

**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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Comments on the draft proposals		
Page #	Para #	Comment
7	32	This paragraph should add that the calendar of events may include the schedule for publication of scientific assessments and other significant scientific/expert meetings relevant to the post-2020 framework.
8	35	<p>On the scope for encouraging nationally determined contributions, we think this approach has some merit but also some difficulties. It would enable Parties to say what they were going to do to meet those targets which are less SMART than others (eg current target 10) or enable Parties to define how they interpreted or planned to apply more quantitative targets, such as current target 15. Collated national commitments would also enable the Parties to see what cumulative commitments looked like and so identify gaps that needed more attention and provide an opportunity for some Parties to show leadership and ambition if they so desired. The difficulties/risks for Parties and others are in making commitments before the final targets are adopted (or doing so during the development of them). Early commitments may then need to be refined subject to the adoption of final targets.</p> <p>Contributions do not need to be just from Parties – businesses and other sectors could also be invited to do offer contributions (thus also requiring a different terminology than NDCs). This could also be a step towards mainstreaming. We also note the problems of establishing comparability between national commitments given differing national circumstances and opportunities, This implies a need for flexibility and transparency in any approach that is developed, whilst also seeking synergies between conventions.</p>

9	37	This paragraph seems to take a leap forward from views expressed in paragraph 35 to propose a schedule for submission of interim commitments prior to COP15. We would suggest discussions at SBI may be better facilitated if the paper for SBI sets out one or more options, including respective schedules which could be considered by COP14. This might also include the development of national commitments before and after COP15. Alignment of commitments to targets will be difficult if they are being developed simultaneously and will further politicise the discussion on targets. The point about time lags in implementation could also be addressed to some extent by continuity with existing targets and NBSAPs beyond 2020.
9	39	We think the principles in paragraph 39 are sound, especially with respect to being participatory and inclusive (and obtaining views from those not traditionally engaged in the work of CBD), and should be applied throughout.
10	40	As paragraph 32 above, elements of the preparatory process should include an opportunity for review and consideration of scientific assessments and analysis. Including through SBSTTA, and other external processes.
10	40	The activities described in paragraph 40, especially a and b, do not seem to follow the principles outlined in paragraph 39 entirely. For example, they refer to opportunities to provide views and have workshops by Parties and IPLCs etc and although they refer to involving 'stakeholders', we feel more emphasis should be given to other sectors, especially the private sector, academia and others, to ensure their full engagement in the process. Likewise in para 40.c, whilst we need to talk to the other biodiversity MEAs to achieve coherence between Conventions, if we are serious about mainstreaming and following the principles outlined earlier in paragraph 39, then the CBD Secretariat could also plan to engage in other relevant fora – such as the WTO and others from the non-biodiversity sector. We are unsure how discussions at other biodiversity MEAs will help 'indicate how the framework could facilitate mainstreaming' without engaging with those relevant sectors (and for Parties to do so internally with other parts of their government).
11	40	40.d Important – we believe much of this engagement with other sectors needs to be done at national level if it is to happen at all. We think there needs to be more emphasis on the essential role that Parties have here.
11	40	In the list of activities, we feel that there should be a stronger emphasis on business engagement.
11	42	Perhaps there should be more emphasis in paragraph 42 on the need to ensure involvement of all relevant focal points in the process (including from the Protocols).
11	43	43.d It may be worth emphasising the range of 'observers' who might contribute from <u>beyond</u> the traditional CBD / biodiversity community.
13	Annex	Table 1. October-December 2018 The first discussion paper should include a component on lessons learned from implementing the current strategic plan as outlined in the final part of paragraph 43. We need to know the lessons learned in the process as soon as possible in order to build on the elements that worked well and avoid repeating those things that worked less well.

0	Annex	<p>Table 1</p> <p>If there is a desire to invite NDCs (including contributions from sectors other than governments), and if the process is going to be genuinely iterative (paragraph 39.f) then the indicative chronology in Table 1 needs to enable Parties and other sectors to provide voluntary, indicative / provisional commitments at numerous other stages in the process and to revise them if they wish. For example, throughout 2019 wherever Parties and observers are invited to submit views, and when the draft post-2020 framework is made available for review in March 2020, that could also provide opportunities for provisions of NDCs . We assume that commitments would only become a genuine commitment at the leaders’ summit in September 2020.</p>
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0	0	<p>What seems to be missing is wider communication and reach-out to other sectors. But there really does need to be a drive to raise the profile and terms of the discussion. This is after all about the future of the living (Mother) earth for the benefit of everyone, including their economic prosperity and health.</p>
0	0	<p>The proposal should be clear where it applies to the Protocols to the Convention.</p>
0	0	<p>There are several references to the importance of synergies, but without ever using the word synergies. Perhaps this could be useful to include directly.</p>
		<p>Additional rows can be added to this table by selecting “Table” followed by “insert” and “rows below”</p>

Please submit your comments to secretariat@cbd.int or by fax at +1 514 288 6588 by **4 January 2018**