

**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**

Contact information		
Surname:	Harrison	
Given Name:	Jerry	
Organization:	UNEP-WCMC	
E-mail:	Jerry.Harrison@unep-wcmc.org	
Comments on the draft proposals		
Page #	Para #	Comment
0	0	We assume that the redrafted document will take account of relevant wording from SBSTTA recommendation XXI/1, and in particular paragraph 8 including its sub-clauses.
0	0	The whole of the section of “proposed preparatory process” carefully avoids use of prescriptive language, so there is no assumption made on whether there will be targets and/or milestones in the post-2020 global biodiversity framework. At one level this is OK, but it then leaves no place for principles that should be followed if targets and/or milestones are established. For example one such principle might be that as targets are developed consideration should also be given to how progress in achieving the target would be assessed, including through indicators. Such considerations would aid in ensuring the target was understandable and measurable, and at the same time work towards having a process for assessment of progress in place as soon as possible after agreement on the post-2020 global biodiversity framework.
0	0	A second issue that does not really come through because of the approach taken in drafting the final section on the proposed preparatory process is how to ensure that the post-2020 global biodiversity framework is scalable, and has traction and impact at all relevant levels. Hopefully this is achieved through involving all stakeholders, but it also may be a key principle that should be included. Support for addressing that principle would then come from national experience of developing targets based on the Aichi Biodiversity Targets when developing NBSAPs.
1	1	The text includes reference to the post-2020 global biodiversity framework “as a follow up for the next decade”. While this timing seems appropriate, we are not aware that a decision has yet been taken on the time period to be covered by the post-2020 global biodiversity framework.
1	3	The first part of the second sentence refers to the submissions received in response to the notification, while the third sentence refers to the note on which those submissions were based. In between is half a sentence relating to the experiences of preparing the Strategic Plan for Biodiversity 2011-2020. We assume this text will be reorganized.
2	7	While we entirely agree with the second sentence (starting “2020 will provide...”), we feel that it is misplaced in a section which is on the preparatory process followed in preparation of the current strategic plan.

2	9	While we entirely agree with the paragraph, we feel that it is misplaced in a section which is on the preparatory process followed in preparation of the current strategic plan, and this could be addressed instead within paragraph 20.
3	12	It might be appropriate to integrate paragraph 12 with paragraph 11, as it relates directly to the last two sentences, being part of the summarisation of issues and one of the key documents.
4	15	Reference should probably be explicitly made to decision XII/31. Currently the title and relevant content are referenced, but not the decision number.
5	17d	Currently this paragraph combines two different elements from decision XIII/27 in a rather confusing manner. The last two lines of this paragraph (starting “to explore options...”) does not refer to the Protocols but appears to do so from the text. We assume the paragraph can be reworded to address this.
5	18	The phrase “and many other Goals that include targets related to biodiversity” seems to rather understate the potential importance of biodiversity and ecosystem services for achievement of a number of goals and targets. We assume the paragraph can be reworded to address this.
5	18	Again the text makes reference to the post-2020 global biodiversity framework being developed “for the decade 2011-2020”. As said earlier, while this timing seems appropriate, we are not aware that a decision has yet been taken on the time period to be covered by the post-2020 global biodiversity framework.
5	18	The last sentence in the paragraph seems to understate the importance of refreshing the biodiversity-related SDG targets that only run to 2020. There is no obvious plan for addressing this within the SDG process, so there may need to be discussions on how to do this as the post-2020 global biodiversity framework is developed. This may be something that the COP should task the Executive Secretary with following up?
5	19	The word “agreements” at the beginning of the sentence is perhaps not correct, given the range of different mechanisms referred to. It would probably be better to refer to “agreed frameworks”, or “agreed mechanisms”. Perhaps even “internationally adopted frameworks” to emphasise their nature?
5	19	It might be worth also referencing the UN Strategic Plan for Forests 2017-2030 adopted last year by the special session of the UN Forum on Forests. This seems particularly relevant given the mainstreaming decision from COP 13, and also the link to UNFCCC and REDD+.
6	21	Referring to capacity building only in the context of national biodiversity strategies and action plans seems rather limiting, particularly in the context of a post-2020 global biodiversity framework for the Convention and its protocols. We would suggest deleting the words “for national biodiversity strategies and action plans”.
6	22	The words “in advance of the final agreement” should be deleted from here as this is not a part of the lesson that can be learnt from UNFCCC.
5-6	18-22	In the section on “Other Considerations” it might also be worth including a paragraph on the potential value of the post-2020 global biodiversity framework as a communications vehicle amongst different stakeholder groups, and through this mechanism alone a further stimulus for action. This would be consistent with decision XIII/22 on the framework for a communications strategy.

7	30	One of the points made in our earlier submission could be included in this paragraph. Reference is already made to informing development of the post-2020 global biodiversity framework through a review of the NBSAPs. We would go further and suggest that we need to learn lessons from the experience of Parties in taking the Aichi goals and targets and trying to understand and address them within their own contexts as they develop their own national targets. With regard to the latter point, the submission on behalf of the Biodiversity Indicators Partnership also made reference to the wording of some of the global targets being difficult to adapt to national or sub-national targets
8	34	In this paragraph indicators are referenced, however this section omits a key point made in our comments, and in those from the Biodiversity Indicators Partnership. While the availability of indicators should not drive development of the post-2020 global biodiversity framework or the goals/targets within it, consideration of potential indicators at the same time as developing the framework should help in developing SMARTer targets, and in exploring their scalability.
9	36	Presumably the last sentence should refer not only to the views of Parties, but also to the views of other stakeholders including MEA secretariats, UN entities, and so on.
9	36	In fact the final sentence of this paragraph is quite significant. We assume that key points for action like this one will all be picked up by the Secretariat when the “Draft Recommendations” are prepared.
9	37	This paragraph addresses two important issues which should probably not be combined in this manner without further discussion. These issues are: development of NBSAPs that address the post-2020 global biodiversity framework; and some form of “nationally determined contributions”. Would it not be better to: (a) recognise time lag as an issue (which you already do); (b) ask the Executive Secretary to compile views on how this can be effectively addressed; (c) propose as one potential mechanism the development of some form of “nationally determined contribution” in such a manner that this can be discussed by SBI.
9	37	Another approach before agreement on the post-2020 global biodiversity framework to address time-lag concerns might be to provide guidance and encouragement to Parties on national assessments and national multi-stakeholder analysis on progress to current NBSAP targets and understanding the role of biodiversity and ecosystem services in addressing the SDGs. These ‘preparatory activities’ will help Parties in preparing for the post-2020 global biodiversity framework in whatever form it takes, and meanwhile they would also be relevant to addressing the Aichi Biodiversity Targets.
9	37	The last sentence of this paragraph refers to the proposed summit meeting. Rather than have first mention of the proposed summit at the end of this paragraph, it would seem more appropriate to have a separate paragraph on the summit and how it could potentially be used to give added impetus to discussion and decision on the post-2020 global biodiversity framework, and presumably also stress its importance in the context of the other global processes referred to in paragraphs 18 and 19. This then needs to be linked in the draft recommendation to a request to the Executive Secretary to explore this opportunity further.
10	39d	It might be worth explicitly referring to both natural and social science in this subparagraph, so that it is absolutely clear that there are social science elements to the knowledge base that is needed.
10	39d	The word “realism” should be replaced by “feasibility”.

11	40d	Not entirely clear from this subparagraph is what is covered by the terms “public inputs” or “communication activities”. We take it to also include targeted communication to different stakeholder groups, including – for example – reaching out to scientists through journals and/or scientific meetings.
11	40e	Add the phrase “that are relevant to supporting development of the post-2020 global biodiversity framework”.
11	40g	Should reference not also be made to the governing bodies of the protocols?
11	41	It might be more appropriate to place this paragraph in its own subsection after the subsection on key information sources, as both the activities and the key information sources provide the inputs for the documents drafted by the secretariat.
11	41	A significant number of inputs are identified in paragraphs 40 and 43, but at this stage no real advice is being given on how all of these inputs will be shaped into the desired output. To a large extent this is a content issue, but you may want to also seek advice on this aspect from Parties and observers when the Executive Secretary seeks views on focus and scope (as referred to in the last sentence of paragraph 36).
12	43f	In addition to the global and regional assessments of IPBES, reference should also be made to the thematic assessments.
12-13	43a-h	The list of sources should also include “outputs from meetings organized by others relevant to development of the post-2020 global biodiversity framework”, making this list consistent with paragraph 40e above. This will include, for example, identification of a range of types of evidence which is being discussing in the context of the expert meeting being planned by the Cambridge Conservation Initiative with the support of the UK Government and UN Environment, and in cooperation with the CBD Secretariat.
12	43	Much of the paragraph after the list of sources seems to deal with ‘content’ issues rather than ‘process’ issues, and should probably be shortened to address this. Alternatively add a final point to the list “other reviews and analyses including”, and then have a number of these as sub-items.
12	43	The final sentence starting “the discussion documents would...” seems to belong more with the current paragraph 41 rather than here?
13	Table 4	The meeting organized by the Zoological Society of London is taking place 27-28 February, and is concerned with <i>Safeguarding space for nature and securing our future: developing a post-2020 strategy</i>
13	Table 4	The meeting organized by the Cambridge Conservation Initiative is taking place 10-12 April, and is concerning <i>Framing the future for biodiversity: Effective use of knowledge in developing the post-2020 global biodiversity strategy</i>