

**TEMPLATE FOR COMMENTS AND ADDITIONAL VIEWS ON THE PROPOSALS FOR A  
COMPREHENSIVE AND PARTICIPATORY PROCESS FOR THE PREPARATION OF THE  
POST-2020 GLOBAL BIODIVERSITY FRAMEWORK**

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<b>Comments on the draft proposals</b>		
<b>Page #</b>	<b>Para #</b>	<b>Comment</b>
0	0	<p>We appreciate the efforts made by the SCBD in drafting the document and in outlining the process towards the development of a Strategic Plan (SP) for the CBD and its Protocols. However, looking at the different SP for the CBD and the Cartagena Protocol (CP) and noting their completely different structure and content, we think that the proposal on how to develop an integrated biodiversity framework for the three instruments can be improved. The current CBD SP is quite general and defines targets for implementation while the current SP for the CP is listing concrete targets, outcomes and indicators. Though it is recognized that the CP SP might be too detailed in some aspects, it provided valuable guidance in the work of the SCBD, the Parties and guided the COPMOP in its decisions over the past years. To get back to a general description or listing of overall targets without further concrete specifications would be a step in the wrong direction and would likely impede the implementation of the CP.</p> <p>We also believe that the implementation of the CP may be further hampered by decreasing its visibility, by not even mentioning “biosafety” in the title of the framework.</p> <p>Though we do agree that a better integration of the CBD and the Protocols is important and appreciate the efforts made so far, we also believe that this integration should strengthen all three instruments, i.e. the CBD and the Protocols. In increasing the integration it is also important to keep the different scope and content of the CBD and the CP in mind. The development of a single SP for all three instruments might be not the best way to address these differences. We think that a combined approach, including a few paragraphs on the strategic goal in the area of the CP in the general strategy covering all three instruments and – anchored into these strategic goals – a more detailed “implementation plan for biosafety”, could better serve the purpose.</p> <p>We noted that the description of the process itself focuses very much on the CBD, and that the process as described does not take into account that in most countries experts and sometimes even the competent authorities dealing with the CBD and the CP are different.</p> <p>We therefore suggest to adjust the proposed process in order to enable CP experts to get</p>

		involved, or to state more clearly that they will be involved and how this will be achieved.
10 ff	40	All activities should indicate explicitly how experts for the two protocols will be involved, or how the activities such as described in 40 c to g will consider aspects related to the Protocols. The phrasing used e.g. in 40b. “An adequate level of involvement...”, or similar is not sufficiently clear and too general.
10	40b	The regional and global workshops should have dedicated time slots for discussing the SP for the Protocols. We therefore suggest to organize parallel sessions for the CBD and the two Protocols and to organize a plenary session at the end of the workshop where the results will be brought together and can be discussed. In any case it should be explained in more detail how the issues related to the Protocols will be dealt with during these workshops.
11	42	We don’t believe that leaving it up to the Parties to promote the involvement of the focal points of the Protocols is adequate. As outlined above, the whole process should be designed in a way that it already involves the focal points of the Protocols and the relevant experts from the beginning. We think it is the responsibility of the SCBD that this is addressed when contacting Parties for submission of views (as described in para 40a) or when drafting the programme of workshops (as described in para 40b).
12	43 (last para)	Though it is mentioned in 43 a and b that the information sources used for drafting discussion documents do also include the national reports and the clearing house mechanisms of the Protocols, there is no reference to any activity related to the Protocols in the last para of 43. All activities described relate to an analysis of experience with the SP of the CBD or the Aichi targets. It is not clear how the experiences in implementing the SP of the CP will be considered or if an analysis of these experiences will be undertaken at all. We believe that if that is omitted from the process the implications for needs listed in the last sentence of the para which are also very relevant for the CP – probably in a slightly different way than for the CBD – can not be adequately addressed.
12	44	The specific section of the webpage should be either a common section of the CBD site or at least a link should be provided at the /protocol and /abs websites in order to make it more user friendly and to raise awareness regarding the process also with Cartagena and Nagoya experts, which do not visit the CBD website regularly.
		Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”

Please submit your comments to [secretariat@cbd.int](mailto:secretariat@cbd.int) or by fax at +1 514 288 6588 by **4 January 2018**