

**Response of the Campaign for Nature to the Convention on Biological Diversity’s
“Invitation for views on the preparation, scope and content of the post-2020 global
biodiversity framework”**

14 December, 2018

Dear Convention on Biological Diversity Secretariat:

Thank you for the opportunity to submit comments regarding (1) *the scientific underpinning of the scale and scope of actions necessary to make progress towards the 2050 Vision*; and (2) *views on the scope and content of the resource mobilization component of the post-2020 biodiversity framework*. Following are the Campaign for Nature’s comments:

(1) The scientific underpinning of the scale and scope of actions necessary to make progress towards the 2050 Vision:

Biodiversity loss, increasing in severity, deserves more attention than ever before. Scientists agree that the problem is manifest in a major extinction crisis, one unlike any in the history of the planet as it is happening within decades instead of millennia and as the direct result of human impact on the planet.¹ The current rate of global species loss is estimated to be up to 1,000 times higher than the naturally occurring extinction rate and is expected to rise even higher.²

Without major global conservation action, scientists predict that huge numbers of species will be on the path to extinction by the middle of the century.³ This will threaten the wellbeing of humanity — indeed, we are already witnessing startling impacts in the loss of the animal populations,⁴ intact forests,⁵ and fisheries we depend on.⁶

While a number of factors contribute to species extinction, habitat loss is the current leading cause.⁷ As a result, when leaders come together through the Convention on Biological Diversity

¹ Williams, Mark, et al. “The Anthropocene Biosphere.” *Sage Journals*, vol. 2, no. 3, 18 June 2015, pp. 196–219., journals.sagepub.com/doi/10.1177/2053019615591020.

² De Vos, Jurriaan M., et al. “Estimating the Normal Background Rate of Species Extinction.” *Conservation Biology*, vol. 29, no. 2, 26 Aug. 2014, pp. 452–462., doi:10.1111/cobi.12380.

³ “Summary Statistics.” *The IUCN Red List of Threatened Species*, IUCN, www.iucnredlist.org/about/summary-statistics.

⁴ Living Planet Report 2016. WWF International, 2016, *Living Planet Report 2016*, awsassets.panda.org/downloads/lpr_living_planet_report_2016.pdf.

⁵ Erickson-Davis, Morgan. “‘We Need to Act’: Scientists Urge Prioritization of Intact Forests.” *Conservation News*, Mongabay, 26 Feb. 2018, news.mongabay.com/2018/02/huge-gamble-scientists-urge-prioritization-of-intact-forests/.

⁶ Worm, Boris, et al. “Impacts of Biodiversity Loss on Ocean Ecosystem Services.” *Science*, American Association for the Advancement of Science, 3 Nov. 2006, science.sciencemag.org/content/314/5800/787?ijkey=a22199a0d10e8ba572c7812ebb220f7a6da1a442&keytype=tf_ipsecsha.

⁷ Chivian, Eric, and Aaron Bernstein. *How Our Health Depends on Biodiversity*. Harvard University Center for Health and the Global Environment, 2010,

(CBD), among the most important tools at their disposal is the designation and management of parks and protected areas. As the CBD states,⁸ “protected areas are the cornerstone of biological diversity conservation.”

Because of the importance of protected areas, the Campaign for Nature’s comments focus specifically on modifying or replacing the current Aichi Target 11, which calls for 17 percent protection for terrestrial areas and 10 percent for coastal and marine areas.⁹ With the proliferation of additional scientific evidence and the worsening of the biodiversity crisis, scientists now recognize that Target 11 is far too low to effectively conserve biodiversity and that protected area coverage must increase substantially.¹⁰

Many scientists have united around the call for at least 30% of our oceans and land protected by 2030 — a “30 by 30” target for both land and sea — and then plan to aim to secure 50% by 2050. We stand with the scientific community in advocating for a stronger protected area target and outline the evidence for the necessity of a higher target, as well as specific scientific perspectives, below.

Scientific surveys show support for bold area-based targets: The International Union for the Conservation of Nature World Commission on Protected Areas’ Beyond the Aichi Targets Task Force¹¹ recently surveyed scientists from 81 countries to synthesize expertise on global conservation targets ahead of the upcoming CBD meetings. Findings provide strong support for protected areas and lend compelling evidence to the need for a dramatic increase in global targets for terrestrial and marine protection:¹²

- Scientists surveyed overwhelmingly agree on the importance of area-based conservation: over 90% replied that this is an “extremely important” component to biodiversity conservation.
- There is very strong support among scientists for the use of large area-based targets that call, for example, for a certain percentage of the globe to be protected. 78% agree or strongly agree with large area-based targets.
- There is overwhelming scientific agreement that the 17% and 10% figures in Target 11 are insufficient to halt biodiversity loss. About 75% of scientists stated that the current targets are not high enough while many of the others simply said they did not know.
- Scientists felt that all elements of Target 11 are important to retain, with “areas of importance to biodiversity” and “connectivity” considered the most important.

www.bu.edu/sph/files/2012/12/Chivian_and_Bernstein_2010_How_our_Health_Depends_on_Biodiversity.pdf.

⁸ *Protected Areas – an Overview*. Convention on Biological Diversity, www.cbd.int/protected/overview/.

⁹ “Aichi Biodiversity Targets.” *Convention on Biological Diversity Secretariat*, <https://www.cbd.int/Sp/Targets/>, www.cbd.int/sp/targets/.

¹⁰ “The Promise of Sydney.” *IUCN*, 17 Oct. 2017, www.iucn.org/theme/protected-areas/about/promise-sydney.

¹¹ *Beyond the Aichi Targets*. IUCN, 6 June 2018, www.iucn.org/theme/protected-areas/wcpa/what-we-do/beyond-aichi-targets.

¹² Locke, Harvey. “IUCN WCPA Beyond the Aichi Targets Task Force Report.” Beyond Aichi Targets Task Force. Unpublished presentation.

- There is broad agreement that a range of existing approaches can be used to define numerical area targets for in-situ conservation, such as population viability analyses, species area curves, modeling, systematic regional conservation planning, etc.
- There is strong agreement that targets should be evidence-based, rather than arbitrary, and measurable.

Support exists in scientific literature: One paper analyzing a variety of studies and reviews concluded that 25-75% of a typical region must be managed for conservation in order to meet biodiversity conservation goals. The study notes: “from a strictly scientific point of view, the only defensible targets are those derived from empirical data and rigorous analyses.” Assessing a variety of estimates of how much coverage is enough and then picking the midpoint of those estimates would be a scientifically justifiable choice — doing so would arrive at about 50%.¹³

A recent comprehensive literature review assessed 144 studies related to marine protected areas in order to determine the total theoretical percentage of the ocean needed to achieve conservation-related goals, including biodiversity protection, and found an average of 37%. The authors stress that this is not an explicit recommendation for what global targets should be but rather offer a perspective on political targets — that Aichi Target 11’s marine 10% target is only a waypoint toward effective ocean protection, not an endpoint.¹⁴

Scientists James Watson and Oscar Venter have demonstrated that conserving large areas is compatible with humanity’s ability to continue developing in certain regions. They provide a simple plan for how to conserve half the planet for nature while satisfying global development and agricultural needs. Limiting the space needed for agricultural production through technology and increasing yields could provide dual benefits by both freeing up space to meet habitat needs and enhancing local livelihoods.¹⁵

Wide-ranging scientific calls for significantly increased protected area targets: Scientists catalyzed a global movement to protect half of the planet, most often known as Nature Needs Half¹⁶ or as Half Earth,¹⁷ which has begun to push for turning the scientific evidence for increased conservation action into substantive progress. Other scientists call for an initiative known as the Global Deal for Nature, which would involve an enhanced international commitment to biodiversity conservation at a scale on par with the Paris Climate Deal.¹⁸ The call to act is based on a simple fact — that “scientists agree that we can enhance global ecosystem recovery by designating half of Earth’s land and seas as connected networks of protected areas,

¹³ Noss, Reed F., et al. “Bolder Thinking for Conservation.” *The Canadian Journal of Chemical Engineering*, Wiley-Blackwell, 26 Jan. 2012, onlinelibrary.wiley.com/doi/full/10.1111/j.1523-1739.2011.01738.x.

¹⁴ O’Leary, Bethan C., et al. “Effective Coverage Targets for Ocean Protection.” *Conservation Letters*, Wiley/Blackwell, 21 Apr. 2016, onlinelibrary.wiley.com/doi/full/10.1111/conl.12247.

¹⁵ Watson, James E. M., and Oscar Venter. “A Global Plan for Nature Conservation.” *Nature*, vol. 550, 5 Oct. 2017.

¹⁶ Nature Needs Half, natureneedshalf.org/.

¹⁷ Half-Earth Project. EO Wilson Biodiversity Foundation, 2017, eowilsonfoundation.org/half-earth-project/.

¹⁸ Dinerstein, Eric, et al. “Ecoregion-Based Approach to Protecting Half the Terrestrial Realm.” *OUP Academic*, Oxford University Press, 5 Apr. 2017, doi.org/10.1093/biosci/bix014.

to enable the recovery of Earth's biodiversity and the preservation of indigenous communities rights worldwide who are stewards of much of the world's biodiversity."¹⁹ Most agree that a strong near-term step in that direction is a commitment by nations to adopt a 30% protected area target by 2030.

Given the scale of the biodiversity crisis, an immediate, bold commitment and investment in protected areas is needed. It is clear that an international groundswell is building around the 2020 CBD COP in Beijing, setting the stage for a substantial increase in the world's commitment to the protection of biodiversity. We therefore encourage the adoption of a goal of increasing protected area targets to at least 30% by 2030 with a long-term goal of 50% protection. This would represent a step forward at the scale necessary to address the crisis at hand.²⁰

A central role for indigenous conservation. We strongly believe that indigenous land conservation and the respect of indigenous rights must be central to any Global Deal for Nature. Human rights must be at the center of conservation, an essential point that is made even more important by the fact that much of the world's biodiversity resides on indigenous lands. Indigenous leadership in crafting such a deal for nature, uniting traditional and scientific knowledge, is the best way to save life on Earth.

As a result, we believe that it is imperative to actively and continuously seek input and engagement from indigenous communities around the world during regional workshops, conferences, technical meetings, and any other aspects of the convention's process leading up to and through COP15 in Beijing.

Additionally, we believe that the content of any Global Deal for Nature should not only be shaped by indigenous input, but that it should explicitly reference and respect the role of indigenous land in safeguarding biodiversity and achieving new, ambitious targets. In the context of Target 11, we believe that means that not only in the implementing language but in the language of the target itself, it should be made explicit that indigenous protected areas or otherwise conserved lands contribute towards the overall percentage goal.

Building on all aspects of Target 11. Target 11 calls for conserving more places: "especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes." The most recent Protected Planet Report shows that progress in every one of these areas is needed to achieve Target 11. As a result, this language must be strengthened and a renewed focus must be placed on implementation to ensure that these same goals related to quality, representativity, intactness, connectivity, and high biodiversity value are met in the context of a more ambitious protected area target.

¹⁹ Dinerstein, Eric. Global Deal for Nature – RESOLVE. RESOLVE, 14 Apr. 2017, www.resolve.org/blog/2017/global-deal-for-nature-2.

²⁰ Watson, James E. M., and Oscar Venter. "A Global Plan for Nature Conservation." *Nature*, vol. 550, 5 Oct. 2017.

Incorporating Other Effective Area-Based Conservation Measures (OECMs) in area-based targets. OECMs can supplement protected areas and help deliver greater ecological representativeness and improve connectivity across protected area systems. A successful post-2020 plan will require more emphasis on a broader range of protected and conserved areas under different governance and management regimes in terrestrial, marine and freshwater ecosystems. OECMs also provide an opportunity to recognize and engage a broader range of stakeholders and partners in conservation management. For all of these reasons, we strongly support promoting OECMs and including them alongside protected areas in measuring progress towards Target 11 and a revised area-based target.

Prioritizing the conservation of high-biodiversity areas: Because comprehensive biodiversity protection is the goal, it is imperative that the post-2020 plan focuses on those areas most important for biodiversity. These include areas with the highest species richness, Key Biodiversity Areas, Ecologically or Biologically Significant Areas, intact ecosystems, and places with intact ecosystem services — including climate mitigation through carbon sequestration.

A potential framework for protected area targets in different conditions of the planet. We believe that it is important to clarify that a protected area target is a global target and not necessarily a figure that all countries are expected to meet within the context of their own lands and waters. That said, we believe that every country has a significant role to play in meeting any global target. To help demonstrate these points, we believe that there is strong value in promoting *The Three Conditions Framework*, which is designed to enable ambitious action to protect global biodiversity while recognizing that different parties have different conditions and responsibilities. In accordance with Principle 7 of the Rio Declaration, this framework calls for simultaneous action by all countries across all Three Conditions as part of the requirement for common but differentiated responsibility to protect Earth's ecosystem.

The Three Global Conditions for Biodiversity Conservation and Restoration are:

1. *The highly populated, agriculturally fertile, and developed areas:* The target in this condition is to preserve all the remaining remnants of an ecoregion, rather than numerical targets. Focus on protecting identified endangered species and ecosystems, active ecological restoration, restoring connectivity, and on ecological processes that are impaired. Area-based conservation must be mainstreamed with appropriate spatial planning and sustainable production and sustainable consumption, maintaining pollinators, reducing nitrogen inputs and providing access to nature. Different sub-strategies are needed for urban and intensive agricultural areas.
2. *Open landscapes with lower human population densities and grazing, fishing and some resource extraction and with large existing or potential protected and conserved areas:* The target for this condition is to develop systems of protected and conserved areas in an ecologically connected way, consistent with Aichi Target 11's current language of "ecologically representative and well-connected systems of protected areas and OECMs... integrated into the wider landscape and seascape." The system should target both areas of ecological representation and areas of particular importance for biodiversity and aim to conserve all existing native species and supporting ecological processes and ensure that the protected areas are effectively managed. Ecological restoration is also

important in this condition, especially for connectivity and large-ranging mammals. An ambitious percentage target is appropriate in this condition.

3. *Large areas with a high level of ecosystem integrity (wilderness), with low population densities or no humans:* The targets for this condition are to protect and conserve the entire natural system as it is now (not a percentage), linear infrastructure such as roads should be minimized, and industrial development should be an exception and subject to the mitigation hierarchy. Indigenous people and communities' governance systems are of major importance in these areas. The ecological aim is to maintain intactness and a very low human footprint in order to maintain all native species and ecological processes. In addition to *in-situ* biodiversity conservation goals, this condition protects global- scale ecological processes including carbon sequestration, regional hydrology, and large-scale meteorological patterns.

Area-based targets are just one piece of a comprehensive strategy. There is a widespread understanding that the percentage target for area-based conservation within Target 11 has been useful for driving tangible conservation action across the globe. However, it is of paramount importance to emphasize that this is only one of many components necessary to save biodiversity and achieve CBD's 2050 vision. There is widespread agreement that there are many other critically important aspects of a post-2020 plan. Many of these are outlined in a consensus document that the Campaign for Nature recently signed onto along with Birdlife International, Conservation International, Fauna and Flora International, Global Wildlife Conservation, the National Geographic Society, Natural Resources Defense Council, The Nature Conservancy, Pew Charitable Trusts, Panthera, the United National Foundation, Wildlife Conservation Society, WWF, and the Zoological Society of London.

Some additional ideas that the coalition put forth as key components of a post-2020 plan include:

- Ensuring effective and sustainable management of protected areas;
- Preventing extinctions and reversing the decline of species populations;
- Stabilizing or increasing natural ecosystems and habitats and their services – while restoring degraded lands;
- Including headline targets that are simple, easy to measure and will resonate with the public; and
- Ensuring targets are based on those in the Aichi framework but that all targets must be measurable and have available indicators.

(2) views on the scope and content of the resource mobilization component of the post-2020 biodiversity framework:

Considering the major shortfalls in current biodiversity conservation spending,²¹ resource mobilization should be a central component of CBD's post-2020 strategy.

²¹ McCarthy, Donal P., et al. "Financial Costs of Meeting Global Biodiversity Conservation Targets: Current Spending and Unmet Needs." *Science*, vol. 338, no. 946, 4 Oct. 2012, science.sciencemag.org/content/338/6109/946.

Many cite ~\$50 billion as the current level of biodiversity spending,²² but we believe that the actual amount differs substantially and that a more accurate and up-to-date figure is needed. As a result, the Campaign for Nature is currently helping fund research to help leaders understand the current state of biodiversity funding and inform their decision-making process. This research focuses specifically on the increased conservation target of protecting 30 percent of the planet by 2030.

Below, we outline the details of this research with the hopes that the study, set to be completed before the 2020 COP, substantively informs the discussion and helps countries reach the goals set at that meeting. We are expecting this work to fit within a greater effort establishing the cost of reaching other conservation targets since the 30 by 30 target and the funding required are only one piece of the post-2020 plan.

We are starting with two overarching questions. The first is (a): What is the cost of achieving the 30 by 30 goal (i.e. the budget need)? This leads directly to a second, critical policy question: (b) What increase in budget is implied if we accept the 30 by 30 initiative?"

One of the strongest arguments for "30 by 30" would potentially be that the land and water is worth more if it is protected than if it is put into production. This raises a third question: (c) How does the economic value of protecting the 30% compare to the "productive" economic value of the land/water?

We address these three questions in more detail below.

(a) The cost of achieving 30% by 2030

There are three basic costs: (1) purchasing or designating the land and water; (2) putting in place the basic infrastructure of protection; (3) the annual running costs of a protected area. The study will collate global GIS data and use existing algorithms to estimate all of these.²³

Since the 30% could eventually be placed in many different parts of the map, we will derive costs for several different scenarios: (1) the 30% of the planet that maximizes the number of species protected; (2) 30% of each ecoregion (maximizing the number of species protected within each ecoregion); (3) a repeatedly randomized 30% of each ecoregion. This will give a general sense of the range of costs.

(b) The budget increase needed to achieve 30% by 2030

²² *The Little Biodiversity Finance Book - 3rd Edition (2012)*. Global Canopy Programme, 2012, www.globalcanopy.org/publications/little-biodiversity-finance-book-3rd-edition-2012.

²³ NB this exercise focuses on the budgets needed to establish and maintain additional protected areas. It therefore ignores the opportunity costs of taking land and water out of production. Nevertheless, opportunity costs would be included in part (c), which measures the net economic benefit or loss from the creation of new protected areas.

The budget increase needed for 30 By 30 is the difference between the cost of the goal and the current amount spent. Surprisingly, the level of current spending on protected areas remains unknown. The new research needed for component (b), therefore, is to estimate current PA spending (component (a) has already calculated the new budget against which this is compared).

We have already collated data on the budgets for 2,000 protected areas (from their management reports). We propose to link these 2,000 known budgets to global data on the management factors likely to influence them. This will generate a statistical model that can be used to estimate the unknown budgets. This follows a published procedure, in Proceedings of the National Academy of Sciences.²⁴ Adding the known and estimated budgets together will then give *current total spending on protected areas worldwide* (with a quantified range of error).

There is clearly some uncertainty involved in a statistical estimate. In addition, therefore, we have thousands of financial reports from donors and governments, all detailing funding to conservation at the country level. We can therefore analyze this country-level spending data to generate an alternative estimate of current PA funding.

By combining the statistical model results and the country-level spending reports, we believe that a reasonable estimate of current spending on protected areas can be calculated. We could then give policymakers a sense of the budget *increase* needed to achieve 30 by 30.

(c) The economic value of protecting 30% of the earth, rather than putting it into production

The economic value of land and water that has been protected is mostly captured by its “ecosystem service value”, which includes multiple aspects such as (but not restricted to) water purification, tourism and enjoyment, carbon sequestration (i.e. climate change mitigation), and flood defence.²⁵ The economic value that the land or water would have if exploited (rather than protected) is generally related to what could be produced or extracted. For terrestrial protected areas, the value of production is largely captured in the term “agricultural rent” (which quantifies the annual income that one would expect to achieve if the land was converted to the most profitable crop and the timber taken out). For marine and coastal PAs, the main production value is generally the fisheries catch.

Recently developed methods and data exist to calculate ecosystem service value, agricultural rent and fisheries value of protected areas.^{26 27} These can now be updated with new information on

²⁴ Waldron, Anthony, et al. “Targeting Global Conservation Funding to Limit Immediate Biodiversity Declines.” *Proceedings of the National Academy of Sciences*, vol. 110, no. 29, 13 May 2013, www.pnas.org/content/110/29/12144.full.

²⁵ There are other values, such as cultural importance, which are harder to capture economically and are therefore typically omitted from economic valuation of nature.

²⁶ Carrasco, L.R., Nghiem, T.P.L., Sunderland, T. & Koh, L.P. (2014) Economic valuation of ecosystem services fails to capture biodiversity value of tropical forests. *Biological Conservation*, **178**, 163–170.

²⁷ Brander, L., Baulcomb, C., van der Lelij, J., Eppink, F., McVittie, A., Nijsten, L. & van Beukering, P. (2015) *The Benefits to People of Expanding Marine Protected Areas*.

global fisheries catch.²⁸ As with part (1), the relative values of “protected” versus “productive” land will depend on where the additional protected areas to make up the 30% are located. To address this uncertainty, we will take the same approaches as in component (a) i.e. calculating competing values for multiple scenarios of where the PAs may be situated.

(d) The sources of additional funding

Our research will provide insight into the magnitude of funding necessary to reach a 30 by 30 goal and the economic justification for providing the funding. The next topic, which must also be addressed through the CBD, is from where the new sources of funding will come. The CBD process must:

- **identify** funding sources to meet this gap, likely coming from a combination of external sources and domestic sources;
- help decision-makers **prioritize** the sources of funding to generate and pursue, and;
- **generate commitments** to procuring the necessary levels of funding.

We intend to launch a study in addition to the one outlined above, which is in the process of being defined, to explore options for sources of new funding. We expect increased funding will be required from a range of potential sources, including:

- Domestic governments
- Bilateral aid and multilateral funding
- Foundations
- Individual philanthropy, from billionaires to small donors
- Corporations
- Market sources, including fees, offsets, bio-prospecting, green commodities, agriculture reform, and payments for ecosystem services

We will also work with existing efforts, including BIOFIN, to pursue increased financial flows to conservation from this wide range of sources.

(e) The spending of additional funding

It must be noted that, in addition to a funding problem — a lack of overall investment in biodiversity, which will be addressed in the study mentioned above — we face a spending problem when it comes to nature. Existing funding in too many cases does not get spent in the right places.

Despite being the fundamental unit of conservation, only about a third of conservation spending is dedicated to protected areas, according to our research. The rest is allocated to projects outside

²⁸ *EcoMarRes*, ecomarres.com/?page_id=945.

of protected areas, including a wide range of environmental, agricultural, community, and development programs.^{29 30}

Furthermore, our research indicates only about 13% of total spending on protected areas occurs in developing countries. This represents just 5% of total conservation spending.³¹ With Earth's highest biodiversity areas existing mostly in developing countries, these figures show the necessity of a shift in where conservation money is spent.

We propose two improvements in spending that could mitigate this problem: (1) provide additional funding for biodiversity to the Global Environment Facility (GEF), which could serve as a vehicle for better distributing conservation funding, and (2) create additional, new, improved funding mechanisms that can attract public and, importantly, private capital.

The GEF has so far been a champion of biodiversity, perhaps most notably through its funding of place based conservation — its creation and management of protected areas and their associated buffer zones and biological corridors. As a neutral international body working to support biodiversity conservation throughout the globe, the GEF could provide a smart focus for any effort to ratchet up funding through the CBD.

In addition to spending more on the organizations that are known to fund effective conservation, securing the world's biodiversity requires bold new strategies both in terms of scope and financing. The CBD process should identify steps for creating and implementing these funding mechanisms.

Indeed, this need for new funding mechanisms is echoed by the GEF in their recent document outlining the GEF biodiversity strategy:

"GEF has been investing in improving financial sustainability of protected area systems for the past decade, but system-wide funding gaps remain at the national level in many GEF-eligible countries that have received GEF support. Restricted government budgets in many countries have reduced the financial support for protected area management and many are chronically underfunded and understaffed. Thus, new financing strategies for protected area systems are critical to reduce existing funding gaps and improve management."³²

Any new mechanism should feature three core aspects:

²⁹ Waldron, Anthony, et al. "Targeting Global Conservation Funding to Limit Immediate Biodiversity Declines." *Proceedings of the National Academy of Sciences*, vol. 110, no. 29, 13 May 2013, www.pnas.org/content/110/29/12144.full.

³⁰ James, Alexander, et al. "Can We Afford to Conserve Biodiversity?" *OUP Academic*, vol. 51, no. 1, www.academic.oup.com/bioscience/article/51/1/43/251867.

³¹ James, Alexander, et al. "Can We Afford to Conserve Biodiversity?" *OUP Academic*, vol. 51, no. 1, www.academic.oup.com/bioscience/article/51/1/43/251867.

³² *GEF-7 Biodiversity Strategy*. Global Environment Facility, Nov. 2018, www.thegef.org/sites/default/files/publications/GEF_BiodiversityStrategy%202018_CRA_b11.pdf.

1. A **place-based** focus on protected areas, especially ones of high biodiversity, in parks systems that are resilient to climate change, ecologically representative, and at sufficient scale
2. A **long-term** financial commitment (20+ years) to the management of specific protected areas
3. Institutional capacity and **accountability** of NGOs and governments to measured conservation outcomes based on key performance indicators

We further outline these three core aspects below.

1. A **place-based** focus on protected areas, especially ones of high biodiversity, in parks systems that are resilient to climate change, ecologically representative, and at sufficient scale

This pillar echoes the current Target 11 in its call to focus on place-based protection as the core of the conservation strategy, determined by the best available science. Simply meeting the needs of a specific protected area is first and foremost.

2. A **long-term** financial commitment (20+ years) to the management of specific protected areas

A central problem with our current approach to conservation spending is that the vast majority of parks and protected areas lack long-term funding, which severely limits the capacity for effective management and monitoring, jeopardizing their mission of safeguarding biodiversity. Many areas are facing serious threats including illegal logging, mining, invasive species, poaching, and encroaching development.

In recognition of the need for more long-term conservation funding, a number of new funding approaches have emerged, including an increasingly diverse array of conservation trust funds. However, none are currently capitalized at a sufficient level to close large funding gaps, and there is limited information about whether and how these and other mechanisms are improving conservation outcomes. To date, no single approach has emerged as a successful and scalable model for addressing the protected area funding shortfall.

Achieving long-term funding needs a new model, possibly through a permanent endowment, a sinking fund, or a long-term pledge of annual support (it is also possible to combine these approaches for a particular protected area). The model should feature a single closing for each area fund to provide certainty to donors that the full required amount will be funded, a method that has been used successfully in the Project Finance for Permanence efforts in Costa Rica and Brazil. It should also provide for coordination among donors and a streamlined relationship between donors and recipients.

3. Institutional capacity and **accountability** of governments and NGOs to generate measured conservation outcomes based on key performance indicators

Key to the new approach should be a long-term commitment to an individual protected area by an entity responsible for achieving measured biodiversity conservation outcomes. In turn, the managing entity would receive reliable, long-term funding for the area, distributed if it consistently meets key performance indicators. This approach could include governments, NGOs

or other entities either managing or co-managing an area. The model should identify a set of Key Performance Indicators that are applicable across protected areas (e.g. species counts, forest cover). KPIs will be tailored to specific areas and agreed upon by donors and recipients at the outset of the funding commitment. A key element of any model should be that funding is contingent on outcomes.

Regardless of the eventual structure, new funding mechanisms are essential to meet the dramatic increase in funding and shift in spending necessary to adequately protect biodiversity. Therefore, in addition to funding existing effective conservation organizations such as the GEF, new funding mechanisms should be central to CBD's post-2020 strategy.

Thank you for the opportunity to provide comments on the scope and content of the post-2020 global biodiversity framework.

Sincerely,

Brian O'Donnell
Director
Campaign for Nature