

CONSERVATION INTERNATIONAL'S POLICY RECOMMENDATIONS – NAIROBI NEGOTIATION

June 2022

Key recommendations for the First Draft of the Global Biodiversity Framework

1. Ensure prioritization of conservation, sustainable use and/or restoration for the places most important for providing nature's contributions to people including ecosystem services. We highlight new scientific developments allowing for the identification of which places provide the highest levels of services globally and at national levels.
2. Increase level of ambition to create transformational change to reach a nature positive state by 2030.
3. Agree to sufficient and comprehensive resources to finance the full implementation of the Post-2020 Framework.
4. Ensure the full, effective, and equitable participation of Indigenous peoples and local communities (IPLCs) in all GBF related processes and adhere to a human rights-based approach that strengthens rights for all.
5. Prevent pandemics by addressing upstream drivers of spillover of pathogens from animals, particularly wildlife, to people while respecting the rights of IPLCs.

General Comments on the “Geneva Draft”

The move to text-based negotiations of the [post-2020 Global Biodiversity Framework \(GBF\)](#), was a positive development in Geneva, however, much work remains to be done to create a streamlined, easy to understand and communicable version prior to COP 15. This position paper summarizes new scientific developments that allow us to identify the places providing the highest levels of ecosystem services at global and national levels and suggests how to best use these scientific developments in the goals and targets of the GBF. If we want to sustain nature's many contributions to humans then these places must be prioritized for conservation, sustainable use and/or restoration in the GBF.

To further strengthen GBF, we offer these high-level recommendations:

(1) Prioritize action in the places that provide nature's contributions to people

Nature provides a range of goods and services to people, such as supporting economic growth, sustaining livelihoods, and providing the basis for food, water, and climate security. These are collectively described here as ecosystem services or “Nature's Contributions to People” (NCP). Parties were unable to reach consensus on the use of either or both of these terms, so for the purposes of this paper, they will be referred to collectively as “NCP including ecosystem services.”¹

¹ One potential avenue for addressing the divergence of views on the use of the terms “ecosystem services” and “nature's contributions to people” could be to refer to them collectively in the GBF as “Nature's Contributions to People including ecosystem services”.

We recommend that goal B and targets 8, 10 and 11 of the GBF be restructured so that they explicitly call for the conservation, sustainable use, and/or restoration of the **places most important for delivering nature's contribution to people including ecosystem services**.

Nature's Contribution to People	Ecosystem Services examples	Post-2020 GBF	National & global maps of the places most important for providing these services	Replicable methodology available?
Food	<ul style="list-style-type: none"> • Pollination • Grazing • Riverine and marine fish • Access to marine and terrestrial areas for recreation and gathering of resources 	Target 9 Target 10	Available in Chaplin-Kramer, et al., Nature's Critical Natural Assets. <i>In peer review</i> .	Yes
Water	<ul style="list-style-type: none"> • Nitrogen retention • Sediment retention • Flood regulation and coastal risk reduction 	Target 11	Available in Chaplin-Kramer, et al., Nature's Critical Natural Assets. <i>In peer review</i> .	Yes
Climate	<ul style="list-style-type: none"> • Climate change mitigation provided by high carbon ecosystems 	Target 8	Available in Noon, M.L., Goldstein, A., Ledezma, J.C., Roehrdanz, P., Cook-Patton, S.C., Spawn-Lee, S.A., Wright, T.M., Gonzalez-Roglich, M., Hole, D.G., Rockström, J., & Turner, W.R. Mapping the irrecoverable carbon in Earth's ecosystems. <i>Nature Sustainability</i> 5 , 37-46 (2021). https://doi.org/10.1038/s41893-021-00803-6 .	Yes

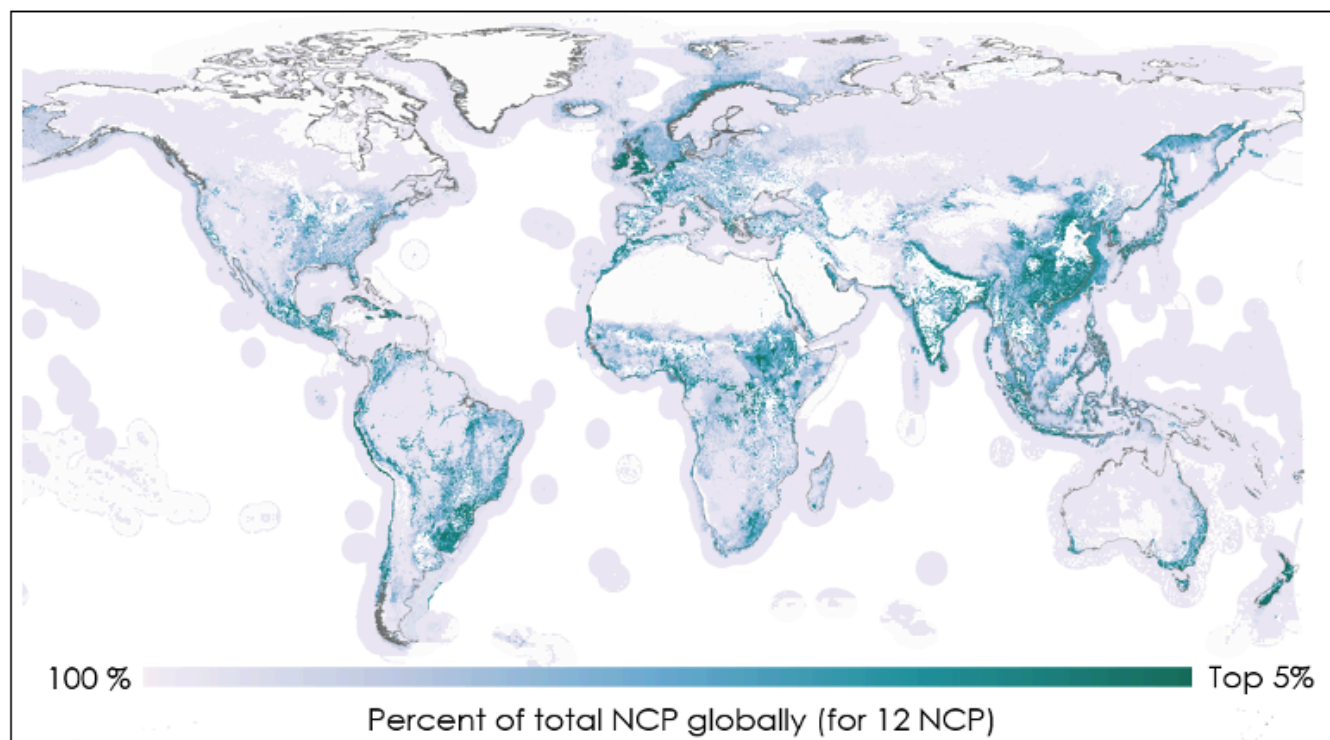
Knowing where to take action is key to this approach. Recent scientific advances have produced maps of the global distribution of ecosystems providing services² related to water quality regulation (nitrogen, sediment), food provision (pollination, grazing, riverine and marine fish), timber and fuel production, flood regulation and coastal risk reduction, and access to marine and terrestrial areas for recreation and gathering of resources. These maps allow us to know nature's contribution to people including ecosystem services. Maps showing the global distribution of irrecoverable carbon, the carbon in ecosystems that must be maintained to meet global climate goals, were recently published in the November 2021 issue of *Nature Sustainability*.³ The maps are available for decision makers to explore at the [Conservation Resilience Atlas](https://irrecoverable.resilienceatlas.org/).⁴

² Chaplin-Kramer, et al., Nature's Critical Natural Assets. In peer review. Pre-print available here: <https://www.researchsquare.com/article/rs-1102108/v1>.

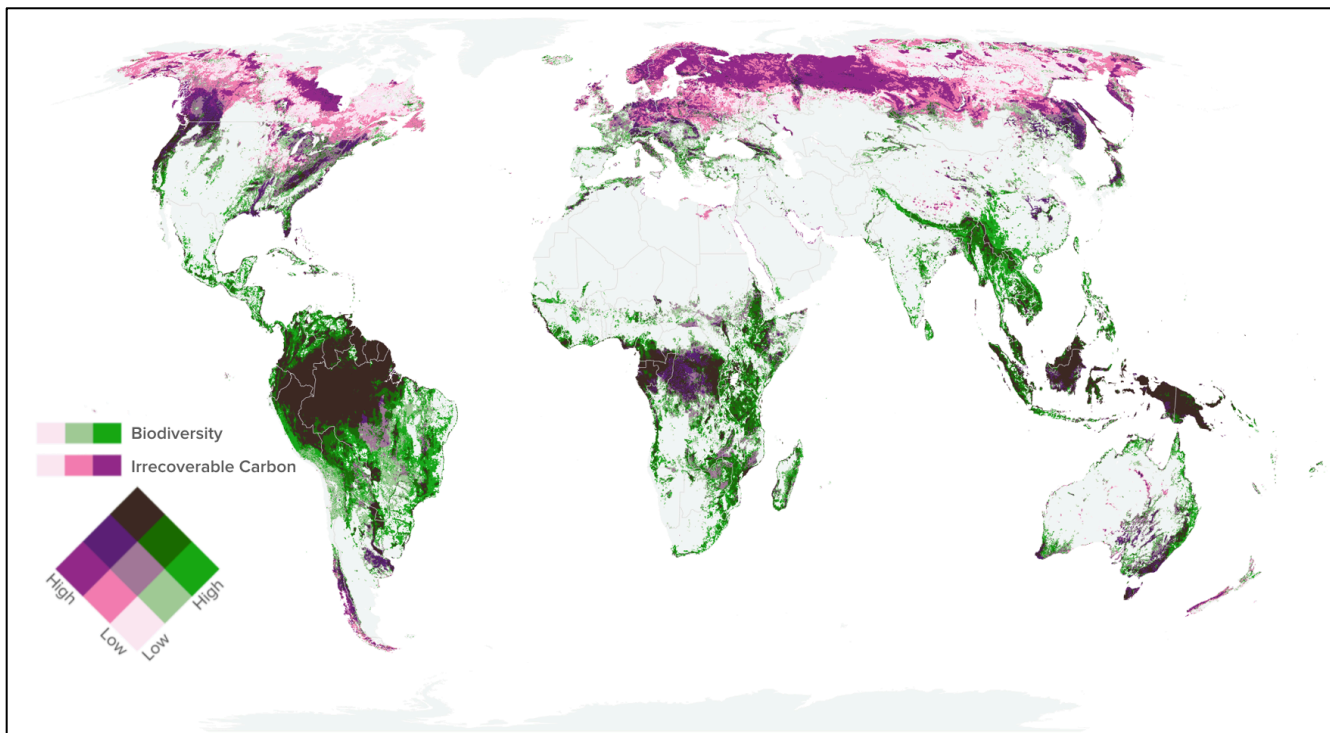
³ Noon, M.L., Goldstein, A., Ledezma, J.C., Roehrdanz, P., Cook-Patton, S.C., Spawn-Lee, S.A., Wright, T.M., Gonzalez-Roglich, M., Hole, D.G., Rockström, J., & Turner, W.R. Mapping the irrecoverable carbon in Earth's ecosystems. *Nature Sustainability* **5**, 37-46 (2021). <https://doi.org/10.1038/s41893-021-00803-6>. Goldstein et al. 2020. Protecting the irrecoverable carbon in Earth's ecosystems. *Nature Climate Change*. <https://www.nature.com/articles/s41558-020-0738-8>.

⁴ Full URL available here: <https://irrecoverable.resilienceatlas.org/>.

This information can be used to guide choices for how different resources are managed to ensure that these places remain healthy—both at global and national scales.



Critical Natural Assets – Global assessment: Source: Chaplin-Kramer et al, *in prep. Global critical natural assets. bioRxiv 2020.11.08.361014*; doi: <https://doi.org/10.1101/2020.11.08.361014>.



Global Irrecoverable Carbon & Biodiversity. Source: Noon et al. 2021 for Irrecoverable Carbon. BirdLife and IUCN Red List spatial data for birds, mammals, amphibians, and reptiles

Application to Implementation – These maps can be used in conjunction with other existing datasets, allowing decision makers to prioritize in their National Biodiversity Strategies and Action

Plans the conservation, sustainable use and/or restoration of places based on their desired sets of criteria. For example, the map shown above overlays the global distribution of irrecoverable carbon with biodiversity habitat ranges of all known birds, mammals, amphibians, and reptiles, collected by hundreds of scientists over decades. In this case, 75% of irrecoverable carbon and habitat for 87% of threatened terrestrial vertebrate can be found in **less than 14% of Earth's land**⁵ This type of analysis could be utilized to determine if the existing network of protected areas in a country includes a high proportion of biodiversity with high levels of irrecoverable carbon.

These types of analyses can guide choices for how different resources are managed to ensure that we maintain the places we most need for our own wellbeing and to support a transition to a greener and more resilient model of economic development. Protecting and conserving at least 30% by 2030 must be combined with applying effective sustainability measures across the remaining 70% of the planet. At the national level, the most important areas for species, ecosystems and ecosystem services should be prioritized. Then, based on considerations of risk or sensitivity, decisions can be made on how to proceed in terms of conservation, management or restoration for these areas.

Examples include:

- Upland and upstream forests and other water source areas that contribute to the provision and regulation of water for local and downstream uses may be conserved while still allowing certain kinds of sustainable use;
- Peatlands that hold irrecoverable carbon may require strict protection to ensure that the emissions are not released to the atmosphere; and
- Mangroves that act as nurseries for fisheries and that provide coastal protection can be conserved through community management that also allows for other uses. Also, areas of degraded coastal mangroves could be prioritized for restoration based on the important coastal protection services the restored area is likely to provide.

(2) Increase overall ambition for transformational change

We continue to recommend an increase in the level of ambition for creating the transformational change needed to ensure that there is no net loss of biodiversity by 2030. This increase in ambition is consistent with the high ambition of the UN Climate Change Convention and takes into account the strong synergies between the biodiversity and climate crises as the recent IPBES-IPCC report details.⁶ While ambitious targets for the state of biodiversity are important, we will not succeed in reaching a nature positive world⁷ if we do not also set targets addressing the underlying economic drivers of biodiversity loss.

⁵ Goldstein, A., Noon, M., Ledezma, J.C., Roehrdanz, P., Raghav, S., McGreevey, M., Stone, S., Shrestha, S., Golden Kroner, R., Hole, D., & Turner, W. (2021) Irrecoverable Carbon: The places we must protect to avert climate catastrophe. Report. Conservation International. DOI: 10.5281/zenodo.5706060.

⁶ Pörtner, H.O., et al. (2021) IPBES-IPCC co-sponsored workshop report on biodiversity and climate change. https://ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf.

⁷ Nature-positive means halting and reversing nature loss by 2030, measured from a baseline of 2020, so that by 2030 nature is visibly and measurably on the path of recovery, and by 2050, nature must recover so that thriving ecosystems and nature-based solutions continue to support future generations, the diversity of life and play a critical role in halting runaway climate change. (Locke, et al. (2020) A Nature-Positive

We encourage Parties to increase ambition on these topics as they enter the last rounds of negotiations and ensure that they maintain and strengthen targets on the integration of biodiversity values into decision making, economic incentives and subsidies. Mainstreaming biodiversity considerations into different sectors and engaging all relevant stakeholders including Ministries of Finance, Agriculture and others as well as the private sector will be essential for ensuring this ambition can be achieved.

(3) Ensure funding and capacity building

The Geneva round of negotiations highlighted the need for clear and time-bound agreement on how to finance the framework in order to ensure the successful conclusion of the GBF process. With the agreement that an estimated USD700 billion is required annually to close the biodiversity financing gap,⁸ there is still the need to consider how a range of investments will be committed and directed. Overseas development aid (ODA) will be an important part of any financing agreement, however, ODA will not be enough – domestic financing and increased mobilization from businesses and the financial sector will be essential, while also simultaneously reducing expenditures on activities and subsidies harming biodiversity and increasing positive incentives as well as more efficient use of existing resources. National Biodiversity Finance Plans will also be an important tool to help facilitate these components.

(4) Ensure inclusive participation and human rights-based approach

Indigenous peoples and local communities (IPLCs) are critical partners in biodiversity stewardship, caring for areas across the globe containing significant biodiversity. IPLCs are central to the success of the development and implementation of the framework. Therefore, the entire framework must ensure the full, effective, and equitable participation of IPLCs in the implementation of the GBF and all related processes and adhere to a human rights-based approach that strengthens rights for all. Currently, the draft falls short of fully incorporating a human rights-based approach. The promotion of human rights should be included as an enabling condition, the right to a healthy environment should be retained in goal B as suggested in Geneva and specific considerations integrated into a number of targets as outlined below.

(5) Address upstream drivers of pathogen spillover to prevent pandemics

A clear body of evidence shows that most emerging infectious diseases are the result of spillover of pathogens from animals, particularly wildlife, to humans because of the exploitation of nature and wildlife.^{9,10} Outbreaks, epidemics, and pandemics can be prevented, however, through implementation of evidence-based preventative measures. This will require actions to decrease human and domestic animal contact with wildlife specifically by 1) stopping land use change that drives infectious disease emergence, especially the clearing and degradation of tropical forests;

World: The Global Goal for Nature.

<https://f.hubspotusercontent20.net/hubfs/4783129/Nature%20Positive%20The%20Global%20Goal%20for%20Nature%20paper.pdf>.)

⁸ Paulson Institute. (2020) Financing Nature: Closing the Global Biodiversity Financing Gap. <https://www.paulsoninstitute.org/key-initiatives/financing-nature-report/>.

⁹ Jones, K., Patel, N., Levy, M. et al. Global trends in emerging infectious diseases. *Nature* 451, 990–993 (2008). <https://doi.org/10.1038/nature06536>.

¹⁰ Plowright, R. K., Reaser, J. K., Locke, H., Woodley, S. J., Patz, J. A., Becker, D. J., Oppler, G., Hudson, P. J., & Tabor, G. M. (2021). Land use-induced spillover: A call to action to safeguard environmental, animal, and human health. *The Lancet Planetary Health*, 5(4). [https://doi.org/10.1016/s2542-5196\(21\)00031-0](https://doi.org/10.1016/s2542-5196(21)00031-0).

2) shutting down or strictly regulating commercial wildlife trade and markets that contribute to zoonotic spillover, particularly commercial trade in birds and mammals, while respecting the rights of IPLCs; and 3) improving infection control during animal husbandry. These activities can be implemented with massive return on investment compared to the millions of lives and trillions of dollars lost from pandemics such as COVID-19.¹¹

Detailed recommendations on Conservation International's priority goals and targets are below in relation to the Geneva outcome text of GBF – [CBD/WG2020/3/L2](#)

Detailed Recommendations on the Global Biodiversity Framework

2030 MISSION

Recommended Text: To achieve a nature positive world by 2030 by halting and reversing nature loss, for the benefit of the planet and people.

Current Text: To [take][catalyze the necessary means of implementation to support] urgent[, ambitious] [and transformative] action across society to [halt and reverse biodiversity loss and achieve a [biodiversity [net] gain for a nature-positive world][[net] gain for biodiversity][nature-positive world][conserve and sustainably use biodiversity[, including restoration] and ensure the fair and equitable sharing of benefits from the use of genetics resources], [to put biodiversity on a path to recovery] [achieve a nature-positive world] by 2030] [contributing to the Sustainable Development Goals] [for the benefit of planet and people][, supporting sustainable development and addressing inequalities among and within societies] [by 2030]”.

Alt 1. Zero [net] loss of nature from 2020, [net] positive by 2030, and full recovery by 2050 – for the benefit of all people and life on Earth.

Alt 2. By [2030][2050] halt and reverse the loss of biodiversity and put nature on a [fair and equitable] path to recovery for the benefit of [present and future generations][all people and the planet].

Alt 3. Act now to [conserve][protect], restore, use sustainably, and fund for [reversing biodiversity loss][achieving a [net] gain for biodiversity and] for the benefit for planet and people.

Comments:

- We support the joint calls for amending the 2030 Mission to have a clearly communicable focus on reversing biodiversity loss and achieving the nature-positive state by 2030.¹² The multiple variations of the mission statement emerging from the Geneva negotiation need

¹¹ Dobson, A. P., Pimm, S. L., Hannah, L., Kaufman, L., Ahumada, J. A., Ando, A. W., Bernstein, A., Busch, J., Daszak, P., Engelmann, J., Kinnaird, M. F., Li, B. V., Loch-Temzelides, T., Lovejoy, T., Nowak, K., Roehrdanz, P. R., & Vale, M. M. (2020). Ecology and economics for pandemic prevention. *Science*, 369(6502), 379–381. <https://doi.org/10.1126/science.abc3189>.

¹² Locke, H., et al. (2021) A Nature-Positive World: The Global Goal for Nature (White Paper).

<https://f.hubspotusercontent20.net/hubfs/4783129/Nature%20Positive%20The%20Global%20Goal%20for%20Nature%20paper.pdf>.

to be consolidated into short easy to understand formulation that commits to reversing declines in biodiversity by 2030.

2050 Goals

Sections B and D

GOAL B

Recommended Text: Alt 1. Nature's contributions to people including ecosystem services are valued, enhanced and maintained through conservation, restoration and sustainable use *especially in the places most important for delivering these contributions*, supporting the global development agenda for the benefit of all present and future generations and the right to a clean, healthy and sustainable environment.

Current Goal B:

Alt 1. Nature's contributions to people [, including ecosystem services] are valued, enhanced and maintained through conservation, restoration and sustainable use supporting the global development agenda for the benefit of all [present and future generations] [and the right to a clean, healthy and sustainable environment].

Alt 2. Biodiversity is sustainably used and managed [ensuring the long-term integrity of ecosystems], and [nature's contributions to people][, including] ecosystem services are valued, maintained and enhanced, achieving sustainable development [with those ecosystem services currently in decline being restored by 2030] [[in an equitable manner] and achieving a reduction of ecological footprint [in an equitable manner] of [X%] by 2030 and of [Y%] [within planetary boundaries by 2050.¹³] [and [the fulfilment of all human rights including] the right to a clean, healthy and sustainable environment].

Comments:

- We have suggested changes to **goal B Alt 1** to make clear the long-term sustainability of **nature's contributions to people including ecosystem services is delivered through a combination of conservation, sustainable use, and/or restoration**.
- The places most important for delivering essential nature's contributions to people including ecosystem services must be kept healthy. To achieve this, the GBF will need to specify a focus on places of highest priority and specify actions needed to maintain them. Without this approach, areas critical to the health and well-being of millions of people may be overlooked.
- This approach to implementation is similar to the model of identifying Biodiversity Hotspots or Key Biodiversity Areas to facilitate prioritizing conservation actions.
- Focusing interventions on areas that have been identified as important for species or ecosystem representation as well as vital ecosystems services can support a more efficient investment of effort.

¹³ Pending the need for consideration of numerical aspects for all the goals (A to D). Furthermore, there is no hierarchy among the goals. Numbers are indicative and have not been discussed ([CBD/WG2020/3/L.2](#))

- In terms of monitoring, we recommend countries monitor the extent and condition of these places and the flow of ecosystem services that they provide in alignment with the UN System of Environmental Economic Accounting (SEEA).¹⁴
- In October 2021, the UN Human Rights Council voted resoundingly for [Resolution HRC 48/13](#), recognizing the human right to a clean, healthy, and sustainable environment and we recommend that this right is also reflected in goal B of the GBF.

GOAL D

Recommended Text: The *USD700 billion* 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 with the goals and targets of the post2020 global biodiversity framework *to achieve a nature-positive world* by 2030.

Current Goal D: [In accordance with Article 20 of the Convention] [Building on past investments,] [By 2050,] [Address] the [biodiversity finance] gap [between available financial resources [from all sources] and other means of implementation, and those necessary] to achieve the 2050 Vision and the goals and targets of the post2020 global biodiversity framework [is closed], [prioritizing a significant increase in public resources, and through direct access modalities] [and by 2030,] resources from all sources have been significantly increased [including non-financial means of implementation [by \$X by 2030 and \$Y by 2050][by % of GDP and used efficiently and effectively], [financing harmful to biodiversity is] [reduced by \$X by 2030][and [eliminated] by 2050]] and enhance capacity building and development, technical and scientific cooperation, and technology transfer, and [all financial resources][public and private financial flows] are aligned with [the 2050 Vision and the goals and targets of this framework [and effective mainstreaming of biodiversity across all policies and sectors [across all national levels] is achieved]] [biodiversity objectives][CBD objectives].

Alt 1. [Building on past investments,] National and international public and private financial flows are aligned with the [post-2020 global biodiversity framework and the] Vision of Living in Harmony with Nature, [and in ways consistent with nature-positive, carbon neutral, and pollution-free development pathways] harmful flows have been [[identified],[reformed or [eliminated]] removed][reduced], resources from all sources [, including non-financial means of implementation] have been increased, and efficiently deployed, biodiversity values have been mainstreamed [across all policies and sectors] [enhance the capacity building and development, technical and scientific cooperation, and technological transfer], and the necessary enabling policies, transparency requirements, and other means of implementation have been secured.

Alt 2. [Building on past investments,]The gap between available financial resources [from all sources] and other means of implementation necessary to achieve the [2050 Vision[and the targets of the post-2020 global biodiversity framework]] [post-2020 global biodiversity framework] is [closed][, in an efficient and effective way][national and international public and private financial flows are aligned with the 2050 Vision][and in ways consistent with nature-positive, carbon neutral, and pollution-free development pathways]] [addressed] [, including by

¹⁴ In this paper, SEEA refers to both the overall SEEA system of statistics and the Ecosystem Accounting framework.

[significantly and progressively] increasing financial resources, capacity building, [technical assistance] and technology transfer [and the effective mainstreaming of biodiversity across all policies, sectors and national levels] provided for implementation in developing countries]].

Alt 3. Adequate [means of implementation and] resources [numerical values to be added] to fully implement the GBF are secured [from all sources] and are accessible to all Parties [in accordance with Article 20 of the Convention] [with public and private financial flows aligned with the 2050 Vision][and in ways consistent with nature-positive, carbon neutral, and pollution-free development pathways].

Alt 4. The 2050 Vision of Living in Harmony with Nature is achieved with the support of the [global biodiversity fund], [significantly and progressively] increasing multilateral financial resources, capacity-building and technology transfer provided for developing country Parties.

Comments:

- The USD700 billion finance gap originally referenced in the milestone of the first draft must be included in the formulation of goal D. We note that the **successful implementation of the GBF will require filling this gap by securing solid and sustainable financing from a variety of sources, efficiently using existing resources, and redirecting or halting public and private financial flows that are harmful to biodiversity**. Maintaining a specific quantitative reference to this goal will help provide specificity.
- Goal D should reflect a holistic approach to closing the financing gap, including a significant increase in finance from all sources for the implementation of the framework, and eliminating public and private financial flows that are harmful to biodiversity. The language should clearly state both the increase in financial resources and the alignment of public and private financial flows with biodiversity objectives.
- Resourcing for capacity building should be made available both to Parties as well as to stakeholder groups such as women and IPLCs given their important role in conservation and management.

2030 Action Targets: Section E

Reducing threats to biodiversity

TARGET 1 (Spatial Planning)

Recommended Text: Ensure that all freshwater, marine and terrestrial areas globally are under integrated biodiversity-inclusive, *equitable and transparent* spatial planning processes addressing land- and sea-use change, retaining existing intact natural ecosystems, key biodiversity areas and the places most important for delivering nature's contributions to people including ecosystem services and respecting the rights of Indigenous Peoples and local communities.

Current Target 1: [Ensure that [all]/[at least X%] [[terrestrial, [inland water,][and] freshwater, marine [and coastal]]/[land and [sea]/[ocean]] areas]/[ecosystems] globally are under [effective management processes, including] integrated biodiversity[-driven and]-inclusive [and



participatory] [landscape-level] spatial planning [and/or effective management processes][, improving connectivity], [to minimize the impact of sectors responsible for]/[addressing] land- [freshwater-] and sea-use change, [and that unavoidable impacts from infrastructure is minimized] [retaining [existing] [intact [ecosystems and]/[and wilderness areas[, including [primary forests] [threatened, primary ecosystems]]], including] [areas of high biodiversity [value]/[importance]] [and the places most important for delivering ecosystem [functions and] services]/[nature's contributions to people]]/[enhancing the sustainable management of natural ecosystems and the capacity to [map, monitor and assess, on a regular basis, the provision of]/[provide] ecosystem [functions and] services], [improving connectivity,] [sustaining ecosystem [functions and] services, avoiding fragmentation, and reducing pressures on vulnerable ecosystems] [, in the context of sustainable development and poverty eradication,]/[and taking into account]/[in line with] sovereign rights and][national circumstances] [and respecting the [customary] rights of Indigenous Peoples and local communities][, in accordance with national legislation[and international obligations]]].

Comments:

- Spatial planning processes can be an important tool for managing risk to biodiversity from changes in use of land and marine systems, but only if the spatial planning aims to support the health of ecosystems as a primary aim as opposed to using spatial planning to advance non-sustainable outcomes, such as monoculture crops or environmentally degrading development practices. Therefore, target 1 should be amended to clarify that the spatial planning is “biodiversity-inclusive” We agree that the reference to intact and wilderness areas and areas of high biodiversity values should be retained and are pleased to see the **retention of the places most important for providing benefits to people/ecosystem services.**
- We support interventions from several Parties intended to ensure that the rights of IPLCs, who traditionally govern and steward biodiversity, be appropriately recognized and secured. We remain committed to the proposals for specific references to rights-based approaches in target 1, as well as “equitable governance” and Free, Prior, and Informed Consent.

TARGET 3 (Area-Based Conservation Measures)

Recommended Text: Ensure that at least 30 per cent globally of terrestrial, freshwater and marine ecosystems, especially areas of particular importance for biodiversity and ecosystem services, are effectively conserved through well-managed and equitably governed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures that prohibit environmentally-damaging activities, are integrated into the wider landscapes and seascapes, and ensure the rights of IPLCs in accordance with UNDRIP and international human rights law.

Current Target 3: [Ensure that][ecosystems, habitats and the biodiversity they contain are maintained and restored by conserving]]/[enable] at least [30 per cent] [globally][, at the national level,] of [terrestrial, [and] [freshwater]/[inland water] and marine [and coastal] areas] [land areas



and of [[sea]/[marine]areas]/[the ocean]], respectively]], [inclusive of areas that are already protected and conserved,] especially areas[, at the national level,] of particular importance for biodiversity and [ecosystem [functions]/[services] and] [its contributions to people], are [effectively] conserved [and sustainably used] through [effectively]/[well-] managed and equitably governed, ecologically representative and well-connected [systems]/[networks] of protected areas and other effective area-based conservation measures [that prohibit environmentally-damaging activities], [including indigenous territories, when applicable,] and integrated into the wider land[-]/[scapes] and seascapes [and national and regional ecological networks], [while ensuring that sustainable use of these areas, if in place, contributes to biodiversity conservation,] [recognizing the contribution of IPLCs to their management, and ensuring the rights of IPLCs in accordance with UNDRIP and international human rights law]] bearing in mind]/[recognizing] that national contributions to this global target will be decided according to national priorities and capabilities, in accordance with the principles of the Rio Declaration, with adequate safeguards for the rights of IPLCs and the rights to development, will not affect the rights or ability of all Parties to access financial and other resources required for the effective implementation of the whole GBF] [giving effect to]/[respecting]/[ensuring]/[with full respect for human rights, including]/[fully respecting and upholding] the rights of Indigenous Peoples and local communities, [including their land and territories]], including the right to prior and informed consent, free prior and informed consent and approval]], in light of national circumstances and with respect for national legislation].

Comments:

- There is overwhelming scientific evidence and support from over 90 Parties for the call to protect and conserve at least 30% of global land, ocean, and freshwater areas by 2030.
- We are encouraged to see the added **focus on areas most important for delivering nature's contribution to people including ecosystem services**, in line with Aichi target 11, and recommend that the final text maintain this formulation.
- We are also supportive of retaining the focus on the integration into wider landscape and seascapes in this target on area-based conservation.¹⁵
- We recommend retention of the phrase “prohibit environmentally-damaging activities” so that there is a clear prohibition of harmful industrial or non-industrial activities within protected areas and other effective conservation measures.
- We support interventions from several Parties intended to ensure that the rights of IPLCs, who traditionally govern and steward biodiversity, be appropriately recognized and secured.
- We support retaining the text that “ensures the rights of Indigenous peoples and local communities in accordance with United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and international human rights law.”

TARGET 5 (HARVESTING AND TRADE OF WILD SPECIES)

¹⁵ Murphy, SE, Farmer, G, Katz, L, et al. (2021) Fifteen years of lessons from the Seascape approach: A framework for improving ocean management at scale. <https://conbio.onlinelibrary.wiley.com/doi/10.1111/csp2.423>.

Recommended Text: Ensure that the exploitation, trade and use of wild species is sustainable, legal, effectively regulated and enforced, and poses no risk of pathogen spillover to humans, wildlife, or other animals, *all while respecting the rights of IPLCs.*

Current Target 5: [Prevent overexploitation by ensuring]/[Ensure] that [any]/[the] [harvesting]/[exploitation], [[captive] breeding]/[farming], trade and use of terrestrial, [and aquatic]/[[freshwater]/[inland water] and marine and coastal], wild [animal and plant] species[, including eggs, fries, parts and derivatives], is sustainable [and legal] [and safe for target and non-target species] [effectively regulated] [and traceable], [minimizing impacts on non-target species and ecosystems] [without adverse effects on the populations of species], [and safe for [[human], [animal and plant]] health]/[and poses no risks of pathogen spillover to humans, wildlife or other animals] [and for all living beings on mother Earth]], [and prevent and eliminate biopiracy and other forms of illegal access to and transfer of genetic resources and associated traditional knowledge], while [respecting]/[protecting] customary [rights and] sustainable use [of IPLCs] [and preventing pathogen spillover], [applies [ecosystem-based approaches]/[the ecosystem approach] to management] [and creating the conditions for the use and provision of benefits for IPLCs] [and take urgent action to address both demand and supply of illegal wildlife products].

Comments:

- Conservation International supports the intent of this target to address the threats posed to biodiversity, ecosystems, and human health and wellbeing from unsustainable or unsafe exploitation and use of wild species. However, further clarification is needed to ensure the GBF reflects the actions that can be taken to avoid threat of future pandemics of zoonotic origin while respecting the rights of IPLCs.
- The science strongly suggests that the COVID-19 pandemic originated in wildlife and spilled over to people; new scientific studies provide further evidence that the spillover happened in a live market. To date it has cost more than USD12 trillion and more than 6 million people have died, but another zoonotic pandemic could be even worse.
- We urge Parties to apply the precautionary principle and the latest scientific evidence by calling for the **elimination of all exploitation and trade of wildlife that is not legal and well regulated, or which is ecologically and biologically unsustainable, or which poses any risk to the health of humans, wildlife, or other animals, particularly from pathogen spillover.**

Meeting people's needs through sustainable use and benefit-sharing

General Comments:

- The proposed text suggestions follow the assumption that to meet people's food, water and climate benefits, the ecosystems that provide these services need to be maintained for the long term.
- We note that the focus on sustainable use alone may not be sufficient to ensure long-term benefits from a wide variety of ecosystem services, especially those that are non-material. Therefore, we **recommend targets 8, 10 and 11 below be restructured so they**

clearly articulate that the action needed is the “conservation, sustainable use, and/or restoration of the places most important for delivering nature’s contributions to people including ecosystem services.”

- Research supporting this prioritization is presented in the overview section of this document. We note that this research methodology can be utilized at the national level to assist with National Biodiversity Strategy and Action Plan (NBSAP) updates and conservation and land use planning.
- As mentioned in the goal B section above, the current structure of targets 8, 10, and 11 does not support a consistent approach to implementation or monitoring efforts related to nature’s contributions to people. The revised approach supports a focus on **measuring the extent, condition and integrity of places supporting benefits to people.**

TARGET 8 (Meeting People’s Climate Needs)

Recommended Text: Minimize the impact of climate change on biodiversity, contribute to mitigation, adaptation and resilience including through nature-based solutions and ecosystem-based approaches,¹⁶ *focusing on high carbon ecosystems; contribute at least 10 GtCO_{2e} per year to global mitigation efforts* and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.

Current Target 8: Minimize the impact of climate change on biodiversity, contribute to mitigation, adaptation and resilience including through [nature-based solutions] and [ecosystem-based approaches], and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.

Comments:

- We recommend that Target 8 **prioritizes action in high carbon ecosystems that are essential for mitigation and also contribute to adaptation efforts.** We consider the general term of “high carbon ecosystems” to be inclusive of areas which contain irrecoverable carbon found in ecosystems such as tropical and boreal forests, peatlands and as well as blue carbon ecosystems such as mangroves, salt marshes and seagrass beds.
- Based on the recent UNEA resolution¹⁷ we understand nature-based solutions and the ecosystem approach to be inclusive of conservation, sustainable management, and restoration actions.
- We support the focus on ensuring that all mitigation and adaptation efforts avoid negative impacts on biodiversity. Wherever possible, these activities should optimize biodiversity co-benefits.
- The initial round of negotiations in Geneva on target 8 resulted in the removal of the quantifiable element of the target calling for contributions from nature to climate change

¹⁶ As indicated in the footnote for Target 11 in CBD/WG2020/3/L2, the ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way (decision V/6).

¹⁷ United Nations Environment Assembly of the United Nations Environment Programme. (March 2022) Resolution adopted by the United Nations Environment Assembly on 2 March 2022. <https://wedocs.unep.org/bitstream/handle/20.500.11822/39752/K2200677%20-%20UNEP-EA.5-Res.5%20-%20Advance.pdf?sequence=1&isAllowed=y>.

mitigation of 10 GtCO₂e per year. Removing this quantifiable element reduces the ambition of the target since simply “contributing” to mitigation, adaptation and resilience is a very requires very little action. It also reduces the ability to evaluate progress on this target.

- We note that the 10 GtCO₂e per year originally included in the target is a science-based estimate of the cost-effective climate mitigation potential from nature, assuming the social cost of CO₂ pollution is ≥100 USD MgCO₂e by 2030.¹⁸ Complementary analyses confirm that nature-based solutions have a total abatement potential of 10.2 GtCO₂ per year by 2030, and an easy-to-achieve “practical potential” of close to 7 GtCO₂.¹⁹

TARGET 10 (Sustainable Production)

Recommended Text: Ensure that all areas used for agriculture, aquaculture, fisheries, forestry and other productive uses are managed sustainably and contribute to the long term productivity and resilience of these systems, prioritizing the conservation, sustainable use and restoration *especially in the places most important for providing* nature’s contributions to people including ecosystem services *that support these productive uses*.

Current Target 10: [Ensure that [all] areas under agriculture, aquaculture, [fisheries], forestry [and other productive uses] are managed sustainably, in particular through the sustainable use of biodiversity; contributing to [the long term] [efficiency, productivity] and resilience of these systems, conserving and restoring biodiversity and maintaining [its ecosystem services] [nature’s contribution to people, including ecosystem services]].

Comments:

- We remain concerned that the target does not address the state of the places that provide the ecosystem services that underpin and support production systems such as pollination services, fish breeding areas, water quality and quantity, among other services. Therefore, we suggest the necessary action to achieve these benefits accrued from agriculture, aquaculture and forestry is the **conservation, sustainable use, and/or restoration of the places most important for delivering nature’s contributions to people including ecosystem services**.
- We support a wider use of conservation actions than a singular focus on sustainable use because sustainable use alone may not be sufficient to ensure long-term benefits from a wide variety of ecosystem services, especially those that are non-material such as soil formation, erosion control or pollination but that support these productive systems. In addition to conservation and sustainable management, **we support the suggestions of many Parties to add restoration to the list of actions in the target**.

TARGET 11 (Meeting People’s Water & Air Needs)

Recommended Text: *The places most important for delivering* nature’s contributions to people, including ecosystem service such as clean air, clean water and disaster risk reduction

¹⁸ Griscom et al. (2017) Natural climate solutions. <https://www.pnas.org/content/114/44/11645>.

¹⁹ WEF. (2021) Nature and Net Zero. https://www3.weforum.org/docs/WEF_Consultation_Nature_and_Net_Zero_2021.pdf.

are maintained or restored through nature-based solutions and ecosystem based approaches that benefit all people and nature.

Current Target 11: [Restore, maintain and enhance ecosystem functions and services [nature's contributions to people, including ecosystem functions and services,] such as regulation of air and water, soil health, [pollination], [climate], as well as protection from natural hazards and disasters through [nature-based solutions²⁰ and ecosystem-based approaches²¹], [rights-based approaches and mother earth centered actions] [through payment for environmental services] for the benefit of all peoples and nature.]

Comments:

- We remain concerned that the target does not refer to the state of the places in nature that provide services such as clean air and water and protection from hazards such as extreme weather events. These services are highly dependent on the state of the ecosystems that provide them. The services cannot be expected to be delivered in isolation from the ecosystems. We therefore **recommend an approach to target 11 where the places most important for providing ecosystem services are maintained or restored** through the actions of nature-based solutions and ecosystem-based approaches.
- We support the use nature-based solutions and ecosystem-based approaches as they are inclusive of a broad array of approaches from conservation to sustainable use to restoration depending on the case-by-case need in a place.

Tools and solutions for implementation and mainstreaming

TARGET 18 (Economic Incentives and Subsidies)

Recommended Text: By 2025 identify and by 2030 eliminate at least US\$ 500 billion per year of all direct and indirect subsidies harmful for biodiversity and as appropriate, redirect to nature-positive activities.

Current Target 18: [Identify,] [redirect, repurpose to nature-positive activities, domestically and internationally,] [Eliminate,] [substantially] phase out or reform incentives harmful for biodiversity, [including all harmful subsidies] [in a just, effective and equitable way,] [in a manner consistent with WTO rules,] [taking into account national socio-economic conditions,] [while substantially and progressively] reducing them [by at least US\$ 500 billion per year], including all of the most harmful subsidies, [and ensure that financial savings are channeled to support biodiversity prioritizing the stewardship of IPLCs, smallholder producers, and women]] and ensure that positive incentives[, including public and private economic and regulatory incentives,] are scaled up, consistent and in harmony with the Convention and other relevant international obligations.

²⁰ Nature-based solutions refers to “actions to protect, conserve, restore, sustainably use and manage natural or modified terrestrial, freshwater, coastal and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services and resilience and biodiversity benefits” (UNEP/EA5/L9/REV.1)

²¹ The ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way (decision V/6).



Alt 1 [Identify by 2025 and] [eliminate,] phase out [or reform] [all direct and indirect][subsidies] [incentives] harmful for biodiversity, [taking into account national socio-economic conditions,] [in a [proportionate,] just, effective and equitable way, [in a manner consistent with WTO rules,] [while substantially and progressively] reducing them [at an absolute minimum] [annual spend] [by at least US\$ 500 billion per year,] [starting with the most harmful subsidies,]] [in particular fisheries and agricultural subsidies] [and[, as appropriate,] redirect and repurpose to nature-positive activities[, domestically and internationally,]] and ensure that [all] [positive] incentives [, including public and private economic and regulatory incentives,] are [either positive or neutral for biodiversity, including payments for environmental services] [scaled up]], consistent and in harmony with the Convention and other relevant international obligations].

Alt 2 [Identify] and eliminate[, redirect or repurpose to nature-positive activities,] incentives harmful for biodiversity including all harmful subsidies and ensure that positive incentives are scaled up[, consistent and in harmony with the Convention and other relevant international obligations].

Comments:

- The reform of subsidies that contribute to biodiversity loss represents the single biggest opportunity to close the biodiversity funding gap by stopping spending on things that are harmful to biodiversity.
- We recommend that this target introduces a **clear trajectory to deliver on the elimination of subsidies by adding the phrase “Identify by 2025”**.
- As much as USD542 billion per year is currently spent on agricultural, fisheries and forestry subsidies that are harmful for nature,²² so the aim to reduce them by at least USD500 billion per year is appropriate.
- This USD500 billion is part of closing the USD700 billion financing gap, leaving the need for an additional USD200 billion in new funding for biodiversity every year.

TARGET 19.1 (Financial Resources)

Recommended Text: *Close the biodiversity funding gap by* increasing financial resources from all sources by reaching at least [US\$ 200 billion per year] by 2030, including new, additional, innovative and effective financial resources by increasing international financial flows to developing countries and *Indigenous peoples and local communities by* at least [US60 billion per year], leveraging private finance and increasing domestic resource mobilization taking into account national biodiversity finance planning or similar instruments.

Current Target 19: [[In accordance with Article 20 of the Convention,] [Progressively] Increase [annual] financial resources [from all [public and private] sources] [by] [reaching] [at least] [US\$ 200 billion per year] [by X% global GDP, in accordance with the OECD Outlook to 2030,] [by 1% GDP] by 2030,] including new, additional, innovative and effective[, timely and easily accessible] financial resources by (a) [progressively] increasing [new and additional] international [public financial resources from [developed countries][countries with capacity to do so]] [financial flows]

²² TNC. (2020) Closing the Nature Funding Gap: A Finance Plan for the Planet. <https://www.nature.org/en-us/what-we-do/our-insights/perspectives/closing-nature-funding-gap-global-biodiversity-finance/>.



to developing countries [in need of support to deliver on their NBSAPs in light of their capacities] [and IPLCs] [through direct access modalities] [reaching] [by] at least [US\$ 10 billion per year [at an increasing percentage]] by 2030 [in form of international grants [to developing countries]], [acknowledging common but differentiated responsibilities,] (b) leveraging private finance, (c) [progressively] [increasing] [doubling] domestic resource mobilization [including through addressing sovereign debt in just and equitable ways] [by 1% GDP] [by 2030][, and [(d) establishing a new international financing instrument,] [(e) building on climate financing] while enhancing the effectiveness[, efficiency and transparency] of resource use and [developing and implementing] [taking into account] national biodiversity finance plans or [similar instruments] [the instrument developed to measure the dimension of the local biodiversity financial gap] [and/or the cost of implementation of NBSAPs].]

Alt 1 [In accordance with Article 20, developed country Parties shall provide X USD bn [per year] in new and additional financial resources to developing country Parties to meet the agreed full incremental costs of implementation of the post-2020 GBF, [including through increased funding for the Global Biodiversity Fund,] avoiding double counting, enhancing transparency and predictability, and stimulating payments for environmental services.]

Alt 2 [Increase financial resources for biodiversity from all sources, including domestic, international, public and private sources, aligning them with the post-2020 global biodiversity framework. Enhance the effectiveness, efficiency and transparency of such resources use[, through the use of national biodiversity finance plans or similar instruments].]

Comments:

- The current biodiversity funding gap is about USD700 billion per year,²³ therefore, this target must secure a level of ambition that is consistent with this challenge.
- We also note the important linkages between targets 18 and 19: the combination of new resources (USD200billion/year) and eliminating/redirecting negative financial flows and subsidies (USD500 billion/year) is crucial to close the funding gap (USD700 billion/year).
- Ambition in this target will be critical to the delivery of all other targets, as sufficient resources from both private and public sector sources will be essential to closing the gap on finance and capacity. We note that this dedicated target on financing with concrete figures must be part of a holistic approach to close the global biodiversity finance gap, along with reducing public and private financial flows harmful to biodiversity and increased efficiency and effectiveness of resources used.
- At least USD200 billion in new resources, above and beyond the existing levels of biodiversity focused financing will be needed to implement the GBF. This should be a collective global commitment from all sources, including domestic resource mobilization and private finance.
- The international financing flows from all sources including ODA must be ambitious enough to meet the resource needs of developing countries. Developed countries have

²³ TNC. (2020) Closing the Nature Funding Gap: A Finance Plan for the Planet. <https://www.nature.org/en-us/what-we-do/our-insights/perspectives/closing-nature-funding-gap-global-biodiversity-finance/>.

an additional responsibility for their biodiversity impacts due to their high levels of consumption and the biodiversity footprints embedded in goods and services imported from developing countries. Research has shown that 30% of global threats to biodiversity are generated by international trade, particularly trade in commodities destined for use in developed countries. As a result, a target figure of at least USD60 billion annually of international public finance for biodiversity, primarily in the form of grants, to developing countries would appropriately reflect the responsibility of developed countries. This level of investment, as part of an increase in overall ODA, is necessary for transformative change to achieve a green recovery from COVID-19 and the Sustainable Development Goals.

- Financial resources should also be allocated for IPLC led initiatives on biodiversity conservation and the plan for targeted capacity-building efforts must be inclusive of IPLCs.

TARGET 20 (Information and Traditional Knowledge)

Recommended Text: Ensure that quality information and knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, are available and accessible to decision makers, practitioners, and the public to guide decision-making for *equitable* governance, management and monitoring of biodiversity, and by strengthening communication, awareness-raising, education, research and knowledge management.

Current Target 20: Ensure that quality information and knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, are available and accessible to decision makers, practitioners and the public to guide decision-making for effective governance, management and monitoring of biodiversity, and by strengthening communication, awareness-raising, education, research and knowledge management.

Comments:

- We fully support this target given the importance of traditional knowledge, innovations and practices of IPLCs to the health and integrity of biodiversity, particularly because of the long-held custodial relationships that develop between indigenous peoples, local communities, and nature. We note that the treatment of traditional knowledge requires care that should adhere to safeguard principles²⁴ and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), as well as the site-specificity of traditional knowledge, such that no expectation exists that traditional knowledge can be transferred between different bio-cultural systems.
- Consideration should be given to the need to define clear, measurable means to ensure the protection of traditional knowledge.

TARGET 21 (Stakeholder Engagement)

²⁴ For example, see <https://www.greenclimate.fund/document/indigenous-peoples-policy>.

Recommended text: Ensure the full, equitable, effective and gender-responsive participation in decision-making and access to justice related to biodiversity by indigenous peoples and local communities, respecting their rights over lands, territories and resources, as well as by women and girls, and youth.

Current Target 21: Ensure the full, equitable, effective and gender-responsive participation in decision-making [and access to justice] related to biodiversity by indigenous peoples and local communities, respecting their rights over lands, territories and resources, as well as by women and girls, and youth, [while enhancing the engagement of all relevant stakeholders].

Comments:

- The role and engagement of IPLCs within the development and implementation of the post-2020 framework is critical, having significant impact not only on human rights but also the important areas of biodiversity and ecosystem services that are under the governance of IPLCs. We support processes and outcomes that recognize, respect and support IPLC knowledge and leadership.
- We also note that the 'full and effective' participation" is crucial and we recognize that participants should be engaged from the outset of decision-making, and across the period to 2030.

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