

December 14, 2018

Dear Executive Secretary,

The undersigned organizations are writing in response to the notification of 16 July, 2018, **Invitation for views on the preparation, scope and content of the post-2020 global biodiversity framework**. We note rapidly accelerating biodiversity and climate change crises, the fact that these crises are inextricably linked, and the critical importance of a science-based post-2020 global biodiversity framework and 2050 vision with the necessary ambition to resolve these crises as the next decade may be the last opportunity to avert catastrophic biodiversity and climate change scenarios.

We therefore respectfully submit that the points below are crucial for an effective post-2020 target and for making progress towards the 2050 vision.

- **Ecosystem Integrity:** Ecosystem integrity is a foundational, unifying concept on which the post-2020 global biodiversity must build. This important concept figures prominently in other key international agreements, including the Rio Declaration and the Paris Agreement under the United Nations Framework Convention on Climate Change, and was recently highlighted in CBD/COP14/L23 Biodiversity and climate change. Maintaining and restoring ecosystem integrity should be overarching objectives of the Convention on Biological Diversity going forward. Ecosystems with a high degree of integrity are crucial because they have all, or nearly all their characteristic, evolved biodiversity, and by virtue of retaining their biodiversity also maximize ecosystem services. Ecosystems with a high degree of integrity generate higher carbon stocks, and also safer carbon stocks as these ecosystems are more resistant and resilient to change, and often more stable than degraded ecosystems. Ecosystems with a high degree of integrity prevent erosion, regulate water and flows, have higher adaptive capacity and are critical for livelihoods. While it is important as a general matter to protect biodiversity and ecosystem services, we believe it is necessary to sharpen this focus in a post-2020 global biodiversity to recognize the unique and often irreplaceable values that ecosystems with a high degree of integrity provide.

We also note that it is important to recognize the importance of areas with high ecosystem integrity whether they are large or only small fragments. Small areas with ecosystem integrity are vital for biodiversity protection in fragmented landscapes where they are the last habitats for rare or threatened biodiversity, and are also critical to ecological restoration efforts.

- **Primary Forests:** primary forests perhaps best exemplify the links between biodiversity, ecosystem services and ecosystem integrity in a terrestrial context. Primary forests have the highest biodiversity, the highest carbon stocks and provide the cleanest freshwater. They are therefore irreplaceable ecosystems, and their protection, whether in large areas or small fragments, should be an urgent and high priority given they continue to be under severe threat (less than a third of the planet's forests are primary forests). Their exceptional importance and the need to avoid their further degradation, fragmentation and loss was clearly highlighted in

CBD/COP14/L21. However, recognition of primary forests should be further enhanced in several respects to fully recognize their higher biodiversity and ecosystem service values:

- It is important to move away from assessment approaches that focus on net gain or loss of forests as this may result in exchanging primary forests for degraded forests or plantations.
 - We also note that primary forests, whether large or small, are critical to ecosystem restoration efforts. Primary forests provide the seed bank, and the seed dispersers, necessary for natural regeneration of forests. In the tropics, for example, natural regeneration often occurs within a few hundred meters of a primary forest. Thus, primary forest conservation is essential to restoration efforts in fragmented landscapes – while restoration efforts also help to buffer primary forests from edge effects and provide connectivity to other primary forest patches.
 - A post-2020 global biodiversity framework should also recognize the extensive literature indicating while there is a range of mechanisms that are effective for protecting primary forests (including protected areas, indigenous and community conservation initiatives, private protected areas, payments for ecosystem services), industrial activity is not sustainable in primary forests.
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- **Promoting integrated approaches to the environment and rights:** It has long been apparent that environmental and social problems are closely intertwined. It is therefore no longer sufficient to say that we need to solve both – it is important to recognize that they must be solved *together*. Recognizing and fully respecting rights, and applying rights-based approaches in conservation at all times, are essential. We must address rights, climate and biodiversity and ecosystems in an integrated fashion, and this key principle should be reflected in the post-2020 global biodiversity framework and 2050 vision.

With many thanks and best regards,

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