

With the failure of the Aichi Targets to stem the tide of biodiversity loss, it is critical that the Post-2020 Global Biodiversity Framework (GBF) results in transformational change across society to halt and reverse nature loss so that we are nature-positive, where nature is visibly and measurably on the path of recovery, by 2030. BirdLife welcomes the publication of Draft 1 of the framework, which will be the basis for discussion at the Convention on Biological Diversity (CBD) Open-Ended Working Group III (OEWG-III) in August 2021. This is the first update to the language of the goals and targets for nearly a year, and we are glad to see momentum picking up again.

Key priorities for the Post-2020 Global Biodiversity Framework

The framework must have a clear mission, to halt and reverse nature loss to reach nature-positive by 2030, underpinned by ambitious, science-based outcome goals and action-orientated targets, that:

1. Safeguard the diversity and recover the abundance of life
2. Retain and restore natural ecosystems and key areas for biodiversity
3. Transition towards an equitable nature-positive economy
4. Ensure robust implementation by and for all of society.

For BirdLife, this requires that the GBF places species and ecosystems, as key elements of biodiversity, at its core and ensures that nature is fully integrated and mainstreamed into country and company policy, finance, planning and implementation. It must be fully resourced, be underpinned by an accountable and transparent implementation mechanism, including via a rights-based approach, and be intrinsically aligned with the wider nature (including oceans), climate, and sustainable development agendas. See our priorities for the framework (based on Draft 0.5) [here](#).

BirdLife's initial reactions

While we note some good improvements from Draft 0.5, including the addition of a new target focused on restoration, strengthened language and safeguards relating to human rights and IPLC rights, and quantitative targets to address the biodiversity finance gap, other elements have regressed and the overall ambition of the framework should be far stronger. In some cases, the updated language - particularly on the Mission and species components - is a weakening of the level of ambition. Crucially, the draft does not match up to the ambition of recent commitments such as the Leaders Pledge for Nature and the G7 2030 Nature Compact. As Parties react to the draft and prepare for negotiations at OEWG-III, it is vital that as consensus is built so the framework continues to improve rather than being watered down.

On the Mission

- **A more complicated 2030 Mission and less ambitious theory of change:** While we can see that effort has been made to better articulate the three objectives of the Convention, we need a much clearer and concise mission statement to galvanise ambitious, concerted action. Concerningly, the footnote stating that the mission "implies the need for a stabilization in the rate of loss of biodiversity" greatly reduces the ambition of the framework. We need to *halt and reverse* biodiversity loss by 2030, and not settle for a steady rate of loss. The theory of change has been similarly weakened, with an aim to "stabilise trends that have exacerbated biodiversity loss" by 2030, with the word "exacerbated" being highly misleading and incorrect: these are the trends that have *created and driven* biodiversity loss, not added to and exacerbated it.

Species

- **Far weaker species components:** the updated language of the species elements within Goal A have been both unnecessarily complicated and watered down. There is now a focus on halting "the increase in the extinction rate", an insufficient commitment to reduce extinction risk by 10% (our [species position](#) advises at least a 20% reduction) and the ambitions for the recovery of species have been severely weakened (including a loss of a SMART element and any assessment of species abundance in the headline indicators proposed). We also believe that the scope of Target 4 on active species recovery actions is now too wide and confusing due to the inclusion of genetic diversity provisions and the remaining clause on human-wildlife conflict which is unrelated to promoting recovery action.

BirdLife International is the world's largest nature conservation partnership, with 115 partners. Through our unique local-to-global approach, we deliver high impact and long term conservation for the benefit of nature and people.

For more information, see www.birdlife.org/post2020 or contact:

- Dr Amy McDougall, Global Biodiversity Policy Coordinator, BirdLife International (amy.mcdougall@birdlife.org)
- Dr Noëlle Kumpel, Head of Policy, BirdLife International (noelle.kumpel@birdlife.org)

Ecosystems

- **A new target on restoration (Target 2):** We welcome the inclusion of a new target which sets a restoration commitment of at least 20% of degraded freshwater, marine and terrestrial ecosystems, with a focus on priority ecosystems and enhancing connectivity. However, in order to effectively address biodiversity loss and climate change and considering the lack of consensus and harmonised data in defining 'degraded ecosystems', this commitment should be based on a proportion of the overall global land and sea area and implemented with a view to restore natural habitats and connectivity in conjunction with targets 1 and 3.
- **A retained 30x30 protected/conserved area target (Target 3):** We are pleased to see "areas of particular importance for biodiversity" more upfront in this target, but strongly recommend that this should include explicit mention of Key Biodiversity Areas (KBAs).
- **No mention of Key Biodiversity Areas (KBAs) in the ecosystem components:** The framework still fails to acknowledge the key contribution that KBAs make in ecosystem conservation and the global priority for their conservation. Goal A and Targets 1, 2 and 3 must be refined to ensure we retain and restore "KBAs and other areas of particular importance for biodiversity".

Mainstreaming

- **A SMARTer climate mitigation target (Target 8):** We welcome the inclusion of a stronger target that focuses on minimising the impact of climate change on biodiversity through mitigation and adaptation quantifies the contribution of ecosystem-based approaches to mitigation (i.e. at least 10 GtCO₂e/year which is in line with [this research](#)) and acknowledges that mitigation and adaptation must not be at the expense of biodiversity. However, we note that all references to nature-based solutions have been removed, putting sole emphasis on ecosystem-based approaches. This is a step backwards, making connections to the UNFCCC agenda less explicit.
- **Requirement for businesses to assess and report on dependencies and impacts on biodiversity (Target 15):** this target has been improved in line with calls from various stakeholders, though elements still require refining.
- **Poor representation of tackling the pressures and drivers of loss:** The draft still lacks specifics on actions for key sectors¹ that are responsible for driving biodiversity loss. For key sectors to understand and engage with the framework, it is vital that it is made clear where their contribution is expected. For example, Target 5 on harvesting, trade and use is an example of lack of reference to the primary industries responsible. The merging of all harvesting into one target (covering both commercial and subsistence levels) means that some of the detail is lost.
- **Failure to address the perverse impacts of use:** The draft still fails to acknowledge and address the perverse associated impacts that harvest/use/trade can have on non-targeted species, for instance, through bycatch. There needs to be clear reference to effective regulation to ensure these practices are sustainable, legal and safe.

Implementation

- **Weakened implementation elements:** The language on responsibility and transparency is short and vague, and there is a risk that the implementation mechanism may be moved from the GBF entirely and into another decision to be adopted at COP15 or even at COP16. This would hamper the chances of successfully and rapidly implementing the GBF on the ground. Countries need to align their national targets with the ambition of the new global framework and more standardised NBSAPs and national reports are essential for effective accountability. There is a lot of detail to work through to make the implementation mechanism as effective as it must be. It is essential that we don't shy away from this challenge by allowing key decisions to be delayed beyond the GBF adoption.
- **Quantified financial commitments to implement the framework:** We are pleased to see Goal D make an explicit reference to closing the biodiversity finance gap, quantifying the amount of financial resources needed (i.e. at least US\$700 billion/year), as well as specific financial targets in both Target 18 and Target 19 to address harmful subsidies and increase international financial flows to developing countries. While these numerical values are essential to effectively track progress on resource mobilisation, we stress that these values are conservative estimates of what is needed and should be increased to effectively address the biodiversity finance gap.
- **Stronger provisions for the rights and contributions of Indigenous People and local communities throughout the framework, but the right to a healthy environment still lacking:** Several targets now include clear human rights provisions. Both Targets 13 and 20 acknowledge free, prior and informed consent as prerequisites in access and benefit-sharing and knowledge sharing. Target 21 also specifically refers to the respect of IPLCs' rights over lands, territories and resources which is essential to ensure a right-based approach in the GBF. However, given the increasing global calls including within the UN, we would like to see the recognition and implementation of the right to a healthy environment also included in Target 21 as well as Goal B, reflecting its fundamental importance across the framework.

¹ The key sectors listed by the CBD CoP13 Decision XIII/3 are agriculture, forestry, fisheries and aquaculture, tourism, energy and mining, infrastructure, manufacturing and processing, and health.