Friends of the Earth International

Submission
on the post-2020 Framework

Summary

The CBD's Post 2020 Framework needs to:

1. Ensure planetary boundaries are not exceeded. Voluntary contributions are not sufficient for this.
2. Build on the Aichi targets and ensure continuation of implementation.
3. Over and above the existing targets:

    - Halt the drivers of biodiversity loss and ensure regulation is in place to do so
    - Monitor investment that is harmful for biodiversity and set up plans to stop it
    - Give full cooperation and enhance the role of Indigenous peoples and local communities, who are proven to be the best guardians for biodiversity
    - Increase biodiversity in areas where humans live

4. Include strong and effective implementation and compliance mechanisms.
5. Real system change will be needed. There is no unlimited growth on a limited planet, and corporations need to be harnessed.

1) Introduction

The present paper responds to CBD notification ntf-2018-063 Invitation for initial views on the preparation, scope and content of the post-2020 global biodiversity framework on behalf of Friends of the Earth International. FOEI is the world's largest grassroots environmental network, uniting 75 national member groups and some 5,000 local activist groups on every continent and over 2 million members and supporters around the world. We are happy to provide our initial views based on our experience from the ground on the important issue of the world's post 2020 framework for biodiversity.

2) Analysing the Reasons for non-implementation of the current strategic plan

"Those who fail to learn from history are condemned to repeat it."
(Winston Churchill)

It is impossible to do things different in the future if we don't analyse why the current strategic plan has not been able to achieve the mission of halting biodiversity loss.

Trust needs to be rebuild. Due to the current state of non-implementation of the Aichi targets, policy makers and the general public start from the perception that the new ones will not change anything significantly either. It needs a very conscious handling to change this perception and to rebuild trust.

It is therefore of key importance to do a thorough analysis of the reasons for non-implementation. This analysis needs to look at the different steps and interfaces where the strategic plan is transferred to the next level: from the CBD level to the national biodiversity strategy, form the strategy to an action plan, from the environment ministry to sectoral ministries, from plans to what is happening on the ground. Each interface must be looked when doing the analysis which serves as basis for improvements. It also needs to look at social, political and psychological aspects.

However, we expect it to confirm the analysis the NGO Major group presented at this year's High Level Political Forum of the Agenda 2030 on why the biodiversity targets were not reached:
"Primary obstacles to the implementation of SDG 15 are (1) lack of political will; (2) an inability to address root causes, including an economic model relying on unlimited growth; (3) insufficient reflection of the values of geodiversity, biodiversity and ecosystem services in the economy and public decision-making processes; and (4) corporate control and power, particularly in agricultural, forestry, fishery, munitions, hunting and outfitters industries."

Quite clearly, the main gap is not within the targets themselves, but with their implementation.

3) The ambition level for the post-2020 global biodiversity framework

The responsibility upon the CBD for the next decade is to ensure that the world will stay within the planetary boundaries. Any level of ambition that cannot guarantee a safe operating space for humanity would fail the objectives of the convention. Therefore, the level of ambition must be not only to halt biodiversity loss, but to aim at recovery to a level where populations not only merely just survive, but reach a good (conservation) status so that their resilience and long-term existence is assured.

4) Scope of the post-2020 global biodiversity framework

Like its predecessor, the post 2020 strategic plan needs to facilitate the implementation of the three goals of the convention: conservation, sustainable use and access and benefit sharing. It also is the key instrument to reach the 2050 vision of "Living in harmony with nature" where "by 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people", which has been reaffirmed by COP 14 (CBD/COP/14/L.30). As it is highly unlikely that the Aichi targets and the CBD strategic plan's mission will be reached by their expiry date in 2020, the new strategy needs to ensure continuation of this work towards the goals by taking effective and urgent action to halt the loss of biodiversity. This needs to be done both by the CBD itself - where related to its agreed goals - as well as in conjunction with other international agreements for more fundamental and wider issues that are not directly biodiversity related, but have strong bearing on biodiversity (see section 7).

5) Elements of the framework

1. Mission

The present mission unfortunately still is as pertinent as was in 2010 and in 2001 when the CBD first decided to halt the loss of biodiversity. However, as biodiversity loss has proceeded unabatedly in the meantime, it will be also increasingly necessary also to let ecosystems recover until they have reached a favourable conservation status, and this could be highlighted in the new mission. Also, FoEI suggests to extend the timeline for the new mission to 2035 in order to ensure continuity and coherence between SDGs 14 and 15 and the new strategic plan.

2. Principles

The post-2020 strategy could be accompanied by a limited number of overarching key principles, like in the agenda 2030. This will mainly draw on already agreed principles such as the Rio principles, but may also need to include new ones. For our proposed principles, see section 7.

3. Linkages between the post 2020 framework and the current plan, the protocols of the convention and other instruments and fora

The post 2020 framework should guarantee continuity with the current one, and should also fully integrate the Protocols of the convention.

As already mentioned under “scope”, many issues that have a big influence on biodiversity are treated in other international fora involving other sectors. It is important to highlight the linkages and take influence on / make recommendations to these processes as well.

More explanation on these elements in section 7.

4. Targets

The Aichi targets have fostered action, created focus and increased measurability. It is clear that at the heart of the post-2020 there must be a set of targets that builds on, and continues the role, of the Aichi targets (see next section), also for the sake of coherence with SDG 15. Each of the new targets should be accompanied by an implementation plan that contains a rationale, as set of actions to be undertaken and milestones that enable tracking their implementation.

More information on the targets in section 8.

5. Elements that can help implementation

Analysis shows that the main reason for not achieving the current strategic plan has not been the content of the Aichi targets but the **lack of implementation**. Next to a robust system of mission, targets and principles which tell us where to go (and how), the single most important issue is to strengthen implementation through a set of institutional changes and measures.

These aspects are worked out in section 9.

6. Resource mobilization and finance

Sufficient finance is important for the implementation of measures. In the period 2010-2020, many developed country parties have not fulfilled their obligations of doubling the biodiversity related international finance flows, and lack of financial resources. We suggest that this be raised according to the needs identified in Decision CBD/COP/14/L.33, para 15a-c.

6) Principles

The following principles need to be embedded in the targets, and need to be taken at heart in all phases of decision making and implementation of the next strategic plan:

- **Precautionary principle** which demands to take preventive action in the face of uncertainty. For environmental purposes this implies to act in protection of the environment, also in the absence of full proof that the developments and trends in question are deteriorating the environment. Any tendency that indicates these human developments may have a negative bearing on biodiversity needs to undergo a risk assessment and in case a negative impact on biodiversity cannot be excluded, need to be stopped or altered.

For new technologies, the precautionary principle implies the burden of proof of non-harmfulness) lies with the proponents of an activity and a wide range of alternatives to possibly harmful actions need to be explored.

- **Intergenerational justice perspective:** not putting the (economic) needs of current generations before needs and rights of future generations to a healthy environment
- **Human rights perspective:** ensuring that any measure to protect the environment does not harm human rights. Also recognising that by protecting the human rights of those who protect the environment, nature's interests are best preserved.
- **Indigenous peoples and local communities contributions and rights:** recognising the knowledge on how to live in harmony with nature, how to conserve and restore ecosystems including through human interaction, and that preserving the rights of those doing so contributes to nature conservation
- **Gender justice perspective:** Recognising the special role women have in preserving the environment and the special impact it has on them for them when the environment deteriorates. A gender perspective is not the same as making sure there is gender balance in decision making processes.
- **Equity and poverty reduction:** environmental problems are to a big extent the result of overuse of resources. In a limited world, there can be limited use of resources and these must be used in a fair and equitable way. This implies reducing for the rich and lifting the poor out of poverty.
- **Benefit sharing:** Indigenous Peoples and Local communities must receive the benefits from their capacity to preserve the environment, and from their knowledge on agro-, cultural and biological diversity. They may not be obliged to share any of their resources, consent needs to be given through a decent FPIC process. Though benefits can be economical, this may not lead to loss of autonomy over their resources.
- **Full participation by rights-holders:** In all decision-making processes as well as in the implementation processes, rights-holders need to be involved in a democratic way. Rights-holders are to be understood as those whose direct environment and wellbeing is being impacted by possible decisions, or the lack thereof. Also, those advocating for the common good, as understood in the objectives of the convention are to be understood as rights-holders.

  They need to be clearly distinguished from those stakeholders whose interest is related to private direct or indirect financial gain.

7) Linkages between the post 2020 framework and the current plan, the protocols of the convention and other instruments and fora

1. The relationship between the post-2020 global biodiversity framework and the current Strategic Plan

New targets for the post 2020 framework should build on, and enhance, the existing targets, and should be at least as strong as the existing Aichi targets. It is important that they are compatible with the existing targets to ensure continuity of implementation, for

comparability of progress and in order not to lose valuable time by turning global targets into national ones and defining the necessary actions.

It needs to be underlined that setting targets alone does not do the job. It is the **implementation** of the targets that will ensure a healthy planet. A stronger CBD and stronger ways and mechanisms for better implementation are key elements for the success of the new strategic plan.

2. The relationship between the Convention and its Protocols

The Convention and its Protocols are all essential to the post 2020 framework, and the targets should fully reflect the essence of the protocols.

3. The relationship between the post-2020 global biodiversity framework and other relevant processes

The post 2020 global biodiversity framework is, in terms of content, and needs to be, in political terms, closely **linked with other multinational agreements**, such as the Agenda 2030, the Climate convention (UNFCCC), the Convention on Desertification (UNCCD), and all other environment-related conventions and treaties

The CBD also needs to make strong recommendation towards other non-environmental processes, when these have impacts on biodiversity. These include economic processes, such as the World Trade Organisation (WTO), and the upcoming UN Treaty on transnational corporations and human rights. These also include biodiversity related aspects of conventions and processes that define hazardous products or processes.

The CBD's recommendations need to be respected and implemented by these and all other international agreements.

8) Targets

Friends of the Earth believes the post-2020 targets should ideally build on the existing Aichi targets. They should be enhanced or complemented where needed, and, in some cases additional targets will need to be set out. However, the new targets should be based on the previous ones in such a way that the continuity of instruments, including NBSAPS, and legislation based on them at international and national levels is not endangered and that the change from the 2010-2020 strategic framework towards the next one works is as fluent as possible.

Below you will find a list of key issues which we feel need to be adequately addressed under the new target system. Many of these are already reflected in the current Aichi targets, or can be part of enhanced Aichi targets, be it in the targets themselves, in the target's explanation, in its rationale or its implementation plan. Where necessary, a limited number of extra target(s) will need to be added.

Issues to be addressed in the post 2020 strategic framework

a. Tackle the drivers of biodiversity loss

Biodiversity cannot be conserved without thoroughly tackling the drivers of biodiversity loss. They all need to be identified, and plans and regulations need to be set up to reduce their impact.

Amongst the main specific sectors which need to be reduced and whose negative impacts need to be stopped are:

- Agribusiness and agrocommodities
- Extractive industries
- Energy sector, especially fossils, nuclear energy, biofuels and hydrodams
- Unsustainable fishing
- Unsustainable and mass Tourism
- Unsustainable Trade

As defined in current Aichi target 3, all economic activities, perverse incentives and subsidies that drive biodiversity loss need to be stopped. All subsidies and incentives should be systematically monitored for their biodiversity impact, and phasing them out needs to become part of governmental planning.

Stopping perverse incentives is a key element in tackling the drivers, yet the target need to be made more comprehensive, including elements on investment, production and consumption.

Investment for biodiversity destructive sectors and activities needs to be systematically tracked and its flows need to be regulated in order to stop their negative impact.

Production and consumption patterns regarding the above-mentioned sectors need to be changed. Again, regulation plays a key role in this. Unsustainable production processes need to be prohibited. Funding for unsustainable processes, including agricultural ones and extractives, both at the national and the international level needs to be abolished and infractors punished. Real verifiable information needs to be given about the ecological impact of production processes. Those who make false claims need to be legally persecuted. This point closely relates to Sustainable Development Goal number 12.

Specifically on agriculture, it is proven that there are ways to increase yields, and feed the global population with healthy food, in ways which are consistent with biodiversity. Agrobiodiversity is a key element of biodiversity. Agroecology is an agricultural practice that mimics natural processes to deliver self-sustaining farming growing a greater diversity of crops, drastically reducing artificial inputs (pesticides, fertilizers, antibiotics) and recycling nutrients (plant and animal waste as manure). It views agricultural areas as ecosystems and is respectful for the relation with other ecosystems.

b. Protection for those who defend biodiversity-rich territories

It has been demonstrated that the best conserved areas are in the hands of indigenous peoples, and that they are most at risk of losing their territories, which often translates in loss of natural habitat as well. In the process of defending their territories, indigenous peoples and local communities often put even their lives at risk.

Therefore, parties need to commit to real protection of environmental defenders. The CBD needs to involve the relevant international human rights bodies and include a human rights focus in order to achieve real progress here.

For Indigenous Peoples' and Community Conserved Territories and Areas to continue to have the demonstrated high conservation states, parties need to recognise and protect collective land tenure and the right to govern their land according to traditional structures and with autonomy. This includes the right to say no in Free Prior and Informed Consent processes. The Voluntary Guidelines on Tenure by the Committee on Food Security are an interesting instrument to be taken into account on this: http://www.fao.org/tenure/voluntary-guidelines/en/

Both for conservation and for restoration, the CBD and Parties must respect and build on traditional knowledge of indigenous peoples.

c. Protected areas and OECMs

Protected Areas and Other Effective Area-based Conservation Measures are the main areas where ecosystems can flourish. They are under increased threat, including through external pressure, climate change and diminished connectivity, and diminished ecosystem functioning.

In order to preserve them better, the global amount of biodiversity-rich ecosystems (notably Protected Areas and OECMs) should increase. Protected areas have a very important role in areas where no indigenous people or local communities live.

In areas where IP/LC live, and which are already catalogued as Protected Areas, these should be either opened up for governance by IP/LC, either reverted to OECMs.

All areas with (semi-)intact ecosystems where IP/LC live, and where they want to protect these areas, should become recognised as OECMs, under the governance and autonomy of these IP/LC. No new areas where IP/LC live should be marked as Protected Areas.

Both Protected Areas and OECMs need to be guaranteed real protection. This also includes that the necessary management measures are taken. They should not be intruded by agricultural plantations, oil extraction, mining, or big infrastructure projects. This type of projects is per definition contrary to a protection status.

The connectivity of Protected Areas and OECMs needs to be increased. Species have the need to be mobile between bigger areas. Climate change increases this necessity, as many species need to move north or up for their survival.

d. Biodiversity-rich management of areas where humans live and work

While Protected Areas and OECMs are the hotspots for biodiversity, concentrating all biodiversity there, and turning the rest of the globe into zones which are extremely low on biodiversity is counter-productive. All areas need to be as biodiversity-rich as possible. Specific policies and measures need to be set up to ensure that biodiversity is as well-preserved in any area, including those intensely used by humans, as possible.

This includes attention for livability of natural species within human-used areas. It includes promotion of biodiversity rich cities. Special attention needs to be given to rural areas, where

nature and agriculture are closely intertwined. Small scale agriculture, agroecology, and agrobiodiversity are key elements.

Any kind of land management that results in areas where biodiversity becomes extremely low needs to be prohibited.

e. Ecosystems

Key ecosystems need to have dedicated protection. Of special importance for the health of planetary functioning is the preservation - in terms of sufficient area, connectedness and reasonable level of functioning - of the following ecosystems:

- Natural Forests
- Mangroves
- Savannahs
- Arctic
- Oceans, including corals, coastal areas, marine areas beyond national jurisdiction and deep sea bedding
- Natural and semi-natural grasslands
- wetlands;
- Soil biodiversity
- Freshwater habitats
- Peatlands

Ecosystems need to be protected for their intrinsic value. Their functioning needs to be as optimal as possible. Reducing ecosystems to their contribution to human economy, and calculate this as “ecosystem services” is not a useful approach.

The focus should be maintaining ecosystems covering sufficient and connected areas, and to have them as intact and functional as possible.

Restoration of ecosystems is also important and should be done in ways that simulate as much as possible the original environment, before the destruction happened. In a view that restored ecosystems will never obtain the same state as non-disturbed ones, it is inadmissible to plan for restoration as a measure to compensate planned destruction.

Specific work programs need to be set up within the CBD to attend the different ecosystems. They each need to come up with plans and mechanisms to bring the ecosystems back to levels whereby their long term survival and healthy functioning is ensured, taking into account best available science.

The CBD needs to reclaim its competence and responsibility on the conservation and sustainable use of forests.

Specific threats to each type of ecosystem need to be monitored, and regulated. Examples are the threat that deep sea poses on deep sea mining or the plastic waste to oceans, amongst others.

Use of resources needs to be kept well within safe ecological limits. For natural resources this implies use at a rate lower than its replenishment rate. Sufficient margin needs to be given so that ecosystems can recover from overuse. For non-renewable resources this implies use in a manner that allows their full re-use and where not possible safe disposal of their waste in ways that do not harm the long-term wellbeing of ecosystems.

f. Toxic substances and pollutants

All possibly pollutant substances should be banned or maintained within levels that don't negatively affect the ecosystems.

All substances released in the environment that can possibly be toxic need to be closely monitored for their possible detrimental impacts on ecosystems and the environment.

For substances that have intended positive side effects - such as certain fertilisers and pesticides claim to have - a full cost-benefit analysis needs to be done, including alternative solutions.

For substances that are an externality to other production processes, their release into the environment shall be banned. Their use should be limited to a minimum, and ways of capturing, treating and storing them that are not detrimental to the environment shall be legally imposed by all parties.

g. Genetic diversity

Genetic diversity is the basis of biodiversity and is severely under threat. The threat expresses itself not only in the extinction of species, but also in the reduction of genetic diversity within individual species, which is also closely related to the decline of population levels of species.

Diminishing genetic diversity within species reduces their overall resilience by making them more vulnerable to diseases and to different forms of stress, both abiotic stress (temperature, fire, etc) and biotic stress (pests, diseases, pathogens, predators).

Therefore, measures need to be taken to increase genetic diversity. Ensuring corridors of natural areas is essential so that species can mingle, expand their territory and adapt.

Genetic diversity, in its various aspects, is key for ecosystem functioning, and vice versa. Protection of both cannot be seen as independent of each other.

Agrobiodiversity -broad genetic variety of and within agricultural species- thrives on, and enhances, general biodiversity. Also, food species' diversity is reduced due to a push towards intensive farming and uniformity. This increases both threats towards these uniformed species, as they are more vulnerable for diseases, and reduces the interaction with diverse ecosystems around the agricultural area, as is the case in agroecology.

Another way in which genetic diversity is under threat is by genetic contamination of natural by LMOs and synthetic biology. Clear protection measures to maintain the natural population of species uncontaminated by genetically modified varieties need to be set up. Transboundary elements are important and need to be considered by the Cartagena Protocol.

Synthetic biology is not an answer. Neither bringing back extinct species, nor exterminating species considered harmful are compatible with natural ecosystem and genetic development and should not be considered a valid option.

h. Climate change and desertification

Climate change, desertification and biodiversity are intrinsically linked. Big areas of well functioning ecosystems are essential in buffering the effects of increasing climate change and desertification. At the same time, both climate change and desertification have a very negative impact on biodiversity and ecosystems.

Therefore, it needs to be ensured that ecosystems will have sufficient conditions to adapt to climate change and desertification.

All measures that refer to protection of ecosystems are extra important in the light of climate change. Further increase in temperature rise, and the related deterioration of ecosystems and the species in it, will lead to even higher requirements of ecosystem conservation, in order to stop the vicious circle of mutual negative effects.

Measures that could potentially have positive effects for climate change, but which have negative impacts on biodiversity cannot be adopted. The CBD needs to prevent UNFCCC form doing so and continuously study the biodiversity impacts of all proposed climate change measures, and issue warnings when they are negative. Specifically, proposals such as geo-engineering, including Bio Energy Carbon Capture and Storage (BECCS) need to be closely scrutinised and stopped.

i. Nagoya Protocol on Access and Benefit-sharing

While the Nagoya Protocol now has meanwhile been ratified or accessed by 114 states and with its entry into force in 2014 was the only Aichi target that was met by its timeline (2015), it is still far from being properly implemented in many countries. The Protocol must be fully operational, including at national levels, by the end of the post-2020 framework. The follow - up of target 16 could be somewhere along these lines:

“For all genetic resources that are accessed for their utilization, as well as for subsequent applications and commercialisation, fair and equitable benefit-sharing agreements are in place based on free, prior and informed consent and mutually agreed terms with the relevant custodians of the genetic resources. The same applies if their traditional knowledge associated with genetic resources is accessed.”

In addition, it must be clearly stated that any utilisation of digital sequence information must be subject to the Nagoya Protocol.

j. Cartagena Protocol

There is an urgent need to include biosafety in post-2020 global biodiversity framework, given that living modified organisms resulting from modern biotechnology may have adverse effects on the conservation and sustainable use of biological diversity, taking also into account risks to human health. In this regard, we welcome the recent decision by Parties to the Cartagena Protocol on Biosafety to develop a specific Implementation Plan for the Cartagena Protocol on Biosafety post-2020 that is anchored in and complementary to the post-2020 global biodiversity framework.

The elements of the biosafety component of the post-2020 global biodiversity framework should include the following elements of the Strategic Plan of the Cartagena Protocol on Biosafety 2011-2020 that are still relevant:

- development of biosafety legislation,
- risk assessment and risk management,
- detection and identification of living modified organisms,
- socio-economic considerations,
- liability and redress
- public awareness, education and participation.

The elements of the biosafety component of the post-2020 global biodiversity framework should also include the following new elements reflecting lessons learnt and new developments relevant to biosafety:

- horizon scanning. monitoring and assessment of new technologies particularly in relation to synthetic biology, in order to be able to anticipate, monitor and assess developments in this rapidly developing field and their potential impacts on the objectives of the Convention and its Protocols
- precautionary measures that may be implemented for new technologies in relation to synthetic biology, and particularly for organisms containing engineered gene drives
- the means by which the free, prior and informed consent of potentially affected indigenous peoples and local communities is obtained for any releases of living modified organisms into their lands and territories.

9) Implementation mechanisms and review processes

In its 26 years of existence, the CBD has adopted a wealth of decisions, and since the adoption of the CBD strategic plan in 2010, has worked on its implementation. While some progress has been made in a few areas, a number of things have even turned worse and overall the majority of the targets will sadly not be reached. This is not the fault of the targets - there is no alternative to reaching them (and even doing more) if we want to stop biodiversity loss.

As already stated in the section ”Analysing the Reasons for non-implementation of the current strategic plan, the NGO major group presented to this year’s HLPF the analysis that amongst others lack of political will and the inability to address root causes, including an economic model relying on unlimited growth were key reasons why biodiversity targets were not reached.

In result, not enough action has been taken to implement the biodiversity targets. This is actually the most important issue that needs to be improved: to improve implementation of the decisions the CBD has taken. It is vitally important to have the analysis on lessons to be clear on the obstacles for implementation.The reasons stated above certainly play a key role in the analysis.

Implementation should be strengthened by adopting the following elements:

Measures for implementation

- NBSAPs are the key element **for the implementation of the CBD at natio**nal level. **When establishing NBSAP**s, civil society needs to be involved. NBSAPs need to be checked if they reflect the CBD’s targets to the right level of ambition.
- Where not yet established, clear **legislation for the conservation and sustainable** use of biodiversity needs to be established.
- In all Environmental Matters, civil society must have **access to Information**, be enabled to **participate in decision-making** and have **Access to Justice** in case of alleged breaches to environmental legislation, even if they are not personally concerned.
- **Horizon scanning** to have an early warning system for any issues that can potentially harm biodiversity mean a needs to be institutionalised

- Resource mobilization and finance: as stated above, resources need to be upscaled in accordance with the needs, as stated in Decision CBD/COP/14/L.33, para 15a-c.
- The CBD secretariat needs to be strengthened - and necessary funding for it ensured - to better enable them to:
    - Do risk assessments and benefit analysis of possible technologies, processes or substances that can possibly be harmful for biodiversity
    - To assist regions in their implementation of the targets
    - To assist countries in the development of their NBSAPS help regions

Review and compliance

- Parties need to be held responsible, accountable and committed, and be transparent on their actions concerning biodiversity.
- Regular reporting of the state of implementation of the agreed targets along a strict, measurable matrix is necessary to monitor progress.
- Reporting and review need to be able to identify specific countries. This is to better pinpoint support and have a basis for prioritisation and allocating international biodiversity-related finance. In Europe, both the EU and the Bern Convention have successfully used comparisons of implementation progress to create momentum.
- The **voluntary peer review mechanism** established under the convention is an important step to move implementation forward, it can help by passing on experience and solutions to other countries who are willing to undergo such a review.
- Ideally, however such a **review** should be **compulsory** and include all parties.
- A **compliance mechanism** has to be set up that includes a **compliance committee** to which alleged breaches of the convention and its Protocols, as well as non-compliance to the post 2020 objectives can be submitted by anyone. The compliance committee should discuss the matter with the parties concerned as well as those who have raised the matter, and can issue recommendations to the party which it must implement and which are to be followed up at the committee's subsequent meetings. Models for this are to be found in the Aarhus Convention and also in the Berne Convention's case file system.
- Parties which clearly and repeatedly fail to respect the compliance committee's recommendations and the CBD's targets must be held accountable and concrete sanctions need to be given.

10) Indicators

Indicators for the CBD's Aichi targets (https://www.cbd.int/sp/indicators/) and for the environment-related targets under the SDGs https://unstats.un.org/sdgs/indicators/indicators-list/) have been worked out. These can likely continue to be used in the post 2020 framework, especially if the new targets build on the current Aichi targets as FoEI suggests. The continuity of indicators will enable a continuous comparison of progress in the CBD's implementation. Existing indicators should therefore generally be preferred over new ones to the extent possible, even if the targets have changed a bit, and synergies between Aichi and SDG indicators should be used.

11) Communication and outreach

The main task for outreach is to make sure that biodiversity gets high up the agenda of all international fora, as well as national decision-making bodies. They must feel responsible for biodiversity related policy elements in their own process.

The second task is to communicate to the general public, and ensure that the biodiversity crisis is taken serious by the population.

An important outreach task will be to communicate the new framework to all relevant actors, in such a way that it generates a new wave of trust that this plan is serious, and will be implemented. On the contrary, the lack of belief that others will implement will in itself lead to diminished implementation.

What should by all means be avoided in the post 2020 process, is to repeat the Paris experience. The Paris agreement is NOT responding to its purpose, as global warming is still on track for 3.2 degrees. Nevertheless, concerted communication by the UNFCCC and the media have made the public believe there is a positive answer. This is actually more dangerous than an honest communication about the shortcomings of the agreement. False positive views on the outcome lead to further inaction.

12) To be avoided

Not only the important elements in the post-2020 framework need to be outlined, as done above. But also issues that need to be avoided. Some of them because the past has shown that they were bad proposals, others because of legitimate concerns.

a. Voluntary Commitments

Parties need to step up and commit to their fair share to ensure the world keeps on track to maintain us within planetary boundaries. NBSAPs need to take up all the relevant issues addressed in the strategic plan.

The model of voluntary commitments is not sufficient to respond to the planetary crisis. Pretending the gap between commitments and what is needed for the health of the planet can be closed later on is not a good practice because with that the achievement of the biodiversity targets is postponed, and may not be happening later either.

b. Danger of one single biodiversity metric

Reducing all the biological diversity into one single metric is scientifically impossible and dangerous. Any metric will take into account certain aspects of biodiversity, or of ecosystems, or of genetic diversity, and will thereby automatically leave out other aspects. This is especially dangerous as biodiversity has so many interlinkages related to different aspects. Ignoring such aspects will lead to further decline of biodiversity.

Avoid false definitions that allow parties to technically comply with targets, while in practice being unhelpful for biodiversity

All targets and measure must be oriented to the real protection of biodiversity and ecosystems. Measures that are oriented to “comply on paper” but which do not lead to

enhanced biodiversity are not only useless, they are counterproductive. A big example is the definition of forests, which currently also includes plantations. Parties thereby show they comply with the amount of forests needed, while in reality it includes plantation land that is completely void of biodiversity and functioning ecosystems. Another example are many Natural parks which are not effectively protected.

c. Putting a price on nature

Economic valuation and accounting is very difficult if not impossible; it should not be included as a measure. Biodiversity lives independent of human economy and cannot be expressed by it. Trying to do so not only ignores many other aspects, it is also intrinsically unfair - as only those aspects of biodiversity which the economically potent value will be accounted for.

It is further a bad basis for making policy discussions. Once elements of biodiversity are assigned a price, then projects that would make more profit than the loss of the biodiversity will be prioritised. The intrinsic value of biodiversity gets lost. The overall need of having sufficient biodiversity is also not taken into account in such considerations.

This also implies that ecosystems should not be reduced to “ecosystem services”.

Therefore, Friends of the Earth also opposes natural capital accounting, as it leads to decision making on the basis of economic valuation. Many elements of the so called “green economy” are also based on the same premises, which we therefore resist.

d. Compensation and Offsetting

In the current state of biodiversity, we need to preserve all valuable ecosystems, and restore other degraded land. Conserving or restoring one area can not in any circumstance be an excuse for destroying valuable ecosystems somewhere else.

This practice is refutable both in cases of compensation and even more so when economic transactions are part of this, as in biodiversity offsetting.

e. No to “half earth” proposals

Biodiversity needs to be preserved and enhanced everywhere. It is indeed necessary to have dedicated OECMs and Protected Areas. But it is also necessary to make the areas outside, in which humans develop their everyday life as biodiversity friendly as possible. Biodiversity needs to be protected everywhere, not only in part of the world, even if it were half Earth.

On the other hand, there is the danger that the half earth proposal leads to conflicts about territories.

f. Current understanding of mainstreaming

While it is really important that all sectors start taking into account biodiversity in their decision-making processes, the current proposals to bring them to do so, as expressed in the various “mainstreaming” exercises are counterproductive.

Current mainstreaming is oriented to bring sectors to the biodiversity table on their own terms. Everything is done to assure them that their development will not be affected.

However, unlimited economic growth and unlimited development of economic sectors, especially those with severe impacts on biodiversity is not compatible with environmental conservation. Trying to make it seem as if it does is counterproductive.

Most of the mainstreaming proposals are also based on voluntary measures by corporations, and on trust in them that they will do the right thing for the environment. Unfortunately, history has taught that most promises by corporations are not fulfilled, in detriment of the environment and of human rights.

Future dealing with other sectors needs to put the environmental needs at the centre of decision making. Regulation to ensure the common good of a liveable environment is not affected is needed. Mechanisms to enforce compliance will need to be set up.

g. Technofixes

Technofixes for environmental and other problems are highly dangerous. They bear in them the risk of triggering even further unforeseen environmental problems. They also are inherently oriented towards a business-as-usual scenario for the economy, as they bear the promise of easy solutions that do not affect it. Further, most technological solutions are linked to enormous economic interests by industry.

Therefore, any proposed technological solution must first be fully scrutinised for the precautionary principle. The claimed benefits need to be verified carefully. And broad consultations with the population in general and especially with affected communities needs to be done.

Examples of technofixes that need to be rejected are:

- Geo-engineering. The reasons for the current standing moratorium under the CBD are still as valid as ever. The CBD needs to continue communicating about the moratorium, and about the dangers for biodiversity, towards the UNFCCC.
- Modern biotechnology (genetic modification, genome editing and synthetic biology) pretend to offer answers for agriculture and biodiversity. So far, most claims made have been proven false, while significant negative impacts of this kind of technologies have already been felt around the world, and more are expected.

It is expected that in the next decades, more proposals for technofixes will be made. The CBD needs to have a strong section in the secretariat, and needs to have strong structures to carefully consider all the possible risks and outweigh them to verified benefits.

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