

Template for submitting comments on the draft manual for Strengthening NBSAPs through Landscape Approaches (UNU)

Please submit comments by **26 May 2023** to the following email address: landscape_approaches_nbsaps@unu.edu (cc: secretariat@cbd.int)

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Please provide general comments on the draft manual below.	
<ul style="list-style-type: none"> - We suggest that the language could be stronger and more assertive of the need and crucial importance of landscape planning. For instance, “Actions toward GBF target 2 can integrate landscape approaches by...” could be rephrased as “Actions toward GBF target 2 should integrate landscape approaches by” - The rationale / added value & use of landscape approach is not sufficiently argued, only about the fact of contributing to conservation; - Also, we feel the document is too centered on conservation aspect, opposing conservation and development. GBF is also about restoration, sustainable land use, connectivity and some agro ecological practices can contribute to local biodiversity etc. - To achieve 100% of participatory landscape planning, we cannot just support specific biodiversity landscape planning focus on integrating results of landscape biodiversity plan in “geospatial planning”/ development plans”, we also and mostly need to integrate biodiversity in usual and other participatory land use planning approach which have long been used in ecosystem restoration approaches, watershed management, climate adaptation plans and community / local development plan; we shall more explicitly recognize such importance and clarify similarities and differences, and notably what can be added in such other approach ; there are no references to such different approaches although for instance the UN decade on restoration and UNCCD have been publishing guidelines on such topic - The approach does not specifically discuss how to integrate “future trend” including population change / urbanization and climate change which shall be also mainstreamed to optimize synergies and consider impacts of climate change when building such planning which is most often at least medium term - Language is difficult to penetrate (often vague, long sentences with many concepts and 	

not easily implementable – see example lines 153-156 and suggested rephrasing), and concepts are often repeated. We recommend making the document shorter and sentences more pragmatic and concise

- According to the document, landscape boundaries are purely designed to facilitate decision-making processes. While this is an important aspect, we recommend ecosystem flows are also accounted for when designing the boundaries of a landscape area. Otherwise, boundaries might be established to facilitate decision-making but ignore the high dependency of neighboring stakeholders on that landscape resource. In some cases, a group that is too large and too complex may still be required in order to account for the ecosystem flows and services, and further facilitation efforts and resources would be required, rather than reducing the landscape boundaries (see for example comments line 82-83 and box line 189)
- There is no or very little explicit mention of gender and recognition of socio economic differences, including in terms of land ownership, livelihoods, age etc. Women’s land use may differ from that of men, and land degradation affects women disproportionately/their reliance on land resources may be higher. This applies throughout the document, but particularly in boxes on identifying landscape and stakeholders, planning, mapping etc
- To be a guideline, the document shall refer to existing tools and online mapping tools as well how to actually implement
- The planning and monitoring does not include actual biodiversity indicator (reviewing population species, diversity of ecosystem etc.) which can be modelled (eg. through abc map online tool) or also measured etc.
- In terms of the overall tone of the narrative, the landscape approach comes across as very top-down, and local stakeholder engagement is not emphasized enough.
- While the recognition of Indigenous Peoples' land rights is mentioned in the document, the integration of recognizing land rights as part of conservation practice is lacking. The integration of IPs and LCs rights throughout different targets of the GBF is a reflection of a changing paradigm surrounding conservation that recognizes the critical role IPs and LCs play as custodians of ecosystems. This recognition is not reflected in the paper, where these rights are more mentioned as ‘check boxes’ that need to be verified. Relevant rights related indicators are also not included in the table.
- In relation to the above, more emphasis should be placed on recognizing Indigenous Peoples and Local Communities’ knowledge and practices as valuable contributions to landscape wide conservation planning.

Please provide other comments indicating the line number below.

Line number	Comments
29-30	The current definition of landscape approaches focuses on integrating uses and users. In addition to the “use” aspect of landscapes, we suggest emphasizing the interconnectedness and interdependencies of different elements in a landscape, in particular the interdependencies of the ecosystems and species it hosts, hence the importance of reconciling different users.
31	We suggest that this is not just “in the context of biodiversity conservation in national contexts” as landscape approaches are relevant beyond conservation. We suggest replacing to “in the context of biodiversity conservation, restoration and/or use”.
79	Suggest adding the word “ interdependent ” ecosystems and land and sea uses

81	Suggest adding the word interactions and “uses”
82-83	Suggest adding an ecological aspect to the definition of boundaries, to ensure administrative concerns do not trump ecological functions and services provided by ecosystems
108	Suggest expanding beyond “conservation” as landscape approaches are also paramount to design sustainable use of biodiversity or restoration activities
158	We cannot just focus on landscape and integrate in spatial planning; we also rather need to see how to mainstream / integrate biodiversity consideration in spatial planning and we shall put some references / analysis of difference with other approach in spatial planning (for instance many tools exist in the ecosystem restoration or watershed planning etc.)
171	Suggest specifying “decision-making” processes, not only implementation. Representation of IPLC who use and safeguard the land at decision-making level is crucial to ensure they are not bound to implement decisions that have not accounted for their particular status, and to ensure they can reap the benefits of sustainable use according to the fair and equitable benefit sharing principles.
153-156	Suggest rephrasing: <i>“For instance, conservation efforts involve managing protected areas and other designated areas primarily for conservation purposes. Additionally, there are other measures that contribute to conservation, even if they are not primarily implemented for that purpose (i.e. “other effective area-based conservation measures (OECMs)”). These measures contribute to sustainable land-use, food production, etc.”</i>
Box line 189	While defining landscape boundaries on stakeholder group’s size and complexity is important, we also recommend to account for ecosystem flows and services provided by the landscape as well as the overall purpose/use of the landscape approach. Minimally watershed need to be included as determine several interconnectivity of flow etc. Otherwise, boundaries might be established to facilitate decision-making but ignore the high dependency of neighboring stakeholders on that landscape resources. In some cases, a group that is too large and too complex may still be required in order to account for the ecosystem flows and services, and further facilitation efforts and resources would be required, rather than reducing the landscape boundaries. This can also be crucial to development ecosystem based payment that rely on such flow of ecosystem services (i.e. IFAD-TNC water fund support in Kenya) Furthermore, beyond the size to facilitate decision making, we need to also articulate with the level used in “spatial planning “ which often also articulate with administrative boundaries, meanwhile expanding to consider the connected ecosystem; for instance, in Nepal. IFAD support communities with semi-watershed climate resilience plan that focus on communities while considering community services
Box on <i>convene</i> below line 189	Convene and objective is also a start of the process and selection of participants and size of covered area Also beyond convene, there has to be some reflection on who to convene and importance to represent the different stakeholders and socio-economic differences (including the need to represent women, youth Indigineous

	people/minorities etc.), often requiring both consultatinio and literature review; and then some governance system for the geospatial planning
Box on <i>Map</i> below line 189	Expand beyond conservation in “To integrate conservation considerations,” Need to point to several existing tool that facilitate initial mapping of biodiversity element(abc map, starr etc.) and need to combine both GIS tool and participatory land mapping
Box on <i>Plan</i>	We recommend adding: <ul style="list-style-type: none"> - Development on incentives – so that all stakeholders are incentivized to manage the plan - Development of Grievance Redress Mechanisms in cases where landscape management requires compromises
Box monitor	Nothing to monitor area being better conserved (including OECM) and under restoration; also corridors – connectivity Nothing on tracking some level of actual biodiversity impacts Need to disaggregate stakeholder participation along socio-economic element, including gender Beyond BD spatially explicit map, they need to include such key results in other sectoral / development plan if not there wont be any impacts Also on potential resource mobilized – job generated et
207	We suggest that consultations also take place at regional levels, which often occurs for other strategies, so that it facilitates inclusivity and representation, in particular of IPLC.
210	We recommend including local government representatives in the first list of bullet points. Their presence in the process is crucial to ensure representation and coordination at national level of varying land uses, and also to facilitate the development of local BSAPs, which will be made easier if they are integrated in consultations at national level
250	Suggested additional indicator for target 1: number of geospatial mapping tools available to local and national governments to support decision-making > As these tools are critical to help landscape planning
Target 8	We recommend the green is darker. NbS are becoming a key approach for climate mitigation and adaptation, and they involve heavy use of natural resources which should be decided at landscape level to ensure minimum disruption to other users. In addition, many climate mitigation actions require large infrastructure, such as solar panel fields or desalination plants, which can also heavily disrupt the users and ecosystem services provided by the landscape
Target 11	We recommend the green is darker, because as said in the text ” Almost all land and sea users in almost all types of land and sea use, benefit from ecosystem services.”
Target 22	We recommend adding an indicator: number of IPLC organization or representatives consulted/included in landscape planning process. AND/OR number of landscape planning processes that have been reviewed or informed by IPLC organization or representatives. Relevant tenure indicators (including the ones integrated in the draft monitoring framework) should also be added.

