

Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
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Dear CBD Executive Secretary,

The Natural Capital Coalition acknowledges the opportunity to provide [views on the scope and content of the post-2020 global biodiversity framework](#). On response to this invitation, we would like to provide our recommendations on:

I. Achievements and limitations of the current framework

The Natural Capital Coalition encourages to the CBD to have a reflection on:

- **WHAT?: Lessons learnt and ways to move forward:** The CBD should identify the successful elements from the Aichi Targets framework to foster them, as well as the unsuccessful ones to explore the reasons behind the failure and ways to work out them. Defining principles could be a way to guide the definition of new target, for example, having credible targets. Some of the current targets (i.e. Target 7) are wildly unrealistic, which undermines their overall credibility in the eyes of governments and other actors. Making explicit the interconnectivity between targets and other policies could also help in defining the post-2020 framework.
- **HOW?: Need to identify drivers and allocate responsibilities:** The new framework must be underpinned by a good understanding of the drivers of biodiversity loss and dependency on nature. A natural capital approach provides a framework to respond to the how/the process to identify, measure and value our relationship with the natural world and it will be essential in achieving internally agreed targets. Besides, 'a goal without a plan is just a wish'¹. The current framework emphasises, through the Aichi Targets, what needs to be halted, reversed, reduced. But it is not clear how these targets should be achieved and who should be responsible. Achieving many of the targets relies on action outside the biodiversity 'community' and requires the involvement of all actors of the society, including the business and finance community. All these actors depend on nature and so, all of them share a shame goal: preserving nature. By joining forces on enhancing biodiversity, the goal will be achieved more efficiently. The post-2020 framework must indicate which actors and sectors are responsible for achieving specific targets and actively engage them in shaping and implementing the new framework.

¹ Antoine de Saint-Exupéry.

II. Suggested priorities for the post-2020 framework

Based on the previous reflections about (i) what are the lessons learnt and (ii) how the process should be defined and implemented, the Natural Capital Coalition suggests the following priority areas for the post-2020 framework:

- 1. Ensure targets are informed by robust understanding of impact and dependency processes.** The post-2020 biodiversity framework must be more realistic, tangible and measurable than the current one. Natural capital approaches propose a way to understand the connection between drivers of biodiversity loss and their consequences for society. Natural capital approaches show how society depend on nature and this motivates its preservation. Consequently, natural capital approaches provide a tool to illuminate decisions that must be taken when developing and implementing the post-2020 framework. The IPBES global assessment on biodiversity and ecosystem services and the Global Biodiversity Outlook 5 provide a good basis of robust information. Given that a clear and consistent monitoring framework is needed for the post-2020 biodiversity agenda, due consideration should be given to existing systems, such as the [System of Environmental Economic Accounting](#) (SEEA). The SEEA should also be promoted to inform biodiversity policies.
- 2. Warrant a strong focus on implementation and engagement.** Overall, there needs to be more emphasis on implementation and accountability in developing the revised framework. A key step will be to strengthen the National Biodiversity Strategies and Action Plans (NBSAPs) together with the existing national reporting mechanisms so that their accuracy can be improved, and in order that they can be aggregated to provide a global picture. A successful implementation will not be possible without an active and effective engagement with the business and finance community. This requires their engagement from the early stages of the definition on the post-2020 framework.
- 3. Use system thinking approach to show interlinkages between targets.** For example, delivering some of the Aichi Targets which reduce threats to biodiversity (e.g. perverse subsidies, deforestation) will help contribute to the achievement of other targets (reduce extinctions of known threatened species).
- 4. Ensure alignment with climate change agreement and SDGs.** The post-2020 framework must link to, and complement, existing international environment and development policy. Specifically, the framework should refer to, and be coordinated with international agreements on climate change and the UN Sustainable Development Goals (SDGs). The trade-offs from the implementation of climate change agreement for enhancing biodiversity should be taken into consideration and fostered. Similarly, all seventeen SDGs and most of their specific targets are related in one way or another to biodiversity but the Aichi Targets expire in 2020, while the SDGs run to 2030. The new framework must be fully aligned to the SDGs, not just including targets where biodiversity contributes to the fulfilment of specific goals, but also mitigating actions where achievement of specific SDGs might present a threat to biodiversity. In addition to updated, SDG-compatible targets, the new framework should be aligned time-wise with the SDGs – i.e. expiring in 2030. Ideally, a joint reporting framework would be developed to further enhance synergies and coordination with the SDGs and other environment and development policy frameworks – particularly at the national level.
- 5. Promote the context needed to transition towards a society where biodiversity is integrated in decision making.** The movement towards more sustainable and greener economies is ramping up around the world, with governments propelled by science, their citizens and international agreements to adopt new policies and strategies. The post-2020 framework can benefit from this context and foster it to

speed-up the implementation of the post-2020 framework by encouraging several areas, including:

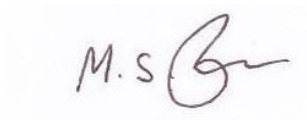
- **Support natural capital approaches as a tool, amongst others, for better decision making on biodiversity:** At the heart of a natural capital approach is the understanding that nature underpins human health, wealth, culture, identity and happiness. A natural capital approach works to illuminate this value and enables decision makers to understand the complex ways that societies and economies depend on nature, including biodiversity. Natural capital approaches are providing one useful lens to highlight the economic value of nature, but they need to be seen alongside other important values, which include cultural and spiritual values as well as intrinsic value. Taken together they can help create better informed policies and planning measures to conserve biodiversity.
- **Support national natural capital accounting.** The Aichi targets (target 2) mention that biodiversity needs to be incorporated into national and local development planning processes and poverty reduction strategies. The problem is that natural capital initiatives – including biodiversity conservation measures – are happening in isolation from economic and social policy making. For this reason, natural capital approaches and biodiversity conservation measures need to be mainstreamed into policy.

Target 2 also mentions the need to integrate biodiversity into national accounting systems, which is positive but insufficient in itself. There are over 100 natural capital accounts now being produced by governments across the world, but they are currently not being used to inform policies. These accounts need to be integrated with economic governance metrics and process should be put in place to incorporate them into policy decision making.

- **Support links between business and government led approaches.** At the same time, businesses are increasingly recognizing their reliance on natural capital through their supply chains and business models and are becoming sensitized to biodiversity through developing natural capital assessments (by, for example, applying the Natural Capital Protocol) and environmental profit and loss accounts. Businesses are collecting a growing amount of data on local biodiversity, but that data doesn't currently connect with national accounting systems. In order to motivate businesses and provide the kind of targets that are needed, these accounts need to be translatable to the national level. Similarly, the national capital accounts being produced by governments are far too coarse grained for firms to make use of in their investment decisions in specific locations. This contradiction needs to be resolved so that the natural capital accounting systems used by governments and businesses connect.
- **Engage with the finance community** by proving the exposure to risks from biodiversity loss, as well as the opportunities from biodiversity enhancement. The finance community is becoming increasingly sensitive to climate risk and has been stress tested against climate change. The finance sector is starting to develop some initiatives to assess their exposure to biodiversity risks (e.g. [Global Biodiversity Score](#)), but overall biodiversity is less well represented than climate change. Making financial markets and financial investments sensitive to biodiversity is a crucial step towards slowing biodiversity loss and enhance biodiversity gain. Natural capital approaches can be a key means of accomplishing that.
- **Connect natural capital and green economy approaches:** [Green Economy Coalition](#) members are committed to ensuring that natural capital and green

economy policies are integrated more coherently. Green growth plans need to be developed in view of a country's natural capital stocks and flows. Ten countries are currently members of UN PAGE ([Partnership for Action on Green Economy](#)), and their green economy strategies need to specifically address biodiversity conservation and be well integrated with national measures to meet CBD convention commitments. The same goes for other countries which are developing green economy and natural capital measures, for instance in collaboration with the [Global Green Growth Institute](#), [Green Growth Knowledge Platform](#), [Natural Capital Coalition](#), etc. Currently green economy discussions and strategies often focus on climate and energy, while neglecting natural capital (including biodiversity). Therefore the post-2020 framework should make reference to green economy policies and plans and should stress the need to go beyond the usual focus on climate and energy to explicitly incorporate biodiversity and natural capital.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'M. S. Gough', is written over a light blue rectangular background.

Mark Gough

Executive Director