**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: Modus Operandi of the open-ended forum of SBI for country-by-country review of implementation** **contained in CBD/SBI/3/11/ADD 5**

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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** | Modus Operandi of the open-ended forum of SBI for country-by-country review of implementation, contained in the document CBD/SBI/3/11/Add.5, which includes a draft of Annex D to CBD/SBI/3/CRP.5. This template aims to collect feedback on that Annex. |
| ***Contact information*** | |
| **Surname:** | ANDRADE DE SOUZA |
| **Given Name:** | Luiz Eduardo |
| **Government** (if applicable)**:** | Brazil |
| **Organization:** | Ministry of Foreign Affairs of Brazil, Division of Biodiversity |
| **Address:** | Palácio do Itamaraty - Esplanada dos Ministérios - Bloco "H"- Brasília/DF, Brasil |
| **City:** | Brasília |
| **Country:** | Brazil |
| **Postal Code:** | 70170900 |
| **Phone Number** (including country code)**:** | +55 21 2030-8447 |
| E-mail: | dema1@itamaraty.gov.br |
| **Comments** | |
| Brazil understands that the discussions under agenda Item SBI 9 should focus on improving existing reporting, planning and review mechanisms, before considering the need of establishing additional modalities for reporting and review that will require substantial preparatory work and internal consultations and may risk diverting national efforts from the priority actions needed for the implementation of the Post-2020 GBF, adding undue burden on human and technical resources.  Many of the elements that would be discussed during the country-by-country review online dialogues could be addressed within the national reports and the NBSAPs. Improving the format of national reports and NBSAPs to allow a standardized submission of information would further enhance comparability amongst countries and enable a more in-depth understanding of capacity‑building, technical and scientific cooperation and/or other support needs, as described by Brazil’s proposals regarding documents **CBD/SBI/3/11/ADD 4** and **CBD/SBI/3/11/ADD1/AMEND1.** Hence, priority should be given to improving those mechanisms so that they can provide a comprehensive and scientifically and technically sound assessment of implementation at the national level.  In addition, many elements within document CBD/SBI/3/11/Add.5, such as the references to global stocktake on ambition and implementation, prejudge the outcomes of ongoing discussions under the Convention and therefore should be deleted. Brazil takes note with deep concern of the proposal to prepare “a global policy response from the COP”, as it builds on the inaccurate understanding that engaging in continuous revision of existing mechanisms such as the NBSAPs would lead to improvements in implementation, rather than addressing the underlying challenges that may hamper progress towards the goals and targets, in particular means of implementation.  Furthermore, little information is provided regarding the budgetary implications of the country-by-country review.  While Brazil acknowledges the importance of providing opportunities for exchanging experiences regarding the implementation of the Convention and the Post-2020 GBF, such exchanges could be made possible through flexible and informal modalities, such as side events during the sessions of SBI.  In light of the concerns presented, Brazil is still unconvinced of the added value of establishing a new “formal track” for review of implementation and requests the consideration of the document **CBD/SBI/3/11/ADD.5** to be postponed to the next COP. | |