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# Feedback on the Updated Zero Draft of the Post-2020 GBF

Joint NGO Discussion Paper on Annex to [CBD/POST2020/PREP/2/1](#) (January 2021)

## Background and Scope

Our organisations welcome the publication of the updated zero draft. The post-2020 Global Biodiversity Framework must be a comprehensive plan and spur all sectors of society and governments into ambitious, urgent, and transformative action. Indeed, the document states that *'The framework is built around a theory of change which recognizes that urgent policy action globally, regionally and nationally is required to transform economic, social and financial models (...)'*. Furthermore, it lists important principles, such as a rights-based approach, intergenerational equity, the full and effective participation of Indigenous Peoples and local communities, and the need for synergies.

Whilst we strongly support these essential components of a successful framework, we believe that the document falls short of providing a framework for transformative change needed to reverse biodiversity loss by 2030 and to achieve the vision of living in harmony with nature. In some instances, the updated draft is even less ambitious than the original zero draft, published ahead of OEWG-2. For example, we find the draft targets inadequately address the drivers of biodiversity loss, in particular on food and agriculture systems, as well as gender.

This discussion paper presents specific recommendations or proposals for selected elements of the updated zero draft with a view to addressing more effectively the aspirations described in the theory of change. We hope that these proposals are useful for the negotiations on these particular elements of the framework. We note that these are consensus recommendations; individual organizations may also provide more specific or detailed input and recommendations.

This discussion paper does not purport to achieve a comprehensive and thorough review of the draft framework as a whole. Such a review would go well beyond editing of the zero draft as it stands. For example, we have identified a number of important gaps in the draft, including with regards to the drivers of biodiversity loss such as agriculture and food systems, fisheries, infrastructure and the financial sector and, overarching all of these, humanity's unsustainable environmental footprint. We also believe that the framework needs to better integrate the rights-based approach and that the finance related aspects require a more comprehensive and ambitious approach that includes ambitious actions to align financial flows with biodiversity conservation. We will be sharing our proposals to address these gaps and other important issues in more detail on other occasions. For now, we are focusing on suggestions that can be addressed through relatively simple edits.

Our organizations look forward to working with Parties towards the adoption of an ambitious and evidence-based post-2020 Global Biodiversity Framework that builds on global momentum for an equitable recovery from the COVID-19 pandemic that is nature-positive by 2030 and carbon neutral by 2050 (if not sooner).

We welcome opportunities for further exchange about the framework and our discussion paper, either in writing to any or all of the email addresses provided below, or via a virtual meeting, for which we would kindly ask you to contact Carly Siege from Conservation International at [csiege@conservation.org](mailto:csiege@conservation.org).

**A list of contacts for each organization is provided on the final page of this document.**

## Specific Recommendations

### 2030 Mission *Section C*

- **Amend** to replace the phrase “put biodiversity on a path to recovery” with “reverse biodiversity loss,” and make this the focus of the 2030 Mission.

### 2050 Goals and 2030 Milestones *Section B and D*

#### **Goal A: Conservation of Biodiversity** *Section B, Paragraph 10(a); Section D, lines A.1, A.2*

##### **Ecosystems**

- **Retain** the references to, and monitoring components for, all three aspects of natural ecosystems: area, connectivity and integrity.
- **Retain** ‘at least 5% increase’ in the A.1 Milestone for 2030.
- **Add** a requirement for “net gain” in *each* or *all* of the three ecosystem attributes described above, so as not to enable exclusive focus on one attribute in reporting and review.
- **Add** a commitment at the 2030 Milestone level to halt the loss of natural ecosystems within protected areas, Indigenous lands and territories contributing to biodiversity conservation, and in other critical areas for biodiversity, such as Key Biodiversity Areas and highly intact ecosystems.
- **Add** a clear baseline<sup>1</sup> for the overall goal, or for its components, or identify a small number of headline indicators with agreed baselines.
- **Amend** monitoring components to retain and improve indicators focusing on the state of ecosystems (rather than process-oriented indicators).

##### **Species**

- **Retain** the references to, and monitoring components for, the three measures of species conservation: trends in species extinctions, trends in species extinction risk (measured by Red List Index), and trends in species population abundance (as measured by Living Planet Index).
- **Amend** the 2050 Goal to replace “while reducing the number of species that are threatened by [X%]” with “while preventing human-induced species extinctions.”
- **Remove** the [X%] quantifiers from all 2050 goal text, but retain for 2030 milestones (to avoid repetition and potential confusion).
- **Amend** the current 2030 Milestone A.2 to read “human-induced species extinctions are halted, the overall risk of species’ extinctions is reduced by at least 20%, and the population abundance of species has increased on average by 20%.”
- **Amend** to specify that species in this context refers to native species, or at least excludes non-native (or “alien invasive”) species.

#### **Goal B: Nature’s Contributions to People** *Section B, Paragraph 10(b); Section D, lines B.1, B.2*

- **Retain** the references to key ecosystem services for human wellbeing, including nutrition and food security, safe drinking water and disaster risk reduction.
- **Add** additional references in the Goal or Milestones on nature’s contributions to climate change mitigation and adaptation, human health and sustainable development.
- **Add** reference in Goal or Milestones to conservation, sustainable management and restoration of areas that provide ecosystem services.

<sup>1</sup> Based on the approach proposed in CBD/SBSTTA/24/3add.1, para 23

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- **Add** that benefits must be fairly and equitably shared, contributing to the realization of the right to a safe, clean, healthy and sustainable environment and stable climate for all, and significantly reducing the risks to human health.
- **Amend** the 2050 Goal, 2030 Milestones *and* 2030 Action Targets, and all associated monitoring components, to ensure that:
  - ecosystem services organized either by category of services/benefits (e.g. food, water, health), or by services as identified by the IPBES Global Assessment; and
  - there is alignment between the types of ecosystem services identified in the 2050 Goal and 2030 Milestones and those identified in 2030 Action Targets.
- **Amend** 2030 Milestone B.2 to address the need to align financial flows with the GBF's goals and targets
- **Add** to Milestone B.1 "by reducing by half the footprint of production and consumption."

## **Goal C: Access and Benefit Sharing** *Section B, Paragraph 10(c)*

- **Amend** to reinsert the reference to traditional knowledge as included in the zero draft.
- **Amend** Milestone C.1 to establish that by 2030, access to and utilisation of genetic resources and associated traditional knowledge is legal and sustainable.
- **Amend** Milestone C.2. so that by 2030 benefits from this utilisation have not only increased significantly, but are also shared fairly and equitably.

## **Goal D: Means of Implementation** *Section B, Paragraph 10(d); Section D, lines D.1, D.2*

- **Amend** the 2050 Goal to provide a clearer, more specific, and measurable global commitment to substantially increase the financial means of implementation (see below), as well as other means of implementation such as capacity building, technology transfer and scientific cooperation.
- **Add** a reference in the 2050 Goal and 2030 Milestones to the need to "close the biodiversity finance gap" by successfully reducing or redirecting incentives and expenditures that are harmful for biodiversity while substantially increasing those with positive impacts for biodiversity. Further detail is provided in draft Targets 17 and 18.
- **Amend** 2030 Milestone D.1 to specifically address the need for Parties to develop national biodiversity finance plans by 2024, as part of a broader effort to update national plans and strategies in light of the global biodiversity framework.
- **Amend** 2030 Milestone D.2 to focus on the need to close the global biodiversity finance gap by 2030 (see above).

## **2030 Action Targets** *Section E*

### **Target on Spatial Planning, Land/Sea Use Change and Ecosystems** *Paragraph 12(a), Target 1*

- **Add** language from the original zero draft on "net gain" of natural ecosystems. We note that spatial planning alone as an exercise is not sufficient -- it must be designed to lead to improvements in conditions and increase in extent of natural ecosystems, with the ultimate aim to achieve the sustainable, equitable and effective management of 100% of land, freshwater, coastal and marine ecosystems.
- **Amend** the "[50%]" qualifier to instead set a target for 100% of land, freshwater, coastal and marine areas.
- **Add** language to specify that spatial planning processes should be: a) multi-sectoral; b) biodiversity-inclusive (i.e. include biodiversity layers) and ecosystem-based; and c) developed equitably and transparently.
- **Retain** language and components on intact areas and wilderness, but **remove** "most of the" in front of "existing."

- **Add** “and key areas for biodiversity and connectivity” after “wilderness.”
- **Add** a baseline for highly intact areas/wilderness, either in the target or through the monitoring framework.
- **Remove** “allow to” before “restore” to make language on restoration more ambitious.
- **Amend** to refer to “land, freshwater, coastal, and marine” ecosystems where the target discusses restoration of natural ecosystem types (consistent with the recommendation throughout).
- **Retain** language specifying that this target focuses on outcomes for natural ecosystems.
- **Add** a substantial, quantitative target for an increase in the total area of degraded ecosystems to be restored, and focused on increasing connectivity and restoring areas of particular importance for biodiversity and globally important ecosystem services.

### Target on Area-Based Conservation Measures *Paragraph 12(a), Target 2*

- **Retain** the “at least 30%” target for protection and conservation through area-based measures.
- **Retain** language on connectivity and effective management.
- **Amend** “30% of the planet” to read “30% of land, freshwater, coastal and marine” areas.
- **Retain** the existing focus on areas particularly important for biodiversity, such as Key Biodiversity Areas (KBAs), and Ecologically or Biologically Significant Marine Areas (EBSAs), but **add** “also prioritizing those areas providing globally important ecosystem services.”
- **Add** language that systems of protected areas and OECMs should be ecologically representative (from Aichi Target 11).
- **Add** language that these areas should be equitably managed, as well as recognize all of the rights and contributions of IPLCs, including respect of their right to Free Prior and Informed Consent.
- **Add** language specifying that protected areas and OECMs counted towards this target should prohibit harmful industrial extraction, and all activities should be undertaken in accordance with international best practices and legal frameworks.

### Target on Species Conservation Actions *Paragraph 12(a), Target 3*

*Note: Consider moving the element of this target about human-wildlife conflict to another target to focus this target on species conservation actions.*

- **Retain** the existing references to ‘active management actions’ and the recovery of species, focusing this target on conservation action rather than sustainable use.
- **Amend** to prioritize active management actions for “threatened” species and “species in need of intensive recovery actions” for whose survival depends on it or whose recovery cannot otherwise be enabled or sustained.
- **Amend** to replace “enable” with “ensure,” thereby strengthening the target.
- **Amend** to include recovery of “all wild species.”
- **Add** “strengthening coexistence by” prior to the text “reducing human-wildlife conflict.”
- **Amend** the “[xx]” qualifier with to read: “at least [50%].”

### Target on Legal, Sustainable and Safe Exploitation, Trade and Use *Paragraph 12(a), Target 4*

- **Amend** to replace the term “harvest” with the term “offtake,” or “exploitation” in line with IPBES Global Assessment.
- **Amend** to explicitly address both direct and indirect harvest [or preferably exploitation/offtake] (e.g. bycatch).
- **Amend** to clarify or define “safe” harvest (or preferably exploitation/offtake), trade and use in a post-COVID-19 world, including through the use of One Health approaches, as endorsed by CBD, and consideration of the IPBES report and others in terms of the role of wildlife trade in pathogen spillover.
- **Add** a reference to the urgent need to address both supply and demand of illegal wildlife products.



## Target on Invasive Alien Species *Paragraph 12(a), Target 5*

- **Remove** “where possible” before control.
- **Amend** the “[50%]” qualifier before the rate of new introductions proportion of priority sites to be 100%, thereby strengthening the ambition of this target to address a critical threat.
- **Add** “and, where possible, reverse existing impacts, with particular reference to vulnerable ecosystems such as small islands.”

## Target on Pollution *Paragraph 12(a), Target 6*

- **Amend** to clarify how “levels harmful to biodiversity” will be defined, and how the bracketed percentages relate to this definition.
- **Amend** to replace “reduce” at the beginning of the target with “prevent, control and minimise”.

## Target on Climate Change Mitigation and Adaptation *Paragraph 12(a), Target 7*

- **Retain** the three aspects of this target on climate change (mitigation, adaptation, disaster risk reduction).
- **Retain** the reference to “nature-based solutions,” in accordance with the IUCN definition that encompasses climate change mitigation, adaptation and resilience, and the need to protect the most vulnerable ecosystems and most marginalised peoples.
- **Remove** the reference to “ecosystem-based approaches,” a term that has been used differently over time in the CBD context, and which is generally captured under the broader definition of “nature-based solutions.”
- **Amend** to ensure that nature-based solutions are biodiversity positive.
- **Amend** to replace the term “minimize” with “avoid” --- the goal is to avoid negative impacts from either climate change or nature-based solutions on both biodiversity and people.
- **Add** specific quantitative commitments to make the mitigation, adaptation and disaster risk reduction elements of this target more SMART, for example an amount of GHG/carbon dioxide equivalent in emission reductions and enhanced sinks provided by nature based solutions.
- Ensure that monitoring components or the implementation framework in Section H evaluate the maximization of potential for nature-based solutions in NBSAPs.



### Target on Sustainable Management of Wild Species *Paragraph 12 (b), Target 8*

*Note: Noting the recommendation below to focus Target 9 on agricultural and food systems, Target 8 may provide specific direction to the management and sustainable use of wild species in sectors such as forestry and fisheries.*

### Target on Productive Ecosystems Managed for Sustainable Use *Paragraph 12(b), Target 9*

- **Retain** the references to productivity, sustainability and resilience of biodiversity in managed ecosystems, including in particular the specific reference to agricultural systems.
- **Amend** to focus this target on transforming agriculture and other food systems.
- **Amend** to make the first part of this target more SMART, through e.g. a proportion or area of land using regenerative agroecology, conservation agriculture, Indigenous food systems or agrobiodiversity techniques. Ensure that the elements of sustainable and biodiversity-friendly production are also measurable, not just closing productivity gaps as a stand-alone objective.
- **Add** “and around” before “managed ecosystems” to ensure that managed ecosystems are designed to contribute to the biodiversity of natural systems around them (e.g. through ecological connectivity).
- **Add** language on restoration of degraded agricultural lands.
- **Add** language on policy incentives to enhance sustainability of agricultural ecosystems and to reduce by 50% food waste and post-harvest loss.
- **Add** reference to large scale actions to protect and recover agrobiodiversity, pollinators and soil fertility and soil health.

### Target on Water and Air Quality, and Disaster Risk Reduction *Paragraph 12(b), Target 10*

- **Retain** the reference to “nature-based solutions,” in accordance with the IUCN definition that encompasses regulation of air quality, hazards and extreme events and quality and quantity of water, and the need to protect the most vulnerable ecosystems and most marginalised peoples.
- **Remove** the reference to “ecosystem approaches,” a term that has been used differently over time in the CBD context, and which is generally captured under the broader definition of “nature-based solutions.”
- **Amend** to clarify whether this target is referring to an “ecosystem approach” or an “ecosystem-based approach” to climate change adaptation and water security.
- **Add** language on the retention and restoration of natural ecosystems that provide ecosystem services related to water quality or pollution control/remediation, including through area-based measures.
- **Add** language referring to the need to significantly scale up nature-based solutions for water/air quality and disaster risk reduction.

### Target on Economic Reform, including the Private Sector *Paragraph 12(c), Target 13*

- **Amend** to explicitly reference the need for policy (legal, regulatory, incentives) approaches that support mainstreaming of biodiversity in the public and private sectors.
- **Add** language that explicitly identifies those sectors most responsible for biodiversity loss according to the IPBES Global Assessment (e.g. agriculture, fisheries, forestry, infrastructure, extractives/mining).
- **Add** finance as a key sector where biodiversity must be mainstreamed, including both public and private finance aiming for an alignment of public and private financial flows with the goals and targets of the framework
- **Add** a reference to biodiversity-inclusive strategic environmental assessments and/or biodiversity and social safeguards for all investments to avoid unintended or perverse outcomes for biodiversity and people.
- **Add** language to develop and implement sector-specific and inclusive national, regional and global plans of action to transition to a sustainable, just and nature-positive circular economy.



## Target on Supply Chains *Paragraph 12(c), Target 14*

- **Retain** the reference to sustainable supply chains.
- **Add** language in the target specifically addressing international trade, and to make production, trade and supply chains not only sustainable but also legal and equitable.



## Target on Sustainable Consumption *Paragraph 12(c), Target 15*

- **Amend** to shift the focus onto bringing consumption and resource use, and not consumption patterns, within a level the planet can sustain.
- **Add** language and measures to:
  - A. Reduce global net consumption of all materials (minerals, metals & non-metals) by 40%, and making material consumption patterns more equitable;
  - B. Reduce the use of primary biomass sources (wood and crops) for energy production by 50%, bringing the overall biomass demand down by 15.5%; and
  - C. Adopt policies and measures to encourage demand for green products and services and stimulating the large-scale adoption of circular economy and business models.

## Target on Economic Incentives and Subsidies *Paragraph 12(c), Target 17*

- **Amend** to replace the phrase “most harmful subsidies” with “all harmful subsidies” to avoid subjective implementation and increase the ambition of this target. All harmful incentives and subsidies should be eliminated, or redirected/re-purposed to be positive for biodiversity, by 2030.

## Target on Resource Mobilisation *Paragraph 12(c), Target 18*

- **Amend** language on overall increase in financial resources to focus on the need for a substantial increase from all sources to effectively close the ‘biodiversity finance gap’ in line with the proposal above for Goal D.
- **Add** “public and private” following “all international and domestic sources.”
- **Amend** to include a specific quantitative target for a 100% increase in concessional finance flowing from developed countries to developing countries by 2025, to be maintained until at least 2030.
- **Add** a reference to national biodiversity finance plans, and identify finance for their development and effective implementation by 2024.
- **Add** language specifying that positive investments in biodiversity should be “incentivized and supported by appropriate development strategies, fiscal policies, and the efficient and synergetic utilization of financial resources.”

## Target on Information and Traditional Knowledge *Paragraph 12(c), Target 19*

- **Amend** to include a reference to “free, prior and informed consent” as part of a full and effective participation of IPLCs with respect to the use of traditional knowledge, as included in the zero draft.

## Target on Stakeholder Engagement *Paragraph 12(c), Target 20*

- **Amend** the target 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 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;
  - Support and protect environmental human rights defenders; and
  - Guarantee 'full and effective' participation throughout the design, decision-making, implementation and monitoring of the post-2020 Global Biodiversity Framework, in particular of Indigenous Peoples and local communities, women and girls and youth in biodiversity-related decision-making and implementation that affects their livelihoods and resources.
- **Add** a target to implement the whole-of-society approach including through setting up or strengthening representative multi-stakeholder and multi-sectoral platforms on biodiversity, and other such mechanisms that bring together the public and private sectors and civil society at all levels and that ensures coordination, transparency and effectiveness for the implementation of the framework.





### **Implementation Support Mechanisms** *Section F*

#### **Resource Mobilization** *Paragraph 13(a)*

*Note: Comments under Goal D and Targets 13, 17 and 18 are highly relevant to resource mobilization.*

- **Amend** to clarify what is meant by an “enhanced financial mechanism” in paragraph 13(a)(i), potentially by specifying specific changes to the existing financial mechanism and/or increases in the amount of resources available.
- **Amend** paragraph 13(a)(ii) to refer to the “elimination,” rather than just “reduction,” or redirecting of resources causing harm to biodiversity.
- **Add** a requirement for the financial mechanism to support the development and implementation of national biodiversity finance plans, alongside other national strategies and action plans.
- **Add** a reference to a quantitative global commitment for developed countries to support the implementation of the Convention in developing countries through concessional financial flows, in line with Goals, Milestones and Targets.
- **Add** a reference to achieve alignment of financial flows with biodiversity conservation.

### **Responsibility and Transparency** *Section H*

#### **Implementation mechanism** *Paragraphs 15 to 18*

- **Add** language at the end of paragraph 15 to outline that “timely input” should also inform the ratcheting up of the implementation of national biodiversity strategies, action plans, and commitments.
- **Amend** paragraph 16 to strengthen language on coordination and coherence at global and national level with targets, indicators, and reporting against other relevant conventions and policy processes, in particular the biodiversity-related conventions and SDGs.
- **Amend** paragraph 18(a)(i)(b) to require the translation of all global targets into equally SMART national targets and associated NBSAPs, with accompanying milestones to track national progress as part of adequately resourced implementation strategies.
- **Add** a paragraph 18(a)(i)(f) that addresses the need for Parties to adopt national biodiversity strategies and plans as whole-of-government documents and/or enshrine all of their contents in the appropriate national legal frameworks.
- **Amend** paragraph 18(a)(ii) to define headline indicators as a standardized, core set of indicators that the CBD Secretariat and Parties report against in line with the reporting requirements/schedule.
- **Amend** paragraph 18(b)(i) to require transparency and develop (some core elements of) consistency across national report formats.
- **Amend** paragraph 18(b)(ii) and (c)(i) to require regular reviews of implementation, with a periodic stocktake assessing collective progress against goals and targets;
- **Add** at the end of paragraph 18, after (c)(iii), language about the establishment of a structured, time-bound process for ratcheting up the implementation of national plans and commitments following each global stocktake.



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