

**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	
<p><b><u>General comments</u></b></p> <p>WWF welcomes the “Proposal for a comprehensive and participatory process for the preparation of the post-2020 global biodiversity framework” prepared by the SCBD and praises the SCBD for the integration of the first round of consultations in September 2017. WWF looks forward to continuing its engagement in this process to prepare an ambitious post-2020 global biodiversity framework and would like to share the following general comments for consideration:</p> <ul style="list-style-type: none"> <li>• WWF remains alarmed about the <b>limited progress to meet the Aichi Biodiversity Targets</b> up until now and believes that existing work to strengthen implementation and review could be further strengthened. Business as usual scenarios will not prevent the ongoing and rapid decline of biodiversity loss leading to the forecasted 6th mass extinction.</li> <li>• <b>The post-2020 global biodiversity framework must be far more ambitious to stop and reverse the degradation of nature and address its underpinning causes.</b> The level of ambition of the new framework cannot fall behind the Aichi Biodiversity Targets nor of any other existing frameworks, such as the 2030 Agenda or the Paris Agreement, among others. The new global biodiversity framework must address this urgency and set the world, as well as individual countries, on track to value, conserve and restore biodiversity and ecosystems.</li> <li>• We welcome the recognition of the <b>2030 Agenda for Sustainable Development as an integrated framework</b> to promote biodiversity conservation and sustainable use. The proposal points out at direct linkages between the Aichi Targets and the SDG biodiversity-related targets with a 2020 timeline which will expire in 2020. WWF calls on the CBD to explore how to best <b>ensure alignment between the two frameworks</b> in light of the adoption of the post-2020 biodiversity framework.</li> <li>• WWF urges to better align and integrate the post-2020 global biodiversity framework and the UNFCCC agenda, as well as that of the Convention on Combating Desertification. <b>Aligning targets and common indicators</b> as well as effective resource mobilization mechanisms are important means and represent an opportunity to strengthen this cohesion and global coherence.</li> <li>• WWF emphasises that <b>upstream planning and integrating the conservation and sustainable use of biodiversity into relevant development and economic decisions, sectors, planning processes and policies</b> is critical to address key drivers of biodiversity loss and increase potential benefits to biodiversity.</li> </ul>	

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4	15	<p>Ensure that the development of the post-2020 global biodiversity framework is supported by the development and adoption of an ambitious resource mobilization strategy. WWF believes that this must be a complementary part of the new global biodiversity framework in order to enable and enhance implementation and suggests the following text changes in §15:</p> <p><i>“Accordingly to [...] and related means of implementation, including <b><u>the development of a complementary and ambitious</u></b> resource mobilization <b><u>strategy as a critical element to enable and ensure implementation</u></b>.”</i></p> <p>In this context, WWF recommends that:</p> <ol style="list-style-type: none"> <li>1) The new framework is fully and convincingly financed through domestic public resources via national budgets, development and strategic economic planning, as well as bilateral and multilateral development cooperation;</li> <li>2) Incentives are provided for sustainable use of natural resources and subsidies harmful to biodiversity are eliminated immediately;</li> <li>3) Private sector finance and investment flows towards conservation and sustainable use of biodiversity and ecosystems must be stimulated. Therefore, Parties should set the right framework conditions for pro-biodiversity investment, green bonds, natural infrastructure investment and other innovative financial mechanisms by the private sector.</li> </ol>
5	18	<p>CBD Parties should call on the Executive Secretary at SBI-2 in July to send out a clear message to the President of the High Level Political Forum (HLPF) in 2018, stressing the importance of aligning the content and ambition of the 2030 Agenda with the CBD post-2020 global biodiversity framework. The CBD has the mandate to agree on the post-2020 global biodiversity framework and should ensure that the decisions taken in 2020 will be properly integrated into the 2030 Agenda and those SDG targets expiring in 2020, without lowering in any way the ambition of the 2030 Agenda (e.g. by establishing an ad hoc working group composed of CBD and SDGs experts to explore how to best align the two frameworks).</p>
5/7	19/27	<p>Ensure the development of shared biodiversity indicators across other international frameworks, including the SDGs, the UNFCCC Paris Agreement and the UNCCD among others, to avoid duplication, promote measurability and effective implementation of all the international objectives, and to facilitate the mainstreaming of biodiversity in other processes. The development of such indicators should be complementary to the development of the post-2020 global biodiversity framework and the resource mobilization strategy suggested in §15, in order to avoid any delay in implementing and measuring progress towards the achievement of the new post-2020 framework.</p>
6	21	<p>Establish a strong accountability mechanism to measure progress in implementing the new post-2020 biodiversity framework (e.g. follow up and review mechanism or a peer review process, as further elaborated below for paragraph 34) as well as any other international frameworks that integrate biodiversity by putting in place biodiversity-related measures. The implementation of the CBD Strategic Plan has the opportunity of being supported by other international frameworks, such as the 2030 Agenda on Sustainable Development and the Paris Agreement, which integrate biodiversity elements across their objectives.</p>
6	22	<p>Include the involvement of non-state actors as key catalyzers of and contributors to the long-term ambition of their countries among the useful lessons from the experience under UNFCCC.</p>

6	24	<p>The CBD should rally around a simple and clear scientific message comparable to the “1.5°C scenario” for UNFCCC and the IPCC “scenarios” to halt biodiversity loss by 2030 and to restoring biodiversity in order for to enter a safe operating space for people and the planet for future generations. Such a message could be framed as “half world in natural state for a living planet” for example.</p> <p>The goals and targets of the post-2020 global biodiversity framework must address the urgency and set the world as well as individual countries, on track to value, conserve, sustainably use and restore biodiversity and ecosystems services.</p>
6	25	WWF supports the idea of biodiversity champions or ambassadors in order to carry out the messages to the general public and to encourage schools, universities, youth groups and others to mobilize their wider communities to take action to value, conserve, sustainably use and restore biodiversity. WWF encourages Parties to join its efforts and accelerate awareness raising in the remaining 3 years of the current strategic plan in order to lay the ground for effective, immediate and wide-reaching action post-2020.
7 10	26 40b	Enable the meaningful participation of experts, from scientific and other institutions, on matters related to other field than the environmental (e.g. social, economic, finance, technology, etc), including indigenous and local experts, in order to foster and enhance the discussions on how to mainstream biodiversity in other sectors while ensuring the broad inclusion of the post-2020 biodiversity framework.
7	29	WWF underlines once more the critical role that GBO-5 must play in triggering urgent action by governments, the private sector, financial institutions as well as civil society to start reversing the trends of biodiversity loss by 2030. The upcoming IPBES thematic, regional and global assessments should be key to inform and develop the new Strategic Framework.
7	30	WWF strongly supports this paragraph, the new Strategic Plan must be based and informed by different science based sources of information (like IPBES, GBO-5, IPCC, etc.) as well as traditional knowledge. Especially the IPBES Expert Group on Models and Scenarios should continue its work of developing a new set of multi-scale biodiversity scenarios, which outline what business-as-usual would mean not only in terms of biodiversity loss, but also in terms of social and economic risks and losses, additional health costs and increasing investment risks.
7	32	WWF strongly supports to use of various other meetings to discuss the post 2020 global biodiversity framework. WWF suggests a high-level event on nature and biodiversity, organized by the UN Secretary General in 2019 at the HLPF on Heads of State level.
8	34	<p>A strong and effective peer review mechanism is key to monitor progress of national implementation of the new CBD Strategic Plan. This mechanism should include peer-reviews as well as the views of all stakeholders and rights holder, including IPLCs. Comparing the effectiveness of policy instruments has been challenging in the past. A transparent and effective review would also benefit from technology and innovative research (e.g. remote sensing, drones, new technology like blockchain, etc.).</p> <p>Furthermore, the CBD Secretariat should invite businesses, industry, financial institutions and civil society to regularly showcase to the COPs how they are contributing to the implementation of the CBD objectives, and to report on the challenges they encounter. Innovative mechanisms, business models and other approaches that contribute to this implementation could be presented, including how impacts are measured.</p>

8	35	<p>WWF sees some advantages to a system similar to the UNFCCC's nationally determined contributions (NDCs), in particular the 'ratcheting up' mechanism. The NBSAPs already outline countries' action plans but should be complemented with an NDC-type pledge and review mechanism that aims to increase national ambition over time to meet the levels of action required, based on scientific analysis. The IPBES and the authors of the GBO-5 should provide clarity on the action required and guidance on the gap to be closed during this pledge and review cycles.</p> <p>The development and collection of national voluntary commitments related to biodiversity must be supported by a strong follow up and review mechanism which can ensure accountability towards the commitments made and monitor their effective implementation.</p> <p>Furthermore, different review processes such as NBSAPs, NDCs, and the SDGs follow up and review mechanism among others, should inform each other in order to foster policy coherence and increase the coordination and effectiveness of the different implementation processes.</p>
8-9	36	<p>Not only submissions from Parties and observes, but also submissions from other stakeholders and rights holders, including IPLCs, on the process for developing the post-2020 global biodiversity framework should be collected prior to COP-14, CP COPMOP-9 and NP COPMOP-3.</p> <p>WWF supports the proposal that at its second session the Subsidiary Body on Implementation (SBI-2) requests the Executive Secretary to start collecting and synthesizing, prior to COP-14 and in an open and transparent manner, views and concrete proposal from Parties as well as other stakeholders and rights holders, including IPLCs, on the focus and scope of the post 2020 global biodiversity framework.</p>
9	37	<p>WWF supports that SBI recommends COP-14 to invite Parties to submit their national "interim" commitments in line with the 2050 Vision for Biodiversity. It is critical to implement any new global biodiversity framework as soon as it is adopted. In light of the magnitude of biodiversity loss globally, countries must live up to their commitments under the CBD.</p>
9-10	38-39	<p>WWF welcomes the "Overarching Principles" outlined in §38 and fully supports the six additional principles from the Submissions proposed in §39.</p>
10	40a	<p>WWF welcomes this paragraph and encourages Parties to pay particular attention to the issue of fair and equitable participation. Stakeholder involvement (including businesses) is key if biodiversity is integrated in planning, economic policies and investment frameworks. Many stakeholders have a vital role in the protection, use and management of nature, biodiversity and its ecosystems, and rely on them for their social, cultural and economic well-being. This is particularly true for the poorest and most vulnerable groups, including IPLC. Ensuring the fair and equitable participation and consultation of these actors is of utmost importance and needs to be reflected in the post-2020 global biodiversity framework and the process towards its development to secure not only an ambitious outcome but also one that is grounded into economic and social development plans, local/city development strategies and integrated with Nationally Determined Contributions for addressing climate change.</p> <p>Furthermore, it would be essential to mobilize not only CBD Parties, but also non-governmental organizations, civil society, the private sector, and local authorities. Like-minded groups, bodies or organizations should be invited to rally, gather and announce share commitments towards biodiversity goals. These partnerships would together form a Global Biodiversity Action Agenda which could complement other international frameworks, such as for example the global Climate Action Agenda.</p>
10	40b	<p>In addition to regional and global workshops it should also be considered to organize expert sectoral workshops on specific issues or work streams as needed.</p>

11	40 f	<p>Commitments outside the Ministry for Environment are equally important. Parties and the SCBD should organize High-Level meetings, such as a Biodiversity Heads of State Summit in the lead up to 2020, to discuss strategic elements, foster timely political commitment and raise awareness for the new CBD Strategy.</p> <p>Opportunities should be explored to organize such meetings in coordination with other international processes (e.g. during the HLPF 2019 to be convened at the Head of State level during the 74th session of the UN General Assembly).</p> <p>The organization of Regional High-Level Biodiversity Summits should also be considered, similarly to the initiative of the Government of Egypt to hold an Africa Biodiversity Summit ahead of CBD COP-14.</p>
11	40g	Broadening the formal consideration to also include technical expert groups and other traditional working and expert bodies under the CBD.
11	41	The discussion documents to be prepared and updated by the SCBD to summarize the views and guide further discussion and review by Parties, observers, should also include the views of other stakeholders and rights holders, including IPLCs, and be timely developed through an inclusive, open and transparent consultation. A review process must also be ensured.
11-12	43	<p>The list should also include an additional information source:</p> <p>i) Relevant documents and programmes of other MEAs and international and regional processes (e.g. CITES is developing a strategic vision to 2030).</p>
11	43d	Stakeholders and other rights holders, including IPLCs should be included.
13	Table 1 Annex	<p>This indicative chronology of key activities leading to the consideration of the post-2020 global biodiversity framework should also include steps towards the development of a resource mobilization strategy as well as shared indicators as per WWF's suggestions under §§15 and 19/27 above. In particular, SBSTTA-23 should have a bigger mandate for the development of the post-2020 framework then just within GBO and IPBES discussions. Both SBSTTA-23 and SBSTTA-24 must focus on the new post-2020 framework, including the mobilization of resources strategy and the indicators framework.</p> <p>Furthermore, in line with WWF's recommendation made under §18 above, the HLPF 2018 taking place on 9-18 July 2018 should be added to the timeline as a key date leading to the consideration of the post-2020 global biodiversity framework and suggests to add the following as activity:</p> <p><i>“The Executive Secretary to send out a clear message to the President of the High Level Political Forum (HLPF), stressing the importance to ensure the full alignment of the 2030 Agenda with the CBD post-2020 global biodiversity framework, particularly with regards to the SDG targets expiring in 2020 which integrates elements of the Aichi targets.”</i></p>
16	Table 3 Annex	WWF suggests to also add the 2020 Oceans Conference (Portugal suggested to host it) to the timeline.

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