

BirdLife International Priorities for the Post-2020 Global Biodiversity Framework

(August 2021)

Proposals on Goals, Targets, Components & Indicators

The planet is facing a deep and long-term crisis rooted in a number of interconnected global challenges which are now greater than ever – a triple health, biodiversity and climate planetary emergency. 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.

The GBF must place species and ecosystems, as key elements of biodiversity, at its core and ensure that nature is fully integrated and mainstreamed into country and company sustainable development plans. It must be fully resourced, be underpinned by an accountable and transparent implementation mechanism and be intrinsically aligned with the wider nature (including oceans), climate, and sustainable development agendas.

BirdLife welcomes the publication of Draft 1 of the framework; this is the first update to the language of the goals and targets for nearly a year. However, while we are glad to see momentum picking up again, there is much more work to be done to ensure that this framework includes fully 'SMART'¹ goals and targets that will enable us to achieve the transformational change that is required. We are especially concerned about the changes to the species-related goal, as without a SMART target on species abundance and extinction risk, the mission to recover nature, and bend the curve of biodiversity loss with transparency, is undermined. Furthermore, ambition has been lost in the updated 2030 Mission and theory of change, and the draft does not match up to the higher ambition of other international pledges such as the Leaders Pledge for Nature, and the G7 2030 Nature Compact.

This document provides BirdLife's reflections on Draft 1 (which includes updates to the '0.5 Draft' goals and targets). This includes providing overarching messages on BirdLife's key asks for the post-2020 Global Biodiversity Framework, alongside more detailed comments on the Goal and Target language, Headline Indicators, and where relevant some Component and Complementary Indicators.

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

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¹ SMART is defined as Specific, Measurable, Ambitious, Realistic, and Time-bound, to which we add Unambiguous and Scalable (Green et *al* (2019) <u>Relating characteristics of global biodiversity targets to reported progress</u>, Conservation Biology, 33 (1360-1369))

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Key overarching messages

This first draft of the Global Biodiversity Framework builds on the 0.5 Draft and discussions at SBSTTA24 and SBI3 on scientific, technical and implementation aspects. While we note some good improvements, the increase in ambition needed to close the gap between what is needed to halt biodiversity loss and what is tabled through the GBF has not materialised and there has been a significant loss of clarity. Though there are positives from which we can build, we must bridge this ambition gap if we are to realise the 2050 vision.

The Mission

The mission of the Global Biodiversity Framework must clearly and simply articulate that we must not only halt the loss of biodiversity but start to recover it by 2030, in order to ensure full recovery by 2050. It must also focus on this as the outcome we want to see, with urgent action across society being a means to achieve this rather than an end in itself. The current wording of the mission does not meet this need and should be improved to galvanise ambitious action. This ambition of being 'nature-positive' by 2030 must translate into goals that deliver net gain of biodiversity at the ecosystem, species and genetic level. This means ensuring the following:

Ecosystems and sites of importance for biodiversity

We agree that strong goals and targets are needed on ecosystem retention AND restoration including the effective conservation of all Key Biodiversity Areas (KBAs), and connecting and integrating networks of KBAs into wider freshwater, coastal, marine and terrestrial ecosystems.

- We welcome the inclusion of a **new target on restoration (Target 2)** 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, 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.
- We are glad to see a **retained 30x30 protected/conserved area target (Target 3)**, with "areas of particular importance for biodiversity" more upfront, but strongly recommend that this should include explicit mention of Key Biodiversity Areas (KBAs).
- We are **concerned about the lack of mention of Key Biodiversity Areas (KBAs)** in the ecosystem components more widely: The framework still fails to acknowledge the key contribution that KBAs make in both ecosystem and wider biodiversity conservation and the global priority for their conservation. Goal A and ecosystem targets 1, 2 and 3 must be refined to ensure we retain and restore "Key Biodiversity Areas and other areas of particular importance for biodiversity"

Species

We must adopt clear species outcomes and actions to ensure we are nature-positive by 2030. The inclusion of commitments on species is critical, given they are fundamental units of biodiversity, the building blocks of ecosystems, are relatively well monitored and have substantial public resonance. Therefore, we are very concerned about the far weaker species components in this draft.

• The **updated language of the species elements within Goal A lacks ambition**, making it both unnecessarily complicated and serving to water down commitments. Halting "the increase in the

extinction rate" is insufficient, as are the commitments to reduce extinction risk. The elements relating to species abundance have been considerably weakened, with low ambition of simply "maintaining" abundance and no SMART milestone. Without this, the mission to recover nature, and bend the curve of biodiversity loss with transparency, is undermined.

 The scope of Target 4 on active species recovery actions should focus on implementing targeted intensive recovery actions for those species for which addressing threats (which is covered by other action targets) may not be sufficient to bring these species back from the brink. It is now too broad and unfocused with the inclusion of domestic species and genetic diversity provisions and the retention of the clause on human-wildlife conflict.

Mainstreaming

We need strategic, pre-emptive, biodiversity-inclusive spatial planning and policies that integrate nature and nature-based solutions into country and company sustainable development plans to guide where biodiversity is conserved as a key element of mainstreaming. This must cover 100% of national territories, coordinated at an ecologically-relevant scale. These should reflect and as far as possible integrate the Sustainable Development Goals (SDGs) and other global commitments like the Paris Agreement, to recognise the contribution of biodiversity in sustainable development, climate mitigation, adaptation, and disaster risk reduction. Mainstreaming needs to be given greater prominence throughout the framework by adopting references to key sectors,² sector-specific terminology and indicators. These elements should create the enabling conditions needed to foster co-ownership and co-responsibility across sectors and cultivate co-ordinated biodiversity governance via a multi-actor and distributed responsibility approach.

- We welcome the inclusion of a **stronger**, **SMARTer climate mitigation target** (**Target 8**) that focuses on minimising the impact of climate change on biodiversity as well as recognising the potential contribution to mitigation and adaptation of biodiversity. However, we note that all references to nature-based solutions have been removed, putting sole emphasis on ecosystem-based approaches and making connections to the UNFCCC and other related agendas less explicit. The recognition and facilitation of synergies across the biodiversity, climate and development agendas within these frameworks is fundamental to their effective and holistic operationalisation.
- We welcome the **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 there are elements that still require refining.
- We are concerned about the **poor representation across the framework of sectors that are drivers of biodiversity loss**. The draft still lacks specifics on actions for key sectors² that the CBD has identified as 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.
- We are concerned about the **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 minimises health risks.

² The key sectors required for biodiversity mainstreaming as listed by CBD CoP13 decision XIII/3 are agriculture, forestry, fisheries and aquaculture, tourism, energy and mining, infrastructure, manufacturing and processing, and health.

Implementation

A large part of the reason for the failure to meet the majority of the Aichi Targets is the lack of a clear implementation plan to achieve them. The plan needs to be actively implemented both at national level and beyond through international cooperation, tracking progress via a core set of indicators and a robust accountability mechanism, and adequately resourced, including through placing nature at the heart of economic systems. Each target needs a clear, adequately resourced implementation plan, including milestones to 2030. There is a critical need for a stronger implementation mechanism and concrete commitments on resource mobilisation to be developed in advance of the start of the implementation period.

- We are very concerned about the **weakened implementation elements** in this draft: 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.
- We welcome 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. The role of the finance sectors in addressing the biodiversity finance gap and harmful subsidies should also be clearly defined.
- We welcome stronger provisions for the rights and contributions of Indigenous People and local communities throughout the framework: 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 rights-based approach in the GBF.
- We would like to see the recognition and implementation of **the right to a healthy environment** integrated holistically across the framework as fundamental to its success, with its specific mention in relation to nature's contribution to people (under Goal B and explicitly under Milestone B.1) as well as in relation to rights (under Target 21 in relation to the recognition of the right in national laws and constitutions).

Detailed commentary on BirdLife's priorities for the post-2020 Global Biodiversity Framework

BirdLife has four key priority asks for the Post-2020 Global Biodiversity Framework: i) on ecosystems and sites of importance for biodiversity - to effectively and equitably retain and restore key areas for biodiversity and ecosystem services, ii) on species - to prevent extinctions, recover wildlife population abundance and safeguard the diversity of species, iii) on mainstreaming – to value and integrate biodiversity across all sectors and wider society, and iv) on implementation – to actively implement the framework both at national level and beyond through international cooperation, with progress tracked via a core set of indicators, adequate resourcing, and underpinned by a comprehensive, transparent and accountable monitoring, reporting and verification (MRV) process. Therefore, the focus of this paper is the goals and targets related to these, as follows:

- On ecosystems and sites of importance for biodiversity: Goal A, and Targets 1, 2 and 3
- On species: Goal A, Targets 4 and 5.
- On mainstreaming: Goal B, Targets 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, and 18.
- On implementation: Goal D, Targets 18, 19, 20, and 21

It is structured as a series of standalone positions to allow easy reference by the Mission, goals and each individual target.

Commentary on the 2030 Mission and Theory of Change

The 2030 Mission needs to be a clear headline statement that sets overall ambition and direction of travel for the decade - conditions which are not met in the current Mission. While an effort has been made to better articulate the three objectives of the Convention, a much clearer and more concise statement is needed to galvanise ambitious and concerted action to halt and reverse the decline of biodiversity. While the current focus on action is welcome, this needs to deliver a strong outcome, so we also suggest to refocus from the means ("urgent action") to the end ("nature-positive by 2030").

By pushing the reference to "putting nature on a path to recovery" to the end of the sentence, the emphasis is now placed on the utility of biodiversity to humans, rather than nature's recovery for the benefit of all. There is a risk that this vital element is lost if the mission is shortened for communication purposes, and we strongly recommend the order is reversed. This is compounded in the Mission footnote³ and accompanying theory of change⁴ with both emphasising the need for a stabilisation in the rate of loss rather than to *halt and reverse* biodiversity loss by 2030, which is the level of ambition needed if we want to bend the curve and see nature's recovery to achieve the 2050 Vision to "live in harmony with nature".

Current text

To take urgent action across society to conserve and sustainably use biodiversity and ensure the fair and equitable sharing of benefits from the use of genetics resources, to put biodiversity on a path to recovery by 2030 for the benefit of planet and people.

Recommended text

For communication purposes

To **achieve a nature-positive world** by 2030 for the benefit of planet and people, **by** taking urgent action across society to **halt and reverse biodiversity loss**.

Full text

To **achieve a nature-positive world by 2030** for the benefit of planet and people, **by** taking urgent action across society to **halt and reverse biodiversity loss**, sustainably using biodiversity and ensuring the fair and equitable sharing of benefits from the use of genetic resources.

- Add 'halt and reverse biodiversity loss' to reiterate the need to reverse the trend of biodiversity loss and not settle for continued losses.
- Amend the theory of change and mission footnote to reflect the need to 'halt and reverse' trends in biodiversity loss.

³ CBD/WG2020/3/3 (2021) First draft of the Post-2020 Global Biodiversity Framework, Footnote 8:

In the 2030 Mission, "to take urgent action" reflects the need for action to be taken this decade to address the biodiversity crisis. "Across society" reflects the need for actions to be taken by all stakeholders, and for mainstreaming across sectors of society and the economy. "To put nature on a path to recovery" implies the need for positive action-oriented approach and the need for concerted and strategic action across a range of issues. It also implies the need for a stabilization in the rate of loss of biodiversity and enhanced protection and restoration. "For the benefit of people and planet" highlights elements of nature's contributions to people, makes a strong link to the delivery of the 2030 Agenda for Sustainable Development and its Sustainable Development Goals while also recognizing the intrinsic and existential importance of biodiversity. The 2030 deadline articulates that this mission is a milestone on the way to the 2050 Vision of "living in harmony with nature" and reinforces the need for urgent action this decade.

⁴ CBD/WG2020/3/3 (2021) First draft of the Post-2020 Global Biodiversity Framework, Paragraph 5.

- Add a reference to 'nature-positive' defined as 'net gain in the status of biodiversity and nature's contributions to people'^[1] to encapsulate the needed level of ambition.
- Amend to put reference to a nature-positive world by 2030 for planet and people as the key outcome of the mission, with urgent action across society the means of achieving this.

Commentary on the 2050 Goals and Milestones

Goal A on conservation of ecosystems, species and genetic diversity

On ecosystems: strong goals and targets on ecosystem retention and restoration are fundamental, including the effective conservation of all Key Biodiversity Areas (KBAs), and connecting and integrating networks of KBAs into wider freshwater, coastal, marine and terrestrial ecosystems. We are therefore pleased to see key elements for a goal on ecosystems including area, connectivity and integrity retained, and the reinsertion of the 'net-gain' qualifier to ensure a nature-positive outcome.

On species: Strong, clearly measurable and quantified goals and targets for species recovery are crucial given that species are the fundamental units of biodiversity, the building blocks of ecosystems, and have substantial public resonance. We are very concerned about the changes to Goal A, as without a SMART target on species abundance and extinction risk the mission to recover nature and bend the curve of biodiversity loss by 2030, with transparency, is undermined. Whilst we welcome the fact that tackling extinctions is now included, a focus on reducing the rate of extinction is both insufficient and more problematic to measure. Furthermore, the elements relating to species abundance have been seriously weakened, while the insertion of additional new elements complicates and weakens the Goal. We propose three main changes to the wording of the species component of Goal A (a detailed rationale for our recommendations below is included in our position paper "BirdLife International advocacy priorities for species elements of the First Draft of the post-2020 Global Biodiversity Framework"⁵):

- Increase ambition in reducing extinction risk: the current wording in the 2050 Goal stating that "the risk of species extinctions across all taxonomic and functional groups is halved" implies that in 2050 there will still be substantial risk of extinctions, for example if the current number of threatened species was halved, 18,700 species would still be threatened, or the current 37,400 threatened species would have only moved halfway towards Least Concern status. Such substantial levels of extinction risk are inconsistent with the 2050 Vision of a world living in harmony with nature. We therefore recommend revising this wording to "the risk of species extinctions across all taxonomic and functional groups is eliminated". Note that this refers to known threatened species, and human-induced extinction risk. With these clarifications, evidence suggests that eliminating such extinction risk (as measured using the IUCN Red List) by 2050 is feasible, with transformative change.
- Halt human-driven extinctions of known threatened species: The current wording in the 2030 Milestone A.2 stating that "the increase in the extinction rate is halted or reversed" is

^[1] Locke et al (2020) <u>A Nature-Positive World: The Global Goal for Nature</u>

⁵ <u>BirdLife International advocacy priorities for species elements of the First Draft of the post2020 Global Biodiversity Framework</u> (August 2021)

insufficiently ambitious given that extinctions are irreversible. Immediate action is therefore required to prevent any further human-induced extinctions of known threatened species. This will be necessary to achieve the 2050 goal of a reducing the rate of all extinctions all species at least tenfold, given that some extinctions may result from natural events (e.g. volcanic eruptions). We therefore recommend revising this wording to "human-driven extinctions of known threatened species are halted".

Simplify and increase ambition to restore the abundance of species: The current wording in the 2030 Milestone A.2 stating that "the abundance and distribution of populations of species is enhanced or at least maintained" is insufficiently ambitious in order to achieve "healthy and resilient populations of all species" by 2050 as called for in the Goal. Instead, average population abundance of species must increase by at least 20% by 2030 in order to restore baseline levels by 2050, as shown in Figure 2 below. "Enhanced" should be removed because it is too vague. "Distribution" should be removed because distributions can increase even if species populations are decreasing. "Populations of" should be removed because it distracts from a focus on the overall abundance of each species, noting that some populations may increase while others decrease- it is the overall trend that is important. We therefore recommend the revised wording "the average population abundance of species is increased by at least 20 per cent".

Current text

Goal A.

The integrity of all ecosystems is enhanced, with an increase of at least 15 per cent in the area, connectivity and integrity of natural ecosystems, supporting healthy and resilient populations of all species, the rate of extinctions has been reduced at least tenfold, and the risk of species extinctions across all taxonomic and functional groups, is halved, and genetic diversity of wild and domesticated species is safeguarded, with at least 90 per cent of genetic diversity within all species maintained.

2030 Milestones

(A.1) Net gain in the area, connectivity and integrity of natural systems of at least 5 per cent.

(A.2) The increase in the extinction rate is halted or reversed, and the extinction risk is reduced by at least 10 per cent, with a decrease in the proportion of species that are threatened, and the abundance and distribution of populations of species is enhanced or at least maintained.

(A.3) Genetic diversity of wild and domesticated species is safeguarded, with an increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.

Recommended text

Goal A.

The integrity of all ecosystems is enhanced, with an increase of at least 15 per cent in the area, connectivity and integrity of natural ecosystems, supporting healthy and resilient populations of all species, **human-driven** extinctions **of known threatened species are halted**, and the risk of species extinctions across all taxonomic and functional groups is **eliminated**, and genetic diversity of wild and domesticated species is safeguarded, with at least 90 per cent of genetic diversity within all species maintained.

2030 Milestones

(A.1) Net gain in the area, connectivity and integrity of natural ecosystems of at least 5 per cent.
(A.2) Human-driven extinctions of known threatened species are halted, extinction risk is reduced by at least 20 per cent, with a decrease in the proportion of species that are threatened, and the average population abundance of species is increased by at least 20 per cent.
(A.3) Genetic diversity of wild and domesticated species is safeguarded, with an increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.

Goal and Milestones text

- Retain references to an increase in all of area, connectivity and integrity of natural ecosystems.
- Add an element on "human-driven extinctions" in both the goal text and the milestone, as a bold commitment to build on that made to halt extinctions under Aichi Target 12.
- Amend the goal text to state that the risk of species extinctions across all taxonomic and functional groups "is eliminated" instead of "is halved" in order to make the goal consistent with the 2050 vision of living in harmony with nature.
- **Retain** the requirement for "net gain", in Milestone A.1, as this must lead to improvement across all three attributes of natural ecosystems stated (area, connectivity, and integrity), and **amend** to say "ecosystem" rather than "system" in line with the goal.
- Amend Milestone A.2 to reduce extinction risk by 20 per cent to place us on the trajectory needed to achieve zero risk of human-driven extinction by 2050.
- Amend Milestone A.2 to state that "human-driven extinctions of known threatened species are halted" to replace the current low ambition for "the increase in the extinction rate" to be halted.
- Amend Milestone A.2 to remove mention of "distribution of populations" and "enhanced or at least maintained" and revise to read "the average population abundance of species is increased by at least 20 per cent", in line with the ambition of restoring a 1970s baseline for average wildlife population abundance by 2050.
- Add a clear baseline for measurement of progress towards this goal, through the goal text or within the monitoring framework, in the form of headline indicators with agreed baselines and reference points (which may or may not be the same: the baseline being the base state and the reference point the time period from which to measure progress against the target).

Components and indicators

• **Retain** Headline Indicator A.0.3. "Red List Index" to recognise its importance as an indicator of both species group health and resilience, and as a proxy for ecosystem integrity and connectivity, and on that basis **retain** the proposed disaggregation such as by species group.

- Add a Headline indicator "Trends in population abundance" in order to measure progress towards Milestone A.2, and as a complement to Headline Indicator A.0.3 "Red List Index."
- **Re-insert** the Living Planet Index, the best-known indicator of population abundance, as a Headline indicator of 'Trends in population abundance' under Milestone A.2.
- Amend Component A.4 to "Average population abundance of species."
- Amend Component A.5 "Species extinction rate" to "Species extinctions" complementing A.6 "Species extinction risk" and A.7 "Proportion of species that are threatened".
- **Replace or complement** the proposed Headline Indicator A.0.4 "The proportion of populations within species with a genetically effective population size > 500" (which will not be available for some years yet) with "Trends in population abundance" (which is available already).
- Amend to move Complementary indicator A.42 "Wild Bird Index" to become a Component indicator, in order to support the proposed addition of "Trends in population abundance" as a Headline indicator
- Amend framework to move Complementary indicator A.39 "Percentage of threatened species that are improving in status according to the Red List", to become a Component indicator and reword as "Percentage of threatened species that have improved in status since 2020".
- Retain Complementary indicator A.54 "Red List Index (wild relatives of domesticated animals)"
- Retain Complementary indicator A.33 "Biodiversity Intactness Index"

Goal B on nature's contributions to people

In order to achieve transformative change, we must recognise that 'our economies are embedded within nature, and not external to it.'⁶ This means we must: 1. communicate the importance and value of nature, 2. practice biodiversity-inclusive cross-sector planning, including planning at an ecologically-relevant scale, 3. improve the targets, but focus on implementation, 4. promote actions to address demand, and to collectively live within our means, 5. shift from 'good practice' to 'required practice', and 6. for actions on the ground take an ecosystem approach. The rationale for these recommendations is included in our position paper 'BirdLife recommendations for mainstreaming in the post-2020 Global Biodiversity Framework'.⁷ Finally, mainstreaming needs to be given greater prominence throughout the framework by adopting references to key sectors¹, sector-specific terminology and indicators. These elements should create the enabling conditions needed to foster co-ownership and co-responsibility across sectors and cultivate co-ordinated biodiversity governance via a multi-actor and distributed responsibility approach.

In is important therefore, that across the framework provisions are made for the retention, restoration, and enhancement of all four ecosystem service types: provisioning, regulating, cultural and supporting services, with natural assets under sustainable management, with the benefits derived from these used sustainably.

The recognition and implementation of the right to a healthy environment has wide support from governments, business and civil society and is likely to be recognised by the UN. It should therefore be incorporated into the framework and is fundamental to its success, as it enshrines the right to live in a healthy environment alongside recognition of humanity's duty to take care of the environment, including through encouraging better legal protections for our planet.

Current text

Goal B.

Nature's contributions to people are valued, maintained or enhanced through conservation and sustainable use supporting the global development agenda for the benefit of all;

2030 Milestones

(B.1) Nature and its contributions to people are fully accounted and inform all relevant public and private decisions.

(B.2) The long-term sustainability of all categories of nature's contributions to people is ensured, with those currently in decline restored, contributing to each of the relevant Sustainable Development Goals.

⁶ Dasgupta, P. (2021), <u>The Economics of Biodiversity: The Dasgupta Review</u>. (London: HM Treasury)

⁷ <u>BirdLife International advocacy priorities for species elements of the First Draft of the post2020 Global Biodiversity Framework</u> (August 2021)

Recommended text

Goal B.

Nature's contributions to people are valued, maintained or enhanced through conservation, **restoration**, and sustainable use supporting the global **sustainable** development agenda for the benefit of all;

2030 Milestones

(B.1) Nature and its contributions to people are fully accounted **and incorporated to ensure** all relevant public and private decisions **fulfil the right to a healthy environment**.

(B.2) The long-term **sustainable management and use** of all categories of nature's **positive** contributions to people is ensured, with **recent** declines restored, contributing to each of the relevant Sustainable Development Goals.

Goal and Milestones text

- **Retain** the references to all categories of nature's contributions to people, which include the four ecosystem service types: provisioning, regulating, cultural and supporting services.
- **Retain** in the goal the reference to require conservation *and* restoration, and sustainable use therein, of nature's contributions.
- Add reference to 'sustainable' in the goal text to ensure that this milestone is associated with wider sustainable development priorities and the 2030 Agenda, and not in lieu of.
- Add under B1 'ensure' as opposed to 'inform' to strengthen the weight given to nature and its contributions in terms of guiding the decision-making process and follow this with 'fulfil 'the right to a healthy environment' to make the delivery of this right as a result of these actions explicit.
- Amend B.2 to clarify the focus as the "sustainable management" and "use" of nature's positive contributions to people, to ensure that natural assets are sustainably managed as well as benefits sustainably used.
- Amend to remove the reference to "those currently in decline" and replace with "recent declines" as under the current text declines in the recent past that have plateaued below delivery capacity are outside the scope for restoration. This must be underpinned by an appropriate baseline.
- **Retain** the direct reference to the Sustainable Development Goals, which highlights the role of biodiversity in contributing to these goals.
- Amend the glossary definition of 'Nature's contribution to people', to include and distinguish those ecosystem services with a detrimental impact; these must be accounted for if we're to fully account for both benefits and risks under associated with nature's contributions under B.1.

- **Retain** the Headline Indicator B.0.1 "National environmental economic accounts of ecosystem services" under the UNSEEA
- **Retain** Complementary indicator b.2 "Red List Index (pollinating species)" and Complementary indicator b.7 "Climatic Impact Index"

Goal D on means of implementation

The plan needs to be actively implemented both at national level and beyond through international cooperation, tracking progress via a core set of indicators, and adequately resourced, including through integrating nature into economic systems. Each target needs a clear, adequately resourced implementation plan, including milestones to 2030. It is imperative that global and national targets are significantly improved so that they are more SMART (Specific, Measurable, Ambitious, Realistic, Time-bound, to which we add Unambiguous and Scalable), ideally including some core, nationally comparable, measures. Currently many of the targets and elements do not meet these criteria. Without this the regular and accurate monitoring and reporting of progress, and therefore accountability and strength of the implementation mechanism, is undermined.

We are pleased to see Goal D now making an explicit reference to closing the biodiversity financing gap, quantifying the amount of financial resources needed. However, 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.

Furthermore, to facilitate implementation of the framework, there must be a time-bound action plan for resource mobilisation, which should include the development and implementation of national biodiversity financing plans. The new GEF 8 replenishment documentation will likely state that the financing will be made available to support the development of these plans – which is welcome support for this vital process.

Current text

Goal D.

The gap between available financial and other means of implementation, and those necessary to achieve the 2050 Vision, is closed.

2030 Milestones

(D.1) Adequate financial resources to implement the framework are available and deployed, progressively closing the financing gap up to at least US \$700 billion per year by 2030.

(D.2) Adequate other means, including capacity-building and development, technical and scientific cooperation and technology transfer to implement the framework to 2030 are available and deployed.(D.3) Adequate financial and other resources for the period 2030 to 2040 are planned or committed by 2030.

Recommended text

Goal D.

The gap between available financial and other means of implementation, and those necessary to achieve the 2050 Vision, is closed, and all public and private financial flows are aligned to a nature-positive world.

2030 Milestones

(D.1) Adequate financial resources to implement the framework are available and deployed, progressively closing the financing gap up to at least US \$700 billion per year by 2030,
(D.2) Adequate other means, including capacity-building and development, technical and scientific cooperation and technology transfer to implement the framework to 2030 are available and deployed.

(D.3) Adequate financial and other resources for the period 2030 to 2040 are planned or committed by 2030.

Goal and Milestones text

- Retain the reference to closing the biodiversity financing gap (and the gap in other means of implementation) in the Goal language, including the figure of 'at least US \$700 billion per year', and ensure the definition of the measures to reduce the financing gap includes the reduction or redirection of incentives and expenditures harmful to biodiversity alongside the significant increase of finances from all sources. Accordingly, a definition of the biodiversity financing gap should be added to the glossary.
- **Retain** the focus on Milestone D.1. on closing the biodiversity financing gap, and the reference to a clearer, more specific, and measurable global commitment on financial means of implementation.
- **Retain** the focus of Milestone D.2 on ensuring that other means of implementation, such as capacity building, technology transfer and scientific cooperation are available and deployed.
- **Amend** to include an estimate of the resource mobilisation commensurate with full implementation of the global biodiversity framework.

- **Retain** indicator D.0.1 "Funding for implementation of the global biodiversity framework" but clarify this to include an assessment of progress towards closing the biodiversity financing gap
- Amend to clarify Headline Indicator D.0.2 "Indicator on national biodiversity planning processes and means of implementation" to be measured through national biodiversity finance plans assessing the extent to which they have been developed and implemented.

Commentary on the Targets

Reducing Threats

Target 1 on ecosystems and spatial planning and land/sea use change

While we are pleased to see an improvement of this target, with *all* land and sea areas to be under *biodiversity-inclusive* spatial planning, there should be a focus on key areas for biodiversity alongside intact areas. This target should also clearly be part of a package with Targets 2 and 3, with spatial planning fully taking into account and guiding conservation of areas as well as restoration.

Current text

Target 1. Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.

Recommended text

Target 1. Ensure that all land and sea areas globally are under integrated biodiversity-inclusive, **multi-sectoral** spatial planning **at an ecologically-relevant scale**, addressing land- and sea-use change, **and** retaining existing intact and wilderness areas and **key areas for biodiversity**.

Target text

- **Retain** the inclusion of "all" land and sea areas to require biodiversity-inclusive spatial planning, which means that the target is fully comprehensive in terms of coverage.
- **Retain** the inclusion of "biodiversity-inclusive" spatial planning to ensure that all development plans (e.g. land use, urban, infrastructure) have biodiversity at their core.
- Add reference to the need for spatial planning to be "multi-sectoral" to ensure spatial planning is fully mainstreamed and to make clear that all sectors need to be considered and engaged within the planning process.
- Add that such spatial plans be prepared at an "ecologically-relevant scale" to ensure planning is at the scale at which ecological processes operate (i.e. at the flyway scale for species migration). This should be part of appropriately developed and fully implemented Strategic Environmental Assessment.
- Add reference to also retain all key areas for biodiversity given that there are many areas of high conservation importance that should be retained in addition to intact or wilderness areas.
- Add to guidance on this target a specific mention that comprehensive KBA identification and mapping should be a key component of spatial planning.

- **Retain** Headline indicator 1.0.1. "Percentage of land and seas covered by spatial plans that integrate biodiversity" guidance on this indicator should indicate identification and comprehensive mapping of Key Biodiversity Areas as a core component of biodiversity-inclusive spatial plans.
- **Amend** framework to up-list Complementary indicator T1.1. "Number of countries using natural capital accounts in planning processes" to a Component indicator.

Target 2 on restoration

We welcome the inclusion of a new, standalone target on restoration, rather than bundling it in with the target on spatial planning as before. This sets a commitment of restoring 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', instead this commitment should be based on a proportion of the overall global land and sea area and implemented with a view to restoring natural (rather than productive/converted) ecosystems and connectivity in conjunction with Targets 1 and 3. Once restored these ecosystems should be actively conserved to maintain the ecological benefits achieved through restoration.

Current text

Target 2. Ensure that at least 20 per cent of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems

Recommended text

Target 2. Ensure that at least 20 per cent of freshwater, **coastal**, marine and terrestrial ecosystems are under **high quality** restoration, ensuring connectivity among them and focusing on priority **degraded** ecosystems.

Target text

- Amend to move the reference to "degraded" to be the focus of priority ecosystems rather than limit restoration to only 20% of degraded areas, thus raising the global restoration ambition to 20% of ecosystems globally, helping put us on the path to being nature-positive by 2030, and avoiding issues with potentially varying assessments of globally degraded areas.
- Add "coastal" in the list of ecosystem types, and ensure that the glossary definition includes this as follows: "land and sea areas include all terrestrial and aquatic ecosystems, including freshwater and coastal biomes".
- Add a reference to the need for 'high quality' restoration, which should be defined as adhering to international principles and standards for restoration. We have produced a set of principles for nature restoration based on the experience of the BirdLife Partnership around the world, which cover best practice in terms of both process and outcomes.⁸
- **Retain** focus on priority ecosystems, clarifying that priority should be given to "degraded" ecosystems and provide further clarity on how these are classified in the guidance.

- Amend the Headline indicator 2.0.1 "Percentage of degraded or converted ecosystems that are under restoration" to be more results oriented and include a measure of impact, not just process

 using international standards for high quality restoration as a measure.
- **Retain** the Complementary Indicator t1.17 "Percentage of cropped landscapes with at least 10% natural land".

⁸ BirdLife International (2021) Nature restoration for green recovery and beyond: principles and best practice from BirdLife's experience.

Target 3 on area-based conservation measures

We are pleased to see "areas of particular importance for biodiversity" more upfront in the target, and though KBAs are included within the explanatory one-pager on this target (CBD/WG2020/3/INF/3) we would like to see them explicitly referenced in the target text. The addition of "equitable" management is welcome as fundamental to the inclusion of key stakeholders, including IPLCs and other constituencies. However, whilst the individual elements included in the current formulation are important, this target requires significant streamlining to ensure its ambition is clear and communicable.

To move beyond the Aichi target, to a focus on outcomes rather than just process, requires real weight being given to the "effectiveness" component, and the quality of the method, transparency, and robustness of how this is measured. Management effectiveness should be measured on whether conserved areas (protected areas and OECMs) are achieving favourable conditions or showing demonstrable signs of ecological recovery for their target species, ecosystem, and/ or contribution to people. Effectiveness should be independently assessed, with only those adhering to this measure of 'effectiveness' qualifying to count towards the 30% target.

Current text

Target 3. Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective areabased conservation measures and integrated into the wider landscapes and seascapes.

Recommended text

Target 3. Ensure that at least 30 per cent globally of land and sea areas, especially **Key Biodiversity Areas and other** areas of particular importance for biodiversity, are conserved through ecologically representative and well-connected systems of **effectively and equitably managed** protected areas and other effective area-based conservation measures.

- **Retain** the focus on "areas of particular importance for biodiversity" upfront in the target.
- Add to specify 'Key Biodiversity Areas' because they provide Parties with an existing set of important sites for the broad range of biodiversity values identified using an internationally agreed common standard.
- **Retain** the addition of "equitable" management and ensure appropriate reference to ensuring such area-based measures recognise and support the rights and contributions of IPLCs, and the inclusion of other important constituencies, is included in the target guidance.
- **Retain** the word "conserved" rather than "protected" to make it clearer that this is not restricted to areas with formal protection, to allow consistency with the reference to OECMs.
- Retain the reference to areas being well-connected.
- **Retain** the reference to "30% globally of land areas and of sea areas" to be clear that it applies in each of the major ecosystem types (terrestrial, marine, freshwater and coastal), so that none are neglected.
- Amend to streamline the target, the reference '*nature's contributions to people*' and ensure its inclusion in the explanatory guidance on areas particularly important for biodiversity as an important component for delivery of this target.

- Amend Headline Indicator 3.0.1 "Coverage of Protected Areas and OECMs (by effectiveness)" to "Coverage of Protected Areas and OECMs (by Key Biodiversity Areas, and effectiveness)", to recognise both these relevant cuts of the indicator, as PA/OECM coverage of KBAs should be highlighted as an important indicator relating to biodiversity outcome which is already used to report as such against the SDGs and other global processes. The effectiveness cut should refer to the IUCN Standards for management effectiveness (the IUCN Green List of Protected and Conserved Areas) - to which areas must adhere to count towards the 30% target.
- Amend the Component 3.2 'Areas of particular importance for biodiversity are protected and conserved' to 'Trends in coverage of Key Biodiversity Areas and other areas sites of particular importance for biodiversity' to recognise the important contribution of KBAs in landscape-scale conservation.
- Add a Complementary indicator: "Number of countries in which KBA inventories have been updated nationally using the Global KBA Standard".⁹

⁹ IUCN (2016) <u>A Global Standard for the Identification of Key Biodiversity Areas Version 1.0</u> IUCN, Gland, Switzerland

Target 4 on species conservation actions

We are pleased to see the inclusion of a species action target retained. It will be critical to implement targeted intensive recovery actions, both in situ and ex situ, where required, for species whose survival depends on it or whose recovery cannot otherwise be enabled or sustained. However, this target is very vague and lacks SMART elements; we are concerned that none of the Headline indicators relate to the primary focus of this target (active management actions to ensure the recovery of species). Furthermore, the additional clauses on genetic diversity of domestic species and human-wildlife conflict are unrelated to promoting recovery actions and would be better removed from this target. Hence, we have three key recommendations:

- 1. **Focus on wild species:** The addition of domesticated species to this target is a worrying distraction from the urgent actions needed to conserve wild species. We recommend that conserving the genetic diversity of domesticated species is covered under Target 10 on sustainable agriculture, and hence that the words "and domesticated" are deleted here.
- 2. Focus on threatened species: The purpose of this target is to promote the species-specific recovery actions needed to prevent extinctions, improve the conservation status and recover the abundance of threatened species for which mitigating threats (the focus of other targets) will be insufficient to achieve this. Recovery and conservation of *non-threatened* species will typically be achieved not through "active management actions" but through reducing threats (targets 5-8), transitioning to more sustainable production systems (target 10), and conserving and restoring natural habitats (targets 1-2) and important sites for biodiversity (target 3). We therefore propose the insertion of the word "threatened".
- 3. **Focus on species conservation:** The issue of human-wildlife conflict is best dealt with elsewhere, such as under Target 9 (which is about the benefits to people from wild species). It is unrelated to species conservation, which is the focus of Target 4.

Current text

Target 4. Ensure active management actions to enable the recovery and conservation of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict

Recommended text

Target 4. Ensure active management actions to enable the recovery and conservation of **threatened wild** species **and their** genetic diversity, including through ex situ conservation.

- **Retain** the text on 'active management actions' focusing this target on conservation action rather than sustainable use.
- Add "threatened" to focus action on threatened species whose survival depends on speciesspecific recovery actions and for whom mitigating threats will be insufficient (as guided, where applicable, by the Red List).
- **Remove** the reference to human-wildlife conflict in this target, as this is unrelated to species conservation (which is the focus of this target) and move it to a more suitable target related to sustainable use/management, such as Target 9.

• **Remove** the reference to domesticated species as it is a worrying distraction from the urgent actions needed to conserve wild species. It would be better moved to Target 10.

- Add a Headline Indicator to address the primary focus of the target (active management actions to ensure the recovery of species): "Proportion of species requiring intensive recovery actions to avoid extinction that are under active recovery management"
- Add a Component indicator "Proportion of species requiring intensive recovery actions to avoid extinction that are under active recovery management" under Component 4.1 'Conservation and recovery actions.'
- Add Component indicator "Percentage of threatened species that have improved in status since 2020".

Target 5 on sustainable harvesting, trade and use of wild species

This target has a broad approach, covering both subsistence use and industrial-scale species exploitation, which risks its ambiguous interpretation and consequently the wrong application of the target and therefore requires clarification. In its current form, the language refers to harvest/use/trade being at a sustainable level. However, by solely addressing target species, and not the associated impacts of such activities on non-target species – through bycatch for instance – the desired sustainability cannot be achieved. Such activities should be conducted within safe biological limits of target species. There needs to be a clear distinction between legal and illegal activities (including harvest, trade, and use) to avoid a perverse outcome whereby implementation of this target results in higher levels of exploitation, as the process to legalise, regulate and effectively manage these activities requires more effort than allowing them to continue illegally and or unsustainably. Regulation must include the identification and application of sustainable harvesting methods and setting of quotas based on ecological limits. Recognition of the trade, harvesting and use types including key sectors (in particular fisheries) responsible for wild species exploitation through the target elements and headline and component indicators is fundamental to the effective tracking of this target.

Current text

Target 5. Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.

Recommended text

Target 5. Ensure **legal** harvest, trade and use of wild species is sustainable, **effectively regulated** and safe for human **and animal** health, **and has no detrimental impacts on nontarget species, with illegal activities eliminated.**

Target text

- **Retain** the addition of "safe for human health" which clarifies the definition of 'safe' in a post-Covid 19 world and **add** 'and animal' health to fully align with the adoption of the One Health approach as endorsed by the CBD.
- **Amend** to clarify that harvest/trade/use of wild species should be regulated and related wildlife policies effectively enforced through adding "effectively regulated".
- Add a reference to "legal" at the start to ensure that there is a clear distinction between expectations associated with legal and illegal activities (including harvest, trade, and use).
- Add "with illegal activities eliminated", as the focus should be on eliminating illegal harvesting, trade and use.
- Add the text "and has no detrimental impacts on non-target species" to address the issue of bycatch of non-target species.

- Amend Headline indicator 5.0.2 "Proportion of fish stocks within biologically sustainable levels" to "Red List Index (Impact of fisheries)" given that a focus on fish stocks is too narrow an indicator.
- Amend the components under this target (which can be misinterpreted as a call for the legalisation of harvest, use and trade) to "Elimination of illegal harvest and trade", and "Legal

harvest and trade is sustainable, effectively regulated and safe for biodiversity and human health"

- Add a Complementary indicator: Living Planet Index (trends in target and bycatch species)
- Add a Complementary indicator: "Red List Index (Impacts of utilisation)" to facilitate better monitoring of the impacts of use.

To note: For effective implementation and successful achievement of **Target 7** on pollution and **Target 9** on ensuring benefits to people through sustainable management of biodiversity, both rely on the integration of biodiversity conservation within sectoral policies and practices.

Target 6 on invasive alien species

The target on invasive alien species (IAS) has many elements, and the level of complexity makes its interpretation and implementation difficult. The lack of clear definitions for 'priority sites and priority species' further complicates the targets implementation. We suggest that the definition of priority sites includes all key areas for biodiversity impacted by invasive alien species, alongside those identified as global island priorities for eradication. Invasive alien species have had particularly devastating impacts on oceanic islands but are also often feasible to eradicate or control. We are pleased to see a quantified rate of reduction associated with introduction and establishment though we would like to see this paralleled with a quantified target around reducing impacts of IAS. Finally, a component and associated indicator should be included both on legislation and enforcement.

Current text

Target 6. Manage pathways for the introduction of invasive alien species, preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate invasive alien species to eliminate or reduce their impacts, focusing on priority species and priority sites.

Recommended text

Target 6. Manage pathways for the introduction of invasive alien species, preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate invasive alien species to eliminate or reduce their impacts, focusing on priority species and priority sites.

Target text

- **Retain** the reference to managing the 'pathways for introduction' and 'establishment,' and the need to 'control' or 'eradicate' as key elements of the strategic management of invasive alien species.
- Add a quantification associated with the elimination and reduction of IAS impacts to provide balance across the target.
- Add within the guidance clarity should be provided on the definition of priority species and sites, and note the lists already available to guide the implementation of this target, including In the Global Island priorities for eradication¹⁰.

- **Reinstate** component indicator 'Red List Index (impacts of IAS)' to track to track progress against component 6.3 Reducing the impact on [...] priority species
- **Reinstate** component indicator 'Proportion of key biodiversity areas threated by invasive alien species' to track progress against component 6.3 Reducing the impact on [...] priority sites.
- Add a component and associated indicator to cover legislation and enforcement.

¹⁰ Holmes *et al.* (2019) <u>Globally important islands where eradicating invasive mammals will benefit highly threatened vertebrates.</u> PLoS ONE 14 (3)

Target 7 on pollution

We are pleased that Target 7 on pollution has been strengthened and made SMARTer, with an ambitious target of reducing pesticides by at least two thirds. However, a reduction in pesticide use, as the current target implies, is not a sufficient proxy for pollution by pesticides caused through leaching and loss to the environment. Not all pesticides will leach/pollute equally and "pesticide use per areas of cropland" (as is the current Headline Indicator) is a poor measure of pollution reduction as it doesn't safeguard against increasing toxicity, total land area, the number of applications or an increasing cocktail affect. To effectively monitor pollution by pesticides trends across multiple categories should be monitored simultaneously using multiple metrics, including assessments of toxicity, and results assessed together. Levels of plastic pollution already in the environment must be addressed as a significant threat to biodiversity.

Current text

Target 7. Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.

Recommended text

Target 7. Reduce pollution from all sources, including by reducing **excess** nutrients by at least half, and pesticides by at least two thirds, and eliminating plastic waste **in the environment**, to levels that are not harmful to biodiversity and ecosystem functions and human health.

Target text

- **Amend** 'reducing nutrients lost to the environment' to 'reducing excess nutrients' which has a clearer focus on the need to reduce the application of nutrients outright.
- **Amend** to phrase 'eliminating plastic waste in the environment' to raise the ambition and highlight the need to remove plastics polluting the environment as well as preventing their discharge.

Components and indicators

• Amend Headline Indicator 7.0.3 "Pesticide use per area of cropland" to not solely use weight per area as the measure, but also area treated with pesticides and treatment frequency. Crucially this should include a metric of toxicity (including pesticides with high toxicity for birds, fish, amphibians, and mammals; pesticides with high aquatic toxicity; and those with high toxicity for beneficial organisms including bees).

Target 8 on climate change mitigation and adaptation

We welcome the inclusion of a stronger climate-related target that more clearly quantifies the contribution of ecosystem-based approaches to mitigation efforts¹¹ whilst also acknowledging that mitigation and adaptation must not be at the expense of biodiversity. However, there remain several areas of concern, including the failure to quantify nature's potential contribution to climate adaptation. There is also no reference to biodiversity conservation in the context of climate change, with reference to enhancing the resilience of biodiversity and vulnerable ecosystems to climate change¹². The removal of references to nature-based solutions, with sole emphasis on ecosystem-based approaches (EBAs) are a form of nature-based solution (NbS), with NbS being the umbrella term to recognise all forms of solutions based in nature. Crucially, NbS, in all forms, must be biodiversity-inclusive and sustain, enhance, or support biodiversity by adhering to widely supported principles¹³.

Current text

Target 8. Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO2e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.

Recommended text

Target 8. Minimize the impact of climate change on biodiversity **through enhanced resilience**, contribute to mitigation and adaptation through **biodiversity-inclusive nature-based solutions**, contributing at least 10 GtCO2e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity and **marginalised peoples**.

- **Retain** the quantitative target of 10 GtCO2e per year, which is SMART and integrates mitigation contribution of nature-based solutions, recognising the potential of nature to combat climate change.
- Add text to require Parties to plan biodiversity conservation in the context of climate change by enhancing/ maximising the resilience of biodiversity, given that we are on a trajectory of a warming world, and conservation approaches must account for this.
- Amend "ecosystem-based approaches" to "biodiversity-inclusive nature-based solutions" given that nature-based solutions are the umbrella term and provide an essential opportunity to bring convergence with the UNFCCC process and bring co-benefits.
- Add "biodiversity-inclusive" as an important addition to ensure that any actions benefit biodiversity as well as climate.
- Add reference to 'marginalised peoples', to recognise the differentiated impacts of climate change and the need to safeguard these groups according to clearly established principles.

¹¹ Girardin *et al* (2021) <u>Nature-based solutions can help cool the planet — if we act now.</u> Nature

¹² As in recommendation No. 205 (2019) of the Bern convention

¹³ Nature-based Solutions to Climate Change Key Messages for decision makers in 2021 and beyond

- **Retain** the Headline Indicator 8.0.1 "National greenhouse gas inventories from land use and land use change".
- Retain Component indicator 8.1.1 "Number of countries with nationally determined contributions, long-term strategies, national adaptation plans and adaptation communications that reflect biodiversity (based on information from UNFCCC and SDG 13.2.1)" and ensure in the guidance that this includes the requirement for Parties to include plans for biodiversity conservation under a two-degree Celsius world.
- Add a Complementary indicator: "Climatic Impact Index."

Meeting People's Needs

Target 9 on sustainable management of wild species of fauna and flora

We welcome the addition of a reference to the protection of the customary rights of IPLCs in this target, which complements our call for the wider recognition of IPLCs and their rights across the framework. However, there remains a need to better stress the need for positive biodiversity outcomes and sustainability under this target. We are therefore calling for this target to include a focus on achieving enhanced resilience of biodiversity to ensure sustained delivery of the benefits outlined (including nutrition, food security, medicines and for livelihoods) through sustainable use of wild species. As previously stated, this target should not promote scaled up use of wild species. Of fundamental importance is the effective tracking of the sustainability of wild species as a resource through the monitoring framework.

Current text

Target 9. Ensure benefits, including nutrition, food security, medicines, and livelihoods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities.

Recommended text

Target 9. Ensure benefits, including nutrition, food security, medicines, and livelihoods, for people especially for the most vulnerable [through **enhanced resilience and** sustainable **use** of wild terrestrial, freshwater and marine species]* and protecting customary sustainable use by indigenous peoples and local communities.

Target text

- Add a requirement to 'enhance' the resilience of biodiversity, to strengthen the biodiversitypositive elements of this target.
- ***To note,** to align and streamline the cluster of targets on sustainable use, the bracketed text could be removed, with these elements picked up under Target 5 and 10.
- **Amend "**sustainable management" to "sustainable use" to parallel Target 5, which addresses the threats posed by use, and avoid confusion with management under Target 10.
- **Retain** the addition of text on the protection of IPLCs' customary sustainable use to safeguard the continued access to and use of wild species by IPLCs.
- **Retain** reference to groups of species targeted for inclusion to align with language used across the framework.

- Add a Headline indicator on sustainability of the resource to ensure that levels of use are consistent with species stocks.
- Retain the Complementary indicator t8.5 "Red List Index (species used for food and medicine)"
- Add a Complementary indicator: "Red List Index (impact of utilisation)" to facilitate better monitoring of the impacts of use.
- Add a Complementary indicator: "Red List Index (impact of fisheries)" to facilitate better monitoring of fisheries related impacts.

Target 10 on productive ecosystems managed for sustainable use

We understand that the purpose of this target is to reflect the important contribution biodiversity and associated ecosystem services provides to productivity and associated benefits for people, crucially the target must ensure that development is sustainable and does not allow for or drive perverse outcomes. Therefore, we are suggesting the target is framed to prioritise ensuring the enhancement of such benefits derived from biodiversity are managed 'sustainably for biodiversity'. The revised language now places the responsibility for maintaining the resilience of biodiversity with the key productive sectors, however, narrowing the focus from managed ecosystems and other responsible productive sectors means that other important sectors responsible for driving biodiversity loss could be overlooked. This target remains lacking in 'SMART' elements through which to track progress towards its implementation and must be underpinned by robust indicators.

Current text

Target 10. Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.

Recommended text

Target 10. Ensure all areas under agriculture, aquaculture and forestry are managed sustainably **for biodiversity** [through conservation and sustainable use], increasing **resilience and securing the productivity** of these production systems.

Target text

- **Retain** reference to aquaculture to ensure marine-based activities are represented, and the focus of this targets is across productive sectors in each of the major ecosystem types. This is on the basis that fisheries are explicitly covered under Target 5.
- Add a reference to 'for biodiversity' after the word 'sustainably' to ensure sustainable management approaches are biodiversity-inclusive, do no harm and result in biodiversity-positive outcomes.
- **Remove** 'in particular' and revise the target to place biodiversity at the centre of these sector's area management practices and bring into line with a nature positive vision.
- **Amend** the order to place resilience ahead of productivity and **add** 'securing the' to recognise that only with enhanced resilience will we secure the long-term productivity of these systems.
- Add within the guidance on sustainable management that this must include the conservation of the genetic diversity of domesticated species and reflect this in the monitoring framework.

- **Amend** both selected headline indicators to include a qualifier that sustainable management must be biodiversity-inclusive to avoid perverse outcomes (e.g. logging of primary forest).
- Add a headline indicator on sustainable aquaculture to rebalance focus of indicators across marine and terrestrial systems.
- **Amend** Headline Indicators 10.0.1 on agriculture and 10.0.2 on sustainable forest management to include a requirement to include biodiversity-inclusive elements and to ensure these indicators do not promote perverse outcomes (i.e. clear felling of primary forest).
- **Retain** Complementary indicator t9.2 "Red List Index (wild relatives of domesticated animals)" and Complementary indicator t9.3 "Red List Index (pollinating species)"

Target 11 on maintaining and enhancing nature's contributions to people

This target has taken a backward step, as it was previously phrased it was solution-oriented through the inclusion of nature-based solutions, recognising their contribution to the regulation of air quality, hazards and extreme events and water provision. It must be made clear a fundamental component in securing these benefits is the retention, conservation, and restoration of ecosystems, as recognised under Targets 1-3.

Current text

Target 11. Maintain and enhance nature's contributions to regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people.

Recommended text

Target 11. Maintain and enhance nature's contributions to regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people **through biodiversity-inclusive nature-based solutions**.

Target text

- Retain reference to the multiple benefits of regulating ecosystem services.
- **Reinstate** 'nature-based solutions', to ensure (as advocated for under Target 8) that naturebased solutions (NbS) are recognised as key tools in maintaining and enhancing ecosystem service delivery. NbS is an umbrella term inclusive of 'ecosystem approaches' and 'ecosystembased approaches' with a wider scope than both of these concepts, as it includes activities for the retention, restoration and/or amplification of all ecosystem service (climate mitigation, adaptation and disaster risk reduction as well as other ecosystem services).
- Add 'biodiversity-inclusive' alongside 'nature-based solutions' to ensure the critical role of biodiversity in these NbS is explicit.

Components and indicators

• **Retain** the Headline indicator 11.0.1. "National environmental-economic accounts of regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people, from ecosystems". The recently adopted SEEA (System of Environmental Economic Accounting) framework will provide countries with the statistical tools to measure their natural assets and associated benefits.

Target 12 on cultural ecosystem services and benefits to health and wellbeing

Whilst this target has a focus on health and wellbeing, it is important to focus on biodiversity here, and recognise that blue/green spaces planned and managed effectively for biodiversity also secure benefits including local climate adaptation and mitigation, clean air and water, and improved food security, which should be made more explicit in the target language. Although an increase in area, access and benefits from green/blue spaces is creditable, as currently formulated the target is not SMART.

Current text

Target 12. Increase the area of, access to, and benefits from green and blue spaces, for human health and well-being in urban areas and other densely populated areas.

Recommended text

Target 12. Increase the area of, access to, and benefits from **biodiverse** green and blue spaces, for human health and well-being in urban areas and other densely populated areas.

Target text

- Amend to read 'biodiverse' green and blue spaces, to recognise that such spaces must be planned and managed effectively to be 'biodiversity-inclusive.'
- Add qualifier for increase in area, access and benefits to make the target ambitious, SMART and allow effective tracking of progress towards the achievement of this target.

Indicators

 Add an indicator within the monitoring framework to track access, based on distance and/or cost of entry.

Tools and Solutions

Target 14 on mainstreaming and economic reform

Target 14 on mainstreaming must embody the aspiration of a holistic, biodiversity-inclusive approach across all sectors, by placing biodiversity values and safeguards at the heart of decision-making. It is crucially important that the financial sector recognises its role in delivering on this ambition as instrumental in underpinning and driving global economies, and this element should be strengthened in the target. The references through the headline indicator to the System of Environmental Economic Accounting (SEEAs) is important, as it provides a comprehensive and multipurpose approach to assessing the interrelationships between the economy and the environment.

Current text

Target 14. Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.

Recommended text

Target 14. Fully integrate biodiversity values **and safeguards** into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.

Target text

- Add text to ensure mainstreaming is 'biodiversity-inclusive' not just in terms of values but also 'safeguards' to avoid unintended or perverse outcomes for biodiversity.
- Retain specific reference for the need for policy (legal, regulatory) approaches that support
 mainstreaming of biodiversity across all sectors of the economy, both public and private
 sectors.
- Add in the guidance for this target a reference to comprehensively applied, spatially-explicit Strategic Environmental Assessments (SEAs) and the need to ensure that these are applied at ecologically-relevant scale.
- To strengthen the implementation of this target and that of Target 1, we propose that the rationale guidance language for this target makes specific links to the spatial plans developed under Target 1. This provides one such tool that can be used to mainstream biodiversity conservation across sectors.

Components and indicators

• Amend both headline indicators 14.0.1 and 14.0.2 to require that integration of biodiversity includes spatial elements, including through the tracking of integration of Strategic Environmental Assessments.

Target 15 on supply chains

On supply chains, we are pleased to see an improvement to this target, and an explicit reference to action required by all businesses. However, this is at the expense of any mention of other actors (including governments, economic sectors, financial institutions, cities and local governments) whose actions will also be vital for the achievement of sustainable production practices. Governments, for example, must play a key role in setting policies and regulatory measures to encourage and require sustainable practices (e.g. through setting mandatory due diligence obligations in law). The reference to "local to global" importantly wraps in the need to consider impacts beyond national borders. This target needs to be made SMARTer around what "progressively reducing negative impacts" and "increasing positive impacts" means. The aim of this target should be to achieve fully sustainable practices, not just "move towards" this. To guide progress, quantitative targets, or a roadmap of staged actions is needed.

Current text

Target 15. All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal.

Recommended text

Target 15. Ensure that all financial institutions and businesses (public and private, large, medium and small) regularly assess and publicly report on their dependencies and impacts on biodiversity along their full supply chains and practices from local to global, and accordingly avoid negative impacts and reduce biodiversity-related risks, and align all activities to a nature-positive economy.

- Add a reference to the need for governments to "ensure that" business action is taken to make clearer that governments have a key role to play in making sure this action is taken, such as by setting regulatory measures like mandatory due diligence regulations.
- Add text to include "financial institutions" to ensure that their activities are also targeted here.
- **Retain** reference to the requirement for businesses to assess and report on their dependencies and impact on biodiversity.
- Add the need for this assessment and reporting to happen "regularly" and "publicly" to ensure this is both regular and public to ensure effective tracking and enhance transparency.
- **Retain** reference to "local to global", to impacts beyond national borders are accounted for. **Add** text to clarify this must be "along their full supply chains and practices". Further, in the guidance ensure that this is understood to include direct and indirect suppliers and investments.
- Add "ensuring the full sustainability of" the listed practices to raise the ambition of the target and to replace the weak language of "moving towards" sustainability.
- **Remove** "moving towards the full sustainability of..." as this is weak and not SMART language.
- Amend to 'and accordingly avoid [as more ambition is needed than simply to reduce] negative impacts and reduce biodiversity-related risks [without specifying to businesses as this is unnecessary and the risk can apply beyond business], and align all activities to a nature-positive economy' to signify the need to turn assessment into action and to make the language on

"progressively reducing negative impacts" and "increasing positive impacts" SMARTer and more ambitious.

- Add another component to clearly raise the important role of governments in setting policies to drive the achievement of this target with an indicator measuring government policy, such as regulation, that require financial and business sector action. e.g. "the existence and enforcement of sectoral policies mandating business and the financial sector to achieve sustainable practices" (e.g. due diligence obligations to drive the halting of deforestation, degradation and conversion of natural ecosystems).
- **Further develop** Headline Indicator 15.0.1 "Dependencies and impacts of businesses on biodiversity" to clarify what is being measured.
 - This should include an assessment of corporate sustainability reporting which explicitly incorporates biodiversity, based on but extending the existing SDG indicator 12.6.1:
 'Number of companies publishing sustainability reports' (this could be a Component indicator)
 - This should also take into account the work of the Task Force for Nature-related Financial Disclosures and include the number of companies that have set and implemented targets for achieving no net loss or net gain of biodiversity, taking into consideration biodiversity impacts across their value chains.
 - This should also cover financial institutions, so that they are also required to measure, monitor and publicly report all their direct and indirect impacts on nature. For example: "Number of financial institutions using biodiversity metrics to guide investment and risk management around a goal of no net loss or net gain of biodiversity"

Target 16 on sustainable consumption

We are concerned that simply encouraging "people everywhere to make responsible choices taking into account cultural preferences" could be interpreted as a way to continue justifying overconsumption as integral to culture. The focus of this target should be to address unsustainable consumption by reducing overall consumption in line with sustainable levels, and we are pleased to see that the second part of this target is an improvement in this respect. Unsustainable consumption patterns are a key driver of ecological damage –with explicit mention to the key aspects of consumption responsible. It should also be explicitly linked and aligned to SDG Goal 12 and indicators associated with it. This has the potential to be wrapped into an ecological footprint and supply/value chain target.

Current text

Target 16. Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, where relevant the overconsumption, of food and other materials.

Recommended text

Target 16. Ensure that people are **informed**, encouraged and enabled to make responsible choices and have access to **sustainable** alternatives, to reduce by at least half the waste **of** food and other materials, **and eliminate unsustainable consumption**.

- **Remove** reference to "taking into account cultural preferences" given that this provides a getout-clause for continued consumption of unsustainable products, and unsustainable practices to be justified.
- **Amend** to include 'are informed' to make responsible choices, with access to 'sustainable' alternatives to engender a cultural shift towards sustainable lifestyles.
- **Remove** the language on "where relevant" given that if overconsumption is taking place, then it should be addressed through this target
- **Amend** the sentence structure to make clear that it is the waste of food and other materials that is being halved.
- **Amend** the language on overconsumption to the need to "eliminate unsustainable consumption" so that this covers not only overconsumption, but also unsustainable consumption patterns, such as unsustainable meat consumption.

Target 18 on economic incentives and subsidies

Critical to the framework's success is ensuring that it effectively tackles perverse incentives and subsidies which have detrimental impacts for biodiversity. While we welcome this SMARTer revised target, it should be made clearer that *all* subsidies harmful to biodiversity should be eliminated. The US\$ 500 billion per year target is also conservative estimate of what is needed. Furthermore, it is important to monitor *all* subsidies and incentives not just the direct ones. Indirect subsidies and those which encourage consumption or influence supply chains also have impacts on biodiversity directly and indirectly through pollution/waste or increased consumption.

Current text

Target 18. Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.

Recommended text

Target 18. Redirect, repurpose, reform or eliminate **all** incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.

- Add the word "all" to make clear that all harmful incentives (to be interpreted as including subsidies) should be eliminated or redirected/re-purposed to be positive for biodiversity, by 2030.
- **Remove** the language around "including all of the most harmful subsidies" as this is a given if all harmful subsidies are addressed.

Target 19 on resource mobilisation

Ensuring sufficient financial resources are mobilised to support efficient and effective implementation of all targets is critical to close the biodiversity financing gap. We need to maintain the explicit reference to resource mobilisation targets for international flows, domestic financing, and private sector contribution, introduced through this target although more clarity is needed. Crucially this target must be clear that the US\$200 billion per year should be *new* financial resources, in addition to the current levels of biodiversity financing. This number is a conservative estimate current funding flows sit at c. \$124-143Bn/yr¹⁴, with estimates this needs to be multiplied by at least 5 times to be sufficient to support reversing existing trends of loss of ecosystem services. We welcome the inclusion of a quantified target related to increased international financial flows to developing countries, but again see this as a conservative estimate. Finally, it is crucial that these resource flows and expenditures are effective in implementing the framework.

Current text

Target 19. Increase financial resources from all sources to at least US\$ 200 billion per year, including new, additional and effective financial resources, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.

Recommended text

Target 19. Contribute to closing the biodiversity financing gap by increasing new, additional and effective financial resources **for biodiversity** from all sources **by** at least US\$ 200 billion per year, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.

- **Retain** the references to increases in domestic and international financial resources through new, additional and effective resources 'for biodiversity', as well as via the redirection of perverse incentives and subsidies. In combination these must be commensurate with the ambition of the goals and targets and closing the biodiversity finance gap.
- Add a clear reference to "contributing to closing the biodiversity financing gap" to clarify the level of ambition needed with respect to resource mobilisation.
- Amend to clarify that the US\$ 200 billion per year figure is *new* finance, hence change to "by at least"
- Add text to clarify that this new money is focused in delivering "for biodiversity".
- Amend to increase the value of the US\$200 billion figure and US\$10 billion figures, in line with the transformation needed to close the biodiversity finance gap¹⁵.

¹⁴ Deutz et al (2020) <u>Financing Nature: Closing the Global Biodiversity Financing Gap</u> Paulson Institute

¹⁵ Deutz et al (2020) Financing Nature: Closing the Global Biodiversity Financing Gap Paulson Institute

• **Retain** the reference to national biodiversity finance planning and **add** the need to finance their development and implementation in the supporting text.

- **Amend** Headline indicators 19.0.1 and 19.0.2 to ensure that these measure *new*, additional and effective financing, to keep in line with needing new money in order to close the biodiversity financing gap.
- Add an indicator tracking the number of countries that have developed and are implementing National Biodiversity Finance Plans.

Target 20 on information sharing

We are glad to see the inclusion of this target on evidence and welcome the inclusion of both the rights and role of IPLCs. Evidence and information sharing is essential in tackling global biodiversity challenges. However, the target wording is confusing, and could be interpreted as being exclusively about traditional knowledge and not inclusive of other types of knowledge such as more formal, structured forms of scientific evidence. It is widely accepted that cost-effective decision making should use the full range of evidence available, hence, we are suggesting a re-wording to make this explicit. Furthermore, this target's monitoring elements must cover the indicators used for tracking CBD progress, and not just biodiversity information. This means making openly available reliable and up-to-date information related to all indicators used to assess progress to CBD targets and goals at national resolution to allow government and civil society assessment of progress and shared learning of lessons as to what works. The CBD must be open and transparent.

Current text

Target 20. Ensure that relevant knowledge, including the traditional knowledge, innovations and practices of indigenous and local communities with their free, prior, and informed consent, guides decision making for the effective management of biodiversity, enabling monitoring, and by promoting awareness, education and research.

Recommended text

Target 20. Ensure that relevant **evidence relating to biodiversity, which includes** the traditional knowledge, innovations and practices of indigenous and local communities (**provided** with their free, prior, and informed consent), **is available and is integrated into** decision-making for the effective management of biodiversity, **and that** monitoring, **research**, **education and information exchange build on that evidence**.

Target text

- Add wording to include "evidence relating to biodiversity" to the beginning, to make it clearer that this target is about all forms of evidence, including the more formal, scientific evidence, alongside traditional knowledge.
- **Retain** the text recognising traditional knowledge, innovations, and practices of indigenous and local communities, alongside the provisions for principles of free, prior, and informed consent.
- Add the need to make this evidence "available" and to "integrate" it into decision making which is clearer than the current vague language of "guides decision making"
- **Amend** the second part of the sentence to make it more easily readable and clear that monitoring, education, and information exchange build from evidence.

- **Further develop** the Headline Indicator 20.0.1 "Indicator on biodiversity information and monitoring, including traditional knowledge, for management", being clear that this includes the availability and integration of scientific evidence.
- **Retain** the complementary indicators t19.3 "Proportion of know species assessed through the IUCN Red List" and t19.4 "Number of assessments on the IUCN Red List of threatened species"

• Add a complementary indicator: "Number of countries in which comprehensive national Key Biodiversity Areas assessments have been updated using the KBA global standard"

Target 21 on participation and rights

For this target to be effective it must be clear that participation in the decision-making process is from the outset, that this participation is full and effective as well as equitable, and recognises the multiple forms which such participation takes, such as 'informing' or 'empowering'. It must also reflect and help implement the growing call for the universal right to a safe, clean, healthy, and sustainable environment.

Current text

Target 21. Ensure equitable and effective participation in decision-making related to biodiversity by indigenous peoples and local communities, and respect their rights over lands, territories and resources, as well as by women and girls, and youth.

Recommended text

Target 21. Ensure **the recognition and implementation of the right to a healthy environment, and full,** equitable and effective participation of women and girls, youth indigenous peoples and local communities in decision-making **and implementation** related to biodiversity, and **uphold** their rights over lands, territories, and resources.

- Add 'full' as to qualify the need for a process of 'free, prior, and informed, consent,' as a fundamental part of participation.
- **Amend** to include a reference to implementation to ensure the inclusion of these constituencies in both decision-making and the implementation of decisions.
- Add 'uphold' to replace 'respect' to ensure that collective rights are not only respected but also actively promoted throughout the framework.
- Add the need to ensure the recognition and implementation of the right to a healthy environment as a fundamental action required to deliver the framework as a whole and in particular Goal B. The number of countries recognising the right to a healthy environment in their laws and constitutions has been evaluated by the UN Special Rapporteur on the environment and human rights and can be used as a preliminary indicator.
- Amend the target, its components, and indicators to promote enabling conditions and the establishment, implementation and monitoring of appropriate legal and policy frameworks and other measures that:
 - Guarantee human rights in the implementation of the post-2020 Global Biodiversity Framework, including the right to a safe, clean, healthy and sustainable environment and access to justice;
 - Respect, recognise and integrate the use of traditional knowledge, innovations, and practices of Indigenous Peoples and local communities, women, girls and youth;
 - o Support and protect environmental human rights defenders; and
 - Guarantee 'full and effective' participation throughout the design, decision-making and implementation of the post-2020 Global Biodiversity Framework.