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To: Secretariat

Cc: Fredrik Haag; Andrew Birchenough; Megan Jensen; Gary Chew

Subject: Scope and content of the post-2020 global biodiversity framework (re: CBD Notification 2018-063)

Dear colleagues,

In response to CBD Notification 2018-063, the International Maritime Organization (IMO) would like to contribute to the discussion on the scope and content of the post-2020 global biodiversity framework.

IMO wishes to highlight two high-level points, or principles, which had also been recently expressed with the opportunities of SBSTTA 22 and the EMG Nexus Dialogue on Biodiversity (as well as in the inter-agency liaison group on invasive alien species). These relate to the need (a) for increased attention to prevention and (b) for balance between the terrestrial and marine domains. Specifically:

1. Particularly in discussions on invasive species, the focus appears to be on response (eradication, impacts, etc.), with no attention to prevention. We believe that there should be increased focus on prevention, as eradication is usually all but impossible.

2. We have observed that discussions on biodiversity seem to focus disproportionately on the terrestrial domain – this is a concern as marine ecosystems are no less important than terrestrial ones, but they don't seem to receive as much attention in these discussions.

We do appreciate that our comments come from IMO's specific angle, which is the prevention of harmful impacts to the marine environment from shipping; however, we believe that the two above-mentioned overarching principles are objective and of general validity, and we hope that they will be taken into account in the development of future global biodiversity frameworks.

IMO is looking forward to participating in relevant further deliberations and we will await to hear about next steps.

Best regards,
Teo

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