. For example, in many cases a private company may be making the commitment but a local community or NGO are working on the ground to deliver on the commitment.* * ***Name and Email of focal point*** *- Would the name and email address be featured publicly? This might be off-putting for business/finance. Also, consider GDPR issues where the name of a focal point and email address may not want to be public. Maybe an option to tick-box to share contact details. Be careful with sensitive information. Be clear on where data is stored. Be clear on what this information is going to happen.* |
| 2 | Please provide comments on section 2 which includes the section on specific commitments from actors other than national governments.   * *Make the language accessible to all. What is meant by ‘commitment/action’ for instance? It may seem obvious but it might not be obvious to all, so clear explanations need to be made at all points to ensure everyone is able to understand and contribute.* * *Bear in mind many will not be familiar with the CBD wording either so jargon will need to be reduced/removed and all questions and answer options screened for possible ambiguity.* * *This section is quite broad and would benefit from the inclusion of guidance on what sort of commitments qualify for inclusion. From the private sector perspective, companies are setting strategic level commitments/targets aligned with nature goals but also have more specific actions that they implement (e.g through restoration efforts, biodiversity offsets, social investment programmes).* * *A lot of this feels very broad which will make it challenging to analyze and aggregate. To allow for greater comparability, having more checkboxes / multiple choice options may help.* * *Something missing on scale/scope of the commitment - e.g. area based, national, global, landscape, value/supply chain, direct operations.* * *One key piece of information that is missing is the country. Suggest to use the ISO 3166-1 Alpha-3 code of the country/territory that the commitment geographically resides (or will reside) within.* * *A key piece of information that is currently missing here are clear objectives of your commitment.**Clear objectives should be identified when you first make the commitment so that it is clear when you expect these objectives to be realized. This will help report on the expected impact.* * *Make sure a link with the targets is provided for context, and to cross check to help data providers answer the questions* * *Be clear which are mandatory and which are optional. At the moment it says these are the minimum requirements, but also the SDG question is optional.* * *With respect to paragraph 13, consider changing text to “Sustainable Development Goals**or other MEAs or processes” to which the commitment contributes. This may assist Parties with reporting towards other Conventions and processes.* |
| 3 | Please provide comments on section 3 on progress tracking.   * ***Start date:*** *Clarify what this means:**Suggest to capture information on the year in which the commitment was pledged* * ***End date:*** *Is this when the commitment is fully implemented? Some commitments will be ongoing. Suggest for the end date to be optional to capture ongoing commitments as well as those that are time bound.* * ***KPI:*** *good to include area as a metric where possible. Expansion of an area or increase in species abundance etc.* * ***Monitoring and reporting:*** *Would be very useful if this information could be time stamped so people can come back to the same commitment and update it? A good option to include here is periodic reminders asking you to submit progress reports. There is no specific format for these. If you already produce progress reports for another purpose, you are welcome to share these. If not, we will ask you to provide a few sentences detailing the steps taken to date.* |