

**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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| Comments on the draft proposals    |   |  |
| Page #                             | Para #  | Comment  |
| 0<br>Sections I & II               | 0   | <p>Thank you for the work that has gone into this document. As an national organisation of (non-governmental) organisations with concerns about the environment and conservation, including biodiversity and keeping within planetary limits, we are grateful for the Background and the Prior Processes and other sections that orient us to what has been done, and the Other considerations and submissions made, as recorded in Sections I-V. We are grateful for all that work and found it very useful to have your account of it.</p> <p>We are a national organisation with a keen interest in both sub-national matters within our remit and in national and international matters. We are long-standing members of IUCN. Various of us have been on the Council and Commissions of IUCN.</p> <p>To date we have not been very aware of the specifics of the development of the CBD processes or how to have input, though generally we know about the CBD and the targets etc. We are considerably out of touch with the CBD policy development processes. We have used the Aichi and other commitments and are keen, subject to our slim resources, to stay abreast of the Strategic Plans and the development and implementation of the outcomes of the post 2020 Global Biodiversity Framework.</p> |
| 3                                  | 6   | This is an example of a specific comment on Page 3, Paragraph 6  |
| 5                                  | 18, 19  | We agree with the goal of connecting with and harnessing the biodiversity-related sections of the many other international agreements and conventions.   |
| 5                                  | 19  | As a specific point that applies to this paragraph and the document in general, we think there could be more inclusion of the marine realm agreements, including the Law of the Sea, the developing Biodiversity Beyond National Jurisdiction agreement and many other marine-related agreements.  |
| 5                                  | 20  | We welcome the 2050 Vision of the Strategic Plan and the living in harmony with nature and “By 2050 biodiversity is valued, conserved, restored and wisely used”.  |

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| 5-6 | 20     | <p>We agree that this Vision needs to have specifics defined as elements and benchmarks and scenarios to achieve its purpose, for 2030, 2040 and 2050.</p> <p>Scenarios have contributed a good deal to the discussion of climate change and greenhouse gas emissions. For biodiversity, with its many, many variables, this will be far more challenging, but is necessary to provide the tangibility that is needed.</p> <p>The IUCN Red List of Threatened Species and the Green List of intact ecosystems provide focal points and the</p> <p>Ecosystem functionality exposed in ecosystem service studies and typologies have helped many who had failed to grasp the significance of ecosystems to get some understanding of these. Reporting on these is important, so long as the disaggregation of these does not obscure the connections and importance of the whole system.</p> <p>In our view, the Vision, the tools the goals and activities need to be defined and discussed in ways that emphasise the need to maintain biophysical systems, not simply services to people. If systems fail, so do the services and stocks that benefit people and are used by them – but it is other species and their interactions with each other and the biophysical environment that are fundamental.</p> |
| 5   | 20     | <p>We consider that there could be efforts to separate discussion of “use” of biodiversity into private consumptive uses (rivalness in environmental economic terms) and the non-rival benefits of biodiversity that accrue to all. To the extent that consumptive private (ie rival) uses deprive many of non-rival benefits – many of which are vital – there may be a loss of total welfare of the population. Clearly, some consumptive uses must be made, but the ledger must also show the loss of collectively experience benefits.</p> <p>Distinguishing these rival and non-rival “uses” would help to clarify welfare implications.</p> <p>It would be helpful in this context also to address the pervasive language of “promoting sustainable use”. The fundamental ambiguity of this term may help gain agreement, but it maintains the idea that we should push for nature to be used. A more helpful and coherent formulation is that “any use should be sustainable”. We recommend that formulation.</p> <p>The nature of the use, and classification of it between rival use and non-rival would help to understand the losses to society – and the environment – incurred when there is consumptive use.</p>  |
| 6   | 21     | <p>We agree with the points made in para 21 about the need to have implementation support mechanisms, and reviews of implementation with the mechanisms listed.</p>   |
| 6   | 21, 22 | <p>We agree that there should be national goals and commitments. There may be some role for nationally determined commitments given the refusal of some countries to sign up to internationally determined limits and measures. We need to guard against these nationally determined commitments being vague, unambitious, achieved by debasement of the meanings of terms – such as “marine protected areas” that are no more than paper parks or feeble regulations with no enforcement and simply entrenching business as usual – or worse. We recognise the politics of national sovereignty and the use of that defence against international accountability.</p>  |

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| 6 | 21, 22 | <p>Requirements for reporting to be verified and that more than government reporting is achieved is essential in our view. The provisions should include separate reports from NGOs and other members of civil society. The visits to New Zealand of delegations of officials from other OECD countries to assess New Zealand's environmental performance within the OECD, can be helpful. Over the years these 10 yearly assessments have occasionally galvanised governments to improve and the public release of the reports, especially when these have not been blanded down in collusive uncriticality.</p> <p>Provision for meetings – and we suggest – reports to delegations by NGOs and others in civil society – to reviewers can help to stiffen resolve – or the PR obfuscation efforts – of governments. If ENGO reports are made public, this can help to increase transparency and veracity of government reporting. Clearly, in some countries this would be very risky to those making such reports, so it must be something to which civil society organisations give their consent.</p> <p>Another model is that of the Open Government Partnership. In this process and Independent Reviewer is appointed. NGOs and others can then report to or be interviewed by the Independent reviewer who in turn reports to the international secretariat – and the government. This may provide some shield to those who do not want to be picked on or persecuted by the government. We suggest that the option of direct submissions to the CBD secretariat and an independent reviewer might be a good mix.</p> |
| 6 | 24     | <p>We agree that the future goals should be no less ambitious than the Aichi Targets. We agree that there must be consideration of a wide variety of perspectives.</p> <p>We further support both the mapping of aspirational directions, and definable and reportable milestones.</p> <p>The IPCC has had to clearly demonstrate its scientific underpinnings, but with biodiversity, other knowledge, such as traditional and local informed ecological knowledge is also needed. Sometimes the latter may trigger further research.</p>  |
| 6 | 24     | <p>We tend to agree with the need to address and engage with the various other biodiversity related Protocols and Conventions. Care will be needed though to ensure that political or financial blockages in one place do not then lead to sclerosis everywhere.</p>  |
| 6 | 25     | <p>We agree on inclusiveness of people and groups who are representative of citizens and holders of particular knowledge. We are less convinced that corporates should have the same “voice” as citizen-based organisations or academics who may be somewhat independent of vested interests.</p>   |
| 7 | 26     | <p>Iterative processes are welcome so long as it does not lead to burn-out and exhaustion of those called to comment (and those in the Secretariat!)</p>  |
| 7 | 27     | <p>In general we agree with the points in 27. We would add that there is a need to ensure that the focus on biodiversity is not lost in the morass of sustainable development agendas. Mainstreaming and submerging could be close cousins.</p> <p>Biosecurity and controls on invasive species is also important to biodiversity, food security and peace. We consider this needs more explicit exposure, as do the links to climate destabilisation.</p>  |

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| 7      | 30      | We agree with the points made in para 30 about evidence, but note that “research” and “observations” rather than “science”-based is a better term. Traditional ecological knowledge may reflect keen observation over long time periods and should also form a part of biodiversity assessments.  |
| 7      | 31      | The emphasis in para 31 on implementation issues and reviews of actions plans, independent reporting of effectiveness of actions taken (not only by Parties) is essential.  |
| 7      | 32      | The use of meetings convened between now and 2020 is sensible, but bear in mind that for many civil society organisations, particularly the environmental NGOs, participation at biodiversity specific meetings is expensive and difficult to the point of impossible, and that keeping up with processes at other venues as well is often not possible.  |
| 8      | 33      | We agree that national processes are important. It is also important that there are some funds for NGOs to convene with other civil society organisations, academics etc to discuss matters independent of governments and their strategically used funding – if any.   |
| 8      | 34      | Review processes are essential – and these should include by civil society members, not only by governments themselves or officials from other countries. Diplomatic considerations and collusive refusals to blow the whistle on other governments are too likely to impede frank reporting.   |
| 8      | 35      | Voluntary commitments have a place – but verification and cohesion internationally are both important too. Too many voluntary commitments can end up being exercises in “smoke and mirrors” with debasement of the meaning of terms and commitments. External curation and reporting of voluntary commitments is still necessary.   |
| 9      | 36      | Agreed, but this could be expanded to include views from other entities than Parties.   |
| 9      | 37      | Fine, so long as “interim” commitments is not code for “able to be slithered out of”. The problem of lags is well worth addressing.   |
| 9      | 38, 39  | Overarching Principles – these seem good, but some resourcing will be needed to achieve the inclusivity.  |
| 10, 11 | 40      | <p>We agree with these activities but again, resources for all but the most wealthy ENGOs will be needed to enable participation, if only in support of costs.</p> <p>Leveraging networks such as the members and commissions of IUCN could be useful to achieve these goals. IUCN national committees, where these exist, and networks with convening power such as ECO NZ and our equivalents elsewhere could be used to reach into the community. Most of us work unpaid, so help with venue costs and fares and other such costs can make a huge difference to our ability to participate.</p> <p>In remote and/or far-flung countries – such as scattered island nations in the Pacific – costs of collaboration and meetings can be a huge barrier.</p> |
| 11     | 41      | <p>In New Zealand there has been little attempt by government to engage civil society in the CBD processes. As of late 2017 we have a new government and notably a well informed and motivated Minister of Conservation who comes from an ENGO background. We hope that there can be improved communications from the NZ focal point about CBD matters.</p> <p>A calendar of events is and would be very useful. Bear in mind though, that it can be far too expensive for many of us to get to international and regional events. Some form of inclusion of those who cannot make it or financial support is needed. Our experience is that poorly resourced first world voluntary organisations find it especially difficult to get to such meetings.</p>   |
| 12     | 43      | Such Reviews will be welcome. You’ve done a great job of avoiding acronym soup, but it will still be useful to provide an abbreviation glossary.  |
| 15-16  | Table 3 | We have not heard of the possible March 2018 New Zealand based Pacific Regional Capacity Development Programme. Is it happening? It would be useful if future versions on these event lists also included a URL or other means of further information.  |

