

Post-2020 Framework: A Transformational Approach

A Citizen Proposal to build back better with a strong and inclusive global biodiversity framework for everyone

Position paper SBSTTA-24/SBI-3 (April/May2021)

REFERENCE DOCUMENTS:

[CBD/SBSTTA/24/3](#): POST-2020 GLOBAL BIODIVERSITY FRAMEWORK: SCIENTIFIC AND TECHNICAL INFORMATION TO SUPPORT THE REVIEW OF THE UPDATED GOALS AND TARGETS, AND RELATED INDICATORS AND BASELINES.

[CBD/SBSTTA/24/3Add.1](#)
POST-2020 GLOBAL BIODIVERSITY FRAMEWORK: SCIENTIFIC AND TECHNICAL INFORMATION TO SUPPORT THE REVIEW OF THE UPDATED GOALS AND TARGETS, AND RELATED INDICATORS AND BASELINES PROPOSED INDICATORS AND MONITORING APPROACH FOR THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK



Document Summary:

In these pages you will find Avaaz's positions for this SBSTTA/SBI formal meeting.

On pages 5 and 6 you will find key suggestions to improve the Global Biodiversity Framework (GBF).

On pages 7 - 21 please find further detailed suggestions - presented goal by goal and target by target - for aligning the GBF with the latest available science.

Why we need to move beyond Zero Draft to meet the urgency of the Zero Hour

During the long road to Subsidiary Body on Scientific, Technical And Technological Advice (SBSTTA-24) formal meeting, Avaaz submitted comments on the [Zero Draft and its updated document](#)¹, reflecting views supported by millions of its members from all countries Part of the Convention on Biological Diversity, as well as from Avaaz staff, partners, and more than 400 indigenous peoples, local communities, and grassroots organizations from 100 different countries.

This document again exhorts what must by now be obvious: in order to halt biodiversity loss, restore ecosystems, and renew peoples' relationship with nature we must establish and ensure a resilient and sustainable global economy.

As obvious as these concepts might be, the GBF still needs further work to truly be inclusive, transversal to economic sectors and activities, and to ensure its ability to remain resourceful and innovative enough to include new ideas and schemes to meet challenges of implementation.† Given the impact on the global economy of the Covid 19 pandemic, it is essential that special attention be paid to implementation measures (including funding) as many poorer countries have become even more vulnerable to total economic collapse.

To begin with, the GBF must be based on solid science. It is the responsibility of delegates, special groups and observers taking part in this SBSTTA-24 and SBI-3 gatherings to ensure that the demands of science are always placed before those of politics and compromise.

It is the shared responsibility of the entire policy community gathering for these CBD negotiations to send a strong message to world leaders warning of the need to dramatically boost ambition on spatial targets. We must also make crystal clear that the inclusion of indigenous peoples and local communities (IPLC) will be essential at every step of the negotiation and implementation

process. Only by committing to spatial targets set by science, and active participation by IPLC, will we as a global community be able to ensure a green, equitable and sustainable planet for all.

Protection, conservation, and sustainable-use should be recognized as part of area-based measures. Implementation plans must take into account people's rights, needs and livelihoods. Afterall, we live on an inhabited planet and humans, along with all other species, form a natural part of Earth's ecosystems -both on land and at sea. The impact of people is especially true in areas where restoration, reconnection and mainstreaming approaches (which play a significant role in the evolving biodiversity) are implemented and should therefore be included in the Post-2020 Framework.

Regarding the 30% conservation target, we respectfully remind distinguished delegates, representatives of special groups and observers, that even the World Economic Forum commented back in 2019, referring to the [Global Deal for Nature](#)² (2019), that a 30% target is simply not sufficient. Given that terrestrial carbon sinks currently absorb a quarter of carbon emissions, scientists have concluded that if we are to remain below a 1.5°C warming scenario, we must designate an additional 20% of the planet as climate stabilization areas.

Furthermore, the following year the Global Safety Net (2020) concluded that 35.3% of land area (in addition to 15.1% of the land area currently protected) is needed to conserve sites of particular importance for biodiversity and ecosystem services, including the preservation of carbon sinks vital for limiting global warming to 1.5°C3: such two-year research effort, based on multiple global-scale data sets compiled into five main layers at a 1 km resolution, indicate that we need at least to protect or conserve species rarity sites (2.3%), high biodiversity areas (6%), large mammal landscapes (6.3%), intact wilderness (16%), and additional climate stabilization areas (4.7%), totaling 50.4% of the Earth's land area.

1 Avaaz Listening Document on the Global Biodiversity Framework (February 2021) <http://bit.ly/GBF-Avaaz-Listening-Document>

2 Dinerstein et al (April, 2019), A Global Deal For Nature: Guiding principles, milestones, and targets <https://advances.sciencemag.org/content/5/4/eaaw2869>

3 Dinerstein et al. (September, 2020). A 'Global Safety Net' to reverse biodiversity loss and stabilize Earth's climate" <https://advances.sciencemag.org/content/6/36/eabb2824>

Why we need to move beyond Zero Draft to meet the urgency of the Zero Hour

Avaaz is also convinced that a more ambitious area-based conservation target is possible. We also refer to a recent survey of over 335 conservation scientists from 81 countries done by the IUCN World Commission on Protected Areas' Beyond the Aichi Targets Task Force which reported "very strong support for large-scale percentage area conservation targets, in the order of 50 percent of the Earth."⁴ And also to another review of the literature published by a group of IUCN experts, in which the call for 50% of the Earth is a midpoint of these values and is supported by a range of studies⁵.

Also at the 2019 World Economic Forum⁶ it was widely broadcast that in order to achieve meaningful biodiversity and climate outcomes, the role of IPLCs as traditional stewards of their lands and livelihoods will be essential. Avaaz is content that IPLCs are now mentioned in the purpose of the updated Framework Zero Draft, and that a rights-based approach is at least mentioned when addressing its implementation.

Nevertheless, Avaaz would like to stress that any Post-2020 planning should go beyond the current simple mention at the very end of CBD COP decision of the full and effective participation of IPLC. Instead, IPLCs can and should be agents of environmental conservation, especially given the fact that although the territories of the world's 370 million indigenous peoples cover only 24% of land worldwide, they hold 80% of the world's biodiversity⁷. The GBF must therefore reflect the imperative strategic role played by IPLCs in in situ protection, conservation, and sustainable use of biodiversity, which have real implications for our global food, health, and ecological security. Their collaboration should be guaranteed and integrated across the entire Post-2020 Framework.

Avaaz also feels strongly that the statement in the GBF about goals and targets being subjected to "availability of resources" is no longer an option. The Post-2020 Framework can not be considered a nice to have, instead it is a scientifically-determined blueprint for stopping biodiversity loss and saving our planet. The money must be found. It is time to get the math right, so the equation is positive for all.

As stated before, by Avaaz and by so many different voices, the negative and damaging impact of harmful and perverse incentives to the environment, to natural resources, to biodiversity and to peoples' livelihoods, needs to be addressed⁸.

Avaaz is presenting a clear proposal to ground the mere mentioning of the need to reduce or redirect resources causing harm to biodiversity (paragraph 13 a (ii) and b (ii); paragraph 14 G e; Updated Zero Draft – CBD/POST2020/PREP/2/1), and to support developing countries and countries with economies in transition, to develop, utilize and retain requisite capacities and to learn, adapt and manage change, this by freeing and/or redirecting substantial financial resources to be used to support the implementation of the post-2020 targets.

⁴ Woodley, S et al, Area-based conservation beyond 2020: A global survey of conservation scientists (Parks, Vol 25.2 November 2019) See: <https://naturebeyond2020.com/wp-content/uploads/2019/10/Woodley-et-al-survey-PARKS-25.2-Proof-5.pdf>

⁵ Locke, H et al, A review of evidence for area-based conservation targets for the post-2020 global biodiversity framework (Parks, Vol 25.2 November 2019). See: <https://naturebeyond2020.com/wp-content/uploads/2019/10/Woodley-et-al-Targets-PARKS-25.2-proof-3.pdf>

⁶ World Economic Forum (April 2019) <https://www.weforum.org/agenda/2019/04/why-protect-30-planet-2030-global-deal-nature-conservation/>

⁷ Sobrevila, 2008; IPS, 2017

⁸ CBD/COP/DEC/XIII/3 and CBD/COP/DEC/14/3

Key Suggestions for Realigning the GBF with Science

Goals:

Avaaz suggests three key elements to align the GBF goals with scientific evidence

1. **Strengthen language on Goal A and add milestones for 2030 (suggested edits in green and suggested deletions in red):** “**No further loss by 2030** in the area, connectivity and integrity of **all** ecosystems, **with high importance for biodiversity or high ecological integrity**. Biodiversity will be increased by at least **[30%]** in said areas, supporting healthy and resilient populations of all species while **reducing eliminating the threats of human induced activities to the** number of species that are threatened by **[100%]** and maintaining genetic diversity”. (CBD/SBSTTA/24/3 Page 6)

2030 Milestones

(i) The area, connectivity and integrity of natural ecosystems increased by at least [5%].

(ii) The number of species that are threatened is reduced by [X%] and the abundance of species has increased on average by [X%].

(iii) The area and integrity of managed ecosystems, including ecosystems managed by IPLCs increased by at least [X%].

(iv) The number of socioeconomically and culturally valuable species that are threatened is reduced by [X%] and the abundance of socioeconomically and culturally valuable species has increased on average by [X%].

We also suggest adding as key indicators: (a) **Trends in conservation of socio-economically and culturally valuable species** and (b) **Trends in in situ conservation of plant and animal genetic resources for**

food and agriculture.

2. **Adding emphasis and *in totum* language in Goal D, and as well a new intermediate goal for 2025 to ensure proper identification and commitment of financial resources to implement the GBF (see suggested edits in green):** Means of implementation is available to achieve all goals and targets of the framework (CBD/SBSTTA/24/3 Page 7):

(i) By 2022, **all** means to implement the framework for the period 2020 to 2030 are **fully** identified or committed.

(ii) By 2025, all financial means necessary in order to implement the framework are fully identified or committed.

(iii) By 2030, **all** means to implement the framework for the period 2030 to 2040 are **fully** identified or committed.

We also suggest adding as key indicator: **International funding from different sources, including the IMF, for implementation of the GBF.**

3. **Adding a new goal to properly reflect traditional knowledge, which could be read as follows:** *By 2030, traditional knowledge, innovations and practices of Indigenous Peoples and local communities relevant for the conservation and sustainable use of biodiversity, and their customary use of biological resources, are fully integrated and reflected in the implementation of the GBF, taking into account and respecting the role of indigenous peoples and local communities as traditional stewards of their lands, resources, knowledge and livelihoods, at all relevant levels.*

Key Suggestions for Realigning the GBF with Science

Targets:

Avaaz suggests five key elements to optimize the current articulation of the GBF, in line with the last available science and technical evidence (based on our response⁹ to the monitoring framework and our initial feedback of the GBF¹⁰):

1. **Add a new target to reflect the goal, in line with recommendations from IPBES (Global Assessment 2019), which could be read as follows:** *Appropriately and legally recognize and protect against external threats at least 50 percent of collective lands, waters and territories of life of indigenous peoples and local communities by 2025, and 100 percent by 2030, in accordance with their self-determined governance systems, customary laws and community protocols, and free, prior and informed consent.*
2. **Elevate ambition on Target 1 (see edits suggestions in green):** By 2030, [~~100 percent~~ 50%] of land and sea areas globally are under **inclusive** spatial planning addressing land/sea use change, retaining most of the existing intact and wilderness areas, including key biodiversity areas, connectivity zones and other sites of biodiversity importance, and allow to restore [50 percent ~~X%~~] of degraded freshwater, marine and terrestrial ecosystems and connectivity among them. (CBD/SBSTTA/24/3 Page 7)
3. **Elevate ambition on Target 2 (see edits suggestions in green):** By 2030, protect and conserve through well connected and effective system of **equitably governed protected areas, including Indigenous and community conserved areas** and other effective area-based conservation measures at least ~~50~~ **30** percent of the planet with the focus on areas particularly important for biodiversity, **while respecting self-determined governance systems, customary laws and community protocols, and free, prior and informed consent.** (CBD/SBSTTA/24/3 Page 7)
4. **Bring more inclusive language on target 13 (see edits suggestions in green):** By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated **into inclusive and participatory** assessments of environmental **and social** impacts. (CBD/SBSTTA/24/3 Page 10)
5. **Elevate ambition on target 17 (see edits suggestions in green):** By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [~~100 percent X~~] reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity. (CBD/SBSTTA/24/3 Page 11)

⁹ Avaaz's response to the draft monitoring framework post 2020 GBF: [https://www.cbd.int/api/v2013/documents/ADDD8E4C-3759-0C38-4898-1385FB518A20/attachments/Avaaz\(1\).pdf](https://www.cbd.int/api/v2013/documents/ADDD8E4C-3759-0C38-4898-1385FB518A20/attachments/Avaaz(1).pdf)

¹⁰ Avaaz's Response to the Zero Draft of the Post 2020 Global Biodiversity Framework. <https://www.cbd.int/api/v2013/documents/87366F86-8CFB-ECFB-B594-64C9BD63AB6F/attachments/Avaaz-2.pdf>

Avaaz further detailed comments on Annex I of document [CBD/SBSTTA/24/3](#): Post-2020 Global Biodiversity Framework: scientific and technical information to support the review of the updated goals and targets, and related indicators and baselines ([from previous submission](#))

NOTE: In red and strikethrough are our suggestions for deletions, of, and in bold green our suggestions for amendments and/or additions.

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Goal A. The area, connectivity and integrity of natural ecosystems increased by at least [X%] supporting healthy and resilient populations of all species while reducing the number of species that are threatened by [X%] and maintaining genetic diversity</p> <p>2030 Milestones:</p> <p>(i) The area, connectivity and integrity of natural ecosystems increased by at least [5%]</p> <p>(ii) The number of species that are threatened is reduced by [X%] and the abundance of species has increased on average by [X%]</p> <p>(CBD/SBSTTA/24/3 Page 6)</p>	<p>We suggest the following language on Goal A: “No further loss by 2030 in the area, connectivity and integrity of all ecosystems, with high importance for biodiversity or high ecological integrity. Biodiversity will be increased by at least [30%] in said areas, supporting healthy and resilient populations of all species while reducing eliminating the threats of human induced activities to the number of species that are threatened by [100%] and maintaining genetic diversity”.</p> <p>2030 Milestones</p> <p>(i) The area, connectivity and integrity of natural ecosystems increased by at least [5%]</p> <p>(ii) The number of species that are threatened is reduced by [X%] and the abundance of species has increased on average by [X%]</p> <p>(iii) The area and integrity of managed ecosystems, including ecosystems managed by IPLCs increased by at least [X%]</p> <p>(iv) The number of socioeconomically and culturally valuable species that are threatened is reduced by [X%] and the abundance of socioeconomically and culturally valuable species has increased on average by [X%]</p>	<p>A general comment on Goal A: Avaaz is concerned that this goal is less ambitious than its predecessor in the zero draft of the GBF; originally the target was a 20% increase of connectivity and integrity of natural ecosystems (in response of the Zero Draft, Avaaz suggested an increase of at least 30%). On the other hand, the way this goal is articulated doesn't offer a clear baseline for these milestones.</p> <p>Last but not least, the word “reduction” implies a <i>de facto</i> acceptance of further decline or potential extinction of some species, therefore we suggest to replace that term and include the word “elimination” with regard to the actual threat of the species. We suggest parties consider the possibility of including a 2030 milestone on securing the recognition and protection of territories owned, managed and used by indigenous peoples and local communities, given the scientifically proven contribution that these territories can make to the achievement of Goal A.</p> <p>We suggest adding the following indicators:</p> <ul style="list-style-type: none"> - Trends in conservation of socioeconomically and culturally valuable species - Trends in <i>in situ</i> conservation of plant and animal genetic resources for food and agriculture

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<p>Goal B. Nature's contributions to people have been valued, maintained or enhanced through conservation and sustainable use, supporting the global development agenda for the benefit of all peoples.</p> <p>2030 Milestones:</p> <p>(i) Nature contributes to the sustainable nutrition and food security, access to safe drinking water and resilience to natural disasters for at least [X] million people.</p> <p>(ii) Nature is valued through green investments, ecosystem service valuation in national accounts, and public and private sector financial disclosure.</p> <p>(CBD/SBSTTA/24/3 Page 6)</p>	<p>We suggest the following language on Goal B: The benefits of nature's contributions to all people have been valued, secured, protected, maintained or and enhanced through conservation and sustainable use, supporting the 2030 Agenda for Sustainable global Development agenda for the benefit of all people and the support of other biodiversity-related multilateral agreements.</p>	<p>A general comment on Goal B: Overall, Avaaz notes a lack of clarity on hierarchies and consistency in the articulation of Goal B, its 2030 milestones, monitoring components, monitoring elements and indicators. The goal is too broad and needs a clearer and more detailed breakdown on milestones and consistency with monitoring components. We propose to focus this goal in safeguarding the benefits of nature for people and then adding an explicit mention of the Agenda 2030 and other instruments that will galvanize action. This goal should support (and be supported by) goals, targets and indicators across other biodiversity-related multilateral agreements, especially with the other two Rio conventions (UNFCCC and UNCCD). Furthermore, and in line with that which is expressed above, we suggest parties to consider, while sticking with specific mandates and responsibilities within the CBD, to further their effort to seek synergies and alignment with other biodiversity-related multilateral agreements, processes and instruments. Food security, access to safe drinking water and resilience to natural disasters cannot be delivered by this Convention alone: it will need a serious collaborative and coordinated action from multiple stakeholders across numerous sectors and processes to address the inseparable challenges of biodiversity loss, climate change, land degradation and unsustainable development that are caused by the same drivers and interdependent dynamics. We suggest connecting this goal and its milestones with the guiding directions of the Nationally Determined Contributions (NDCs, under UNFCCC) and Land Degradation Neutrality (LDN, under UNCCD) in order to ensure alignment and facilitate the delivery of the GBF mission; setting measurable targets for nature-based solutions and ecosystems based-approaches to climate change and desertification. Avaaz also encourages connecting this goal with other strategic frameworks, such as CITES, UNCL, CMS, Ramsar, Sendai, UNFF, ITPGR and others. In particular, Avaaz is concerned that the climate dimension is no longer part of the goal. In order to keep the planet under 1.5C, the CBD should play an integral role to support the mandate of the UNFCCC. At the same time, science is clear that the success to advance the mandate of the CBD will largely depend on keeping the planet under 1.5C, hence both conventions should play clear, distinct yet complementary roles to advance their specific mandates.</p>
<p>Goal C. The benefits, from utilization of genetic resources are shared fairly and equitably.</p> <p>2030 Milestones</p> <p>(i) Access and benefit sharing mechanisms are established in all countries</p> <p>(ii) Benefits shared increased by [x%]</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>We suggest the following language on Goal C: The benefits, from utilization of genetic resources are shared fairly and equitably by all parties, stakeholders and rights-holders.</p>	<p>A general comment on Goal C: Avaaz notes with deep concern that the term "traditional knowledge" is no longer at the goal level, which contradicts the latest scientific recommendations from the 2019 IPBES global assessment: "Recognizing the knowledge, innovations, practices, institutions and values of indigenous peoples and local communities, and ensuring their inclusion and participation in environmental governance, often enhances their quality of life and the conservation, restoration and sustainable use of nature, which is relevant to broader society." For this reason, the post-2020 biodiversity framework should have a clear and implementable goal and targets to support community conservation, including policy measures that recognize the role, rights, traditional knowledge, collective actions and customary sustainable use practices of groups like women and Indigenous Peoples in mainstreaming biodiversity conservation. Avaaz is well aware that this goal is aimed at the third objective of the CBD, but wishes to make a point that there are no binding considerations for the equitable share of benefits arising from the sustainable use of the other components of biodiversity: ecosystems and natural resources. The GBF should at least set a goal in starting such a process.</p>

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<p>Goal D. Means of implementation is available to achieve all goals and targets (of) the Framework</p> <p>2030 Milestones</p> <p>(i) By 2022, means to implement the Framework for the period 2020 to 2030 are identified or committed</p> <p>(ii) By 2030, means to implement the Framework for the period 2030 to 2040 are identified or committed</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>We suggest the following language for Goal D: Means of implementation is available to achieve all goals and targets (of) the framework</p> <p>i) By 2022, all means to implement the framework for the period 2020 to 2030 are fully identified or committed.</p> <p>ii) By 2025, all financial means to implement the framework are fully identified or committed.</p> <p>iii) By 2030, all means to implement the framework for the period 2030 to 2040 are fully identified or committed.</p>	<p>A general comment on Goal D: This goal needs stronger language to ensure means of implementation are fully in place by 2022. This goal is very relevant to targets 17 and 18, and some indicators outlined there could be useful to have as reference or proxy indicators for this goal.</p> <p>We suggest adding the following indicator:</p> <p>- International funding from different sources, including the IMF, for implementation of the Global Biodiversity Framework.</p>
<p>N/A</p>	<p>We suggest an additional goal, with the following language: By 2030, traditional knowledge, innovations and practices of Indigenous Peoples and local communities relevant for the conservation and sustainable use of biodiversity, and their customary use of biological resources, are fully integrated and reflected in the implementation of the GBF, taking into account and respecting the role of indigenous peoples and local communities as traditional stewards of their lands, resources, knowledge and livelihoods, at all relevant levels.</p>	<p>In order to improve the set of indicators and elements for this monitoring framework, parties should consider an addition of a specific goal related to traditional knowledge, Avaaz suggests including an specific goal on this area. Elevating traditional knowledge into a goal level would play a significant transformational role in the whole framework and will bring new perspective in the global policy fora.</p>

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<p>Target 1. By 2030, [50%] of land and sea areas globally are under spatial planning addressing land/sea use change, retaining most of the existing intact and wilderness areas, and allow to restore [X%] of degraded freshwater, marine and terrestrial natural ecosystems and connectivity among them</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>For target 1, we suggest the following language: “By 2030, [50100%] of land and sea areas globally, including Key Biodiversity Areas, connectivity zones and other sites of biodiversity importance, are under spatial and sound, rights-based and equitable community governance planning that addresses land/sea use change, retaining most of the existing intact and wilderness areas, and allow to restore in extent and integrity of [X%] at least 50% of degraded freshwater, marine and terrestrial natural ecosystems and connectivity among them, while halting and reversing the decline of critical and vulnerable ecosystems and habitats, delivering a net increase in area.</p>	<p>A general comment on Target 1: We note with concern that the articulation of this target is weaker than the language at the zero draft. Avaaz believes that, in order to fulfill the mission of the 2030 Agenda and the GBF, 100% of the planet should be under inclusive and comprehensive spatial planning in which biodiversity is considered as a strategic infrastructure for food, water and health security of all our societies. By only aiming 50% of spatial planning, we’d risk leaving behind unaddressed key biodiversity areas and ecologically or biologically significant areas that will be crucial to deliver the 2050 goals. Furthermore, this target needs specificity on what needs to be under such planning: sub-targets on (i) restoration, (ii) curbing unsustainable agriculture, forestry, fisheries, tourism, and production and consumption patterns of other productive sectors and (iii) addressing urban and other impacts related to cities would help parties to discuss with precision the target as well as its elements, components and indicators. Avaaz believes that a comprehensive and proper spatial planning should fully take into account the identification of Key Biodiversity Areas (KBAs), which will ensure specificity and alignment between Parties in implementation. Given that the KBA standard does not cover connectivity zones, and that there is a separate standard for identifying such areas, reference to both KBAs and connectivity zones is important (see more information in Post-2020 Framework: A Transformational Approach Avaaz’s response to the zero draft of the post-2020 global biodiversity framework, pages 17 and 18).</p>
<p>Target 2. By 2030, protect and conserve through well connected and effective system of protected areas and other effective area-based conservation measures at least 30% of the planet with the focus on areas particularly important for biodiversity</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>For target 2, we suggest the following language: By 2030, protect and conserve through a well connected and effective system of equitably governed and effectively managed protected areas, ICCAs and OECMs at least 30% 50% of the planet with the focus on areas particularly important for biodiversity all land, freshwater and marine ecosystems.</p>	<p>A general comment on Target 2: Avaaz expresses concerns over the articulation of this target based on science and human rights grounds.</p> <p>(a) <i>Observations on science grounds:</i> It is important to clearly parse out the difference between total area targets and subset area targets: The Global Safety Net 1.0 shows that an overlay analysis of the 10 leading global-scale conservation priority regimes (including existing PAs) yielded a result of 29.9% of total land area as being “of particular importance for biodiversity.” Parallel analyses of marine areas have yielded a similar figure of 30%. An additional 20% of total land area has been identified as “of particular importance for ecosystem services,” namely carbon storage, as well as providing potential habitat for species migrating as a result of climate change. Not protecting these land areas could lead to further deforestation and land conversion that would likely result in an inability to stay below the dangerous threshold of 1.5C in global average temperature rise, at which point many biodiversity outcomes would become difficult, if not impossible, to achieve.</p> <p>Last year, a survey of over 335 conservation scientists from 81 countries done by the IUCN World Commission on Protected Areas’ Beyond the Aichi Targets Task Force reported “very strong support for large-scale percentage area conservation targets, in the order of 50 percent of the Earth.” And just a couple of months ago, a group of IUCN experts published another review of the literature, in which the call for 50% of the Earth is a midpoint of these values and is supported by a range of studies. Also last year the Global Deal for Nature (GDN) was launched. The GDN is a time-bound, science-driven plan to save the diversity and abundance of life on Earth, advising a set target of 30% of</p>

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<p>Target 2. By 2030, protect and conserve through well connected and effective system of protected areas and other effective area-based conservation measures at least 30% of the planet with the focus on areas particularly important for biodiversity</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>For target 2, we suggest the following language: By 2030, protect and conserve through a well connected and effective system of equitably governed and effectively managed protected areas, ICCAs and OECMs at least 30% 50% of the planet with the focus on areas particularly important for biodiversity all land, freshwater and marine ecosystems.</p>	<p>the Earth to be formally protected and an additional 20% designated as climate stabilization areas, totaling 50% of preserved areas by 2030, to stay below 1.5°C. That plan has been supported by hundreds of indigenous federations and grassroots organizations across Africa, Latin America, and Asia. Additionally, <i>In Bolder Thinking for Conservation</i>, scientists indicate that, from a precautionary perspective, 50% —slightly above the mid-point of recent evidence-based estimates (Fig. 1)—is scientifically defensible as a global target.</p> <p>(b) Concerns over human rights: as pointed out by several indigenous rights organizations throughout this process, the current presentation of the GBF targets contain no effective safeguards to protect the lands, rights and livelihoods of indigenous and other land-dependent communities in conservation programmes, which could violate UN norms and international law. Furthermore, the proposal fails to reflect the findings of the IPBES 2019 Global Assessment that existing protected areas are “not yet effectively or equitably managed” or the emphasis it placed on the need to protect indigenous lands. Therefore, the current language of targets needs to be seriously reviewed.</p> <p>As some of our partners pointed out, the 30% target is being set without a prior assessment of the social impacts and conservation effectiveness of the previous drive for 17% terrestrial protected areas (adopted by the Parties to the CBD in 2010). Protected areas have led to displacement and eviction of indigenous peoples and other land-dependent communities, and brought serious human rights abuses by conservation organisations and enforcement agencies. Despite provisions in the current CBD framework and draft post-2020 GBF to include ‘Other Effective Area-Based Conservation Measures’ in global conservation targets, experience has shown that state-owned, strict protected areas have often remained the default choice in much of the Global South. The GBF should be explicit in ensuring, in any part of its language articulation, that its implementation will be taking into account existing guidance on governance and equity (including the COP 14 decision on protected areas and OECMS).</p> <p>Lastly, Avaaz is concerned about the lack of any reference to equitable governance in this target, which could open the door for violation of traditional, customary, indigenous and community rights, while contributing nothing to, or undermining, biodiversity outcomes. Recalling the Thematic Workshop on Area-Based Conservation Measures for the Post-2020 Global Biodiversity Framework, last December, and the lack of clarity on whether “protection” will include “free of human presence”, Avaaz considers that this ambiguity should be addressed. As many of our partners rightly pointed out, human rights and land rights safeguards are essential to any protection target, if this Framework is to have a rights-based approach as noted in preambular text. Also, as reflected in a joint submission at that workshop, signed by Avaaz, CBD Alliance, Forests Peoples Programme, Friends of the Earth International, Global Youth Biodiversity Network and ICCA Consortium, “the 30 x 30 global area target alone is not sufficient to preserve biodiversity. The conservation community should be very careful in pushing for spatial targets without fully engaging with IPLCs.”</p>

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<p>Target 2. By 2030, protect and conserve through well connected and effective system of protected areas and other effective area-based conservation measures at least 30% of the planet with the focus on areas particularly important for biodiversity</p> <p>(CBD/SBSTTA/24/3 Page 7)</p>	<p>For target 2, we suggest the following language: By 2030, protect and conserve through a well connected and effective system of equitably governed and effectively managed protected areas, ICCAs and OECMs at least 30% 50% of the planet with the focus on areas particularly important for biodiversity all land, freshwater and marine ecosystems.</p>	<p>a. “Protection”: In some cases, establishing protected areas has the effect of removing existing effective protections (as in the case of indigenous peoples traditional territories) and instituting instead government-led areas open to corruption and encroachment. This action therefore risks promoting violation of traditional, customary, indigenous and community rights, while contributing nothing to, or undermining, biodiversity outcomes. The notion of applying ‘protection’ remains undefined and it is open to promoting the violation of rights, if ‘protection’ is equated to ‘completely free of human presence’ under national legislation or de facto measures taken in national jurisdictions. Human rights and land rights safeguards are essential to any protection’ target, if this framework is to have a ‘rights-based’ approach as noted in preambular text. Therefore, the very same target needs to include a reference to equitable governance and management of protected areas, in line with its policy predecessor Aichi target 11.</p> <p>b. “Effective protection”: the international community still has challenges in adequately accounting for ‘effective’ protection, where the protected area estate is not proven to be (or in places intended to be) effective at biodiversity protection. Furthermore, the increase in the number and scope of conventional protected areas, largely under direct government control, appears as achievement of this target, with little recognition that the gazetting of further protected areas may infringe on existing property rights, and may not contribute to actual effective protection.</p>
<p>Target 3. By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%]</p> <p>(CBD/SBSTTA/24/3 Page 8)</p>	<p>For target 3, we suggest the following language: By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%], while respecting rights to customary sustainable use.</p>	<p>A general comment on Target 3: A target focused on species is a positive step; we encourage parties to recognize in this target the respect of the rights of IPLCs to collect and use wild species, and acknowledge the benefits of their uses, such as nutrition, livelihoods and the deep interrelation between the wellbeing, culture and food security of the IPLCs and their landscapes and seascapes. Avaaz encourages the use of proxy indicators (regional level) in the reduction of human-wildlife conflict in lieu of the absence of global indicators.</p>
<p>Target 4. By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora, is legal, at sustainable levels and safe.</p> <p>(CBD/SBSTTA/24/3 Page 8)</p>	<p>For target 4, we suggest the following language: By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora is legal, at sustainable level and safe, while protecting and encouraging indigenous and local communities’ customary sustainable practices in relation to biodiversity.</p>	<p>A general comment on Target 4: while Avaaz welcomes this goal, it also notes that this framework needs more concrete indicators on sustainability in order to make it effective in its implementation phase. Furthermore, this monitoring framework will eventually need indicators related to enhanced participatory management and use, involving Indigenous Peoples and local communities, youth and women in order to ensure consistency with the SDGs. The word ‘safe’ in this target is misplaced and unclear, and can lead into different interpretations as to what is “safe”, and “safe” from whom or what. Also: Article 10(c) of the CBD states that Parties shall protect and encourage indigenous and local communities’ customary sustainable practices in relation to biodiversity. The GBF should consider Article 10 (c) provisions as a cross-cutting issue into its Goals and Targets, including and foremost regarding sustainable use of biodiversity.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 5. By 2030, manage, and where possible control, pathways for the introduction of invasive alien species, achieving [50%] reduction in the rate of new introductions, and control or eradicate invasive alien species to eliminate or reduce their impacts, including in at least [50%] of priority sites.</p> <p>(CBD/SBSTTA/24/3 Page 8)</p>	<p>For target 5, we suggest the following language: By 2030, manage, and where possible control; pathways for the introduction of IAS, achieving 50% reduction in the rate of new introductions, and eradicate, control and manage IAS to eliminate or reduce their impacts, including in at least 50% of priority biodiversity sites.</p>	<p>A General comment on Target 5: While Avaaz welcomes the inclusion of a target on invasive alien species (IAS), it notes with concern that this specific target uses the language “where possible”, which makes this target weak. Given the nature of this target, Avaaz encourages the use of proxy indicators (regional level) in the reduction of human-wildlife conflict in lieu of the absence of global indicators.</p>
<p>Target 6. By 2030, reduce pollution from all sources, including reducing excess nutrients [by x%], biocides [by x%], plastic waste [by x%] to levels that are not harmful to biodiversity and ecosystem functions and human health</p> <p>(CBD/SBSTTA/24/3 Page 8)</p>	<p>For target 6, we suggest the following language: By 2030, significantly reduce pollution from all sources, including reducing excess nutrients [by x%], biocides [by x%], and plastic waste by x%50% to levels that are not harmful to biodiversity and ecosystem functions and human health, from 2020 baselines, prioritizing pollutants that have an impact on vulnerable groups, such as women, children, and indigenous peoples and local communities.</p>	<p>A General comment on Target 6: the current articulation of this target is less ambitious than its predecessor; therefore Avaaz suggests to put back the target of 50% reduction for 2030, taking a baseline from 2020. Plastic pollution is a serious threat to our biodiversity and an ambitious target should be set as a matter of urgency. New research suggests the scale of plastic pollution in our oceans could be a million times worse than previously recorded and the UN has called businesses and governments to take ambitious action and move beyond recycling and the elimination of the most problematic packaging. Avaaz suggests in the monitoring elements to clearly split each trend into two categories, land and sea, because the nature and dynamics of pollution are quite different and cannot be encapsulated in one monitoring element (e.g. trends in levels of pollution from noise, hazardous waste, sediments, biocides, etc). Additional indicators should be created through a government-led cross-sectorial transparency mechanism in order to measure progress in the reduction of nutrient pollution, sediment, plastic and chemical pollution of the ocean by industry, agriculture, waste management and sewage, as well as marine noise pollution. Furthermore, parties should consider a globally standardized monitoring element and indicators for the reduction of material waste generated (based on measures from “zero waste” programs), reduction of sales of disposable materials and a rapid uptake of recycling; including metals, minerals and non-metals. Last but not least, reduction policies should prioritize those pollutants that affect vulnerable groups.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 7. By 2030, increase contributions to climate change mitigation (adaptation) and disaster risk reduction from nature-based solutions and ecosystems based (approaches), ensuring resilience and minimising any negative impacts on biodiversity</p> <p>(CBD/SBSTTA/24/3 Page 8/9)</p>	<p>For target 7, we suggest the following language: By 2030, increase contributions to climate change mitigation, adaptation and disaster risk reduction from culture nature-based solutions and ecosystem-based approaches, ensuring resilience and minimising averting any negative impacts on biodiversity, by providing approximately 6.5GtCO2 per year of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity, food sovereignty and IPLCs rights, as well as an increase in the securely titled and appropriately supported Indigenous and/or community managed and owned territories, especially in areas of particular importance for ecosystem services, including carbon storage, water provisioning, sustainable livelihoods and climate resilience.</p>	<p>A general comment on Target 7: Avaaz is deeply concerned about the ambiguity and lack of ambition of this target. While it's a good step to keep at target level climate change mitigation, adaptation and disaster risk reduction, the lack of precision makes this target meaningless. Avaaz also notes that there's no longer mention of the Paris agreement. Achieving the Paris Climate Agreement Goals (Teske et al, 2019) demonstrates the 30% reduction target outlined in the Draft Zero is the right one and should be put back in order to add key indicators through ecosystems-based approaches and nature based solutions: 2.5GtCO2/yr negative emissions is possible in 2030 with another 4GtCO2 in avoided land use, land-use change, and forestry (LULUCF) emissions (or 6.5GtCO2 which is about 34% of the the 19GtCO2 reduction needed by 2030). By 2050 we can be doing 7.3 GtCO2/yr + 4GtCO2 and we need a total reduction of 38GtCO2 (around 30%).</p> <p>The Global Safety Net (GSN) helps us to see the linkages between the Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD). If we surpass 1.5°C in global average temperature rise, it will be difficult if not impossible to achieve the goals of the CBD. And if we fail to protect or conserve lands for ecosystem services and carbon sequestration, we will not be able to achieve the Paris Climate Agreement. There is a very finite amount of natural land (1.5% of global land area) that could be converted to human uses before we lose the 1.5°C window. Therefore, we need to protect all remaining natural lands by 2030 – approximately 50% of the Earth – in order to save biodiversity and stabilize our global climate system.</p> <p>As many grassroots partner organizations pointed out, including secured tenure as a specific action target appropriately recognises the solutions and positive contributions of Indigenous Peoples and local communities, instead of relegating them to participation and safeguards. There's also a need for recognition that an increase in the securely titled and appropriately supported Indigenous and/or community managed and owned territories would directly contribute to the desired outcomes of both the UNFCCC and the CBD, in particular by safeguarding carbon sinks. It's important to remind the Parties that IPLCs manage at least 22% (218 gigatons) of the total carbon found in tropical and subtropical forests (including both above- and belowground sources) and that at least a third of this carbon —and likely much more— is in areas where IPLCs lack formal recognition of their land rights. Failure to legally recognize their rights leaves our forests vulnerable to environmentally destructive projects that devastate forests and release massive amounts of carbon into the atmosphere. Legally recognizing their land rights and supporting their initiatives is vital to the success of global efforts to mitigate climate change and the loss of biodiversity.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 8. By 2030, ensure benefits, including nutrition, food security, livelihoods, health and wellbeing, for people, especially for the most vulnerable through sustainable management of wild species of fauna and flora.</p> <p>(CBD/SBSTTA/24/3 Page 9)</p>	<p>For target 8, we suggest the following language: By 2030, ensure benefits, including nutrition, food security, livelihoods, health and wellbeing, for people, especially for the most vulnerable through culturally and socially sustainable management of wild species of fauna and flora, including customary and traditional sustainable use by IPLCs.</p>	<p>A general comment on Target 8: Avaaz is concerned about the lack of language on equity and as well the lack of focus on this target. Avaaz suggests for the indicators for this target a greater focus on the benefits for people and put elements of equity in order to allow this target to have consistent and meaningful indicators to track progress. This target, outlined under the umbrella “Meeting People’s Needs Through Sustainable Use and Benefit-sharing”, does not include any actions related to meeting the needs of Indigneous Peoples and local communities to the resources that they depend on, and manage. This appears as an absence in the text ‘People’s needs’ are defined exclusive to the needs of local communities and Indigenous Peoples. And the question remains on how and who receives the benefits.</p>
<p>Target 9. By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%].</p> <p>(CBD/SBSTTA/24/3 Page 9)</p>	<p>For target 9, we suggest the following language: By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation, the contributions of IPLCs to agroecology and food sovereignty and other sustainable use of such ecosystems, reducing productivity gaps by at least 50%.</p>	<p>A general comment on Target 9: Avaaz welcomes this target, and suggests to add an explicit inclusion of the IPLCs contribution in this target. We’re already producing more than enough food to feed 10 billion people, but roughly 1/2 of the world’s agricultural land is currently used to grow livestock feed and fuel crops. In addition, roughly 30% of produce yields are wasted. So we’re only able to feed 7 billion people, leaving 1/10th of the population in hunger. If half of the areas used for food and fuel were put into food production instead, we could feed another 2.5 billion people. Sustainable soil use, along with complementary measures such as cutting food waste by half, will be critical for the success of the GBF and the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity. The target of reducing productivity gaps by at least 50% can only be achieved with the leadership of Indigenous Peoples, local communities and small farmers. For more guidance and information, Avaaz encourages parties to read our review comments on the SBSTTA-24 Updated Plan of Action 2020-2030 for the International Initiative for the Conservation and Sustainable Use of Soil Biodiversity.</p>
<p>Target 10. By 2030, ensure that nature based solutions and ecosystem approach contribute to regulation of air quality, hazards and extreme events and quality and quantity of water for at least [XXX million] people.</p> <p>(CBD/SBSTTA/24/3 Page 9)</p>	<p>For target 10, we suggest the following language: By 2030, ensure that nature based solutions and ecosystem approach contribute to natural regulation of air quality, hazards and human-induced extreme events and the universal and equitable access to water, including safe and affordable water for all, in quality and quantity of water for at least [XXX million] people.</p>	<p>A general comment on target 10: Most disasters are human induced, which this goal should reflect. Furthermore, Avaaz proposes to add the word “natural” to the text to ensure that the focus is more clearly on enhancing nature’s ability to provide air quality and water in quality and quantity. And on water access Avaaz suggests to follow language of the SDG 6.1.</p> <p>Additional comment: Recommendation SBSTTA 23/2 notes that nature-based solutions with biodiversity safeguards are an essential component of ecosystem-based approaches to climate change adaptation, mitigation and disaster risk reduction. As mentioned before, the Global Safety Net (GSN) helps us to see the linkages between the Framework Convention on Climate Change (UNFCCC) and the Convention on Biological Diversity (CBD). If we surpass 1.5°C in global average temperature rise, it will be difficult if not impossible to achieve the goals of the CBD. And if we fail to protect or conserve lands for ecosystem services and carbon sequestration, we will not be able to achieve the Paris Climate Agreement. There is a very finite amount of natural land (1.5% of global land area) that could be converted to human uses before we lose the 1.5°C window. Therefore, we need to preserve all remaining natural lands by 2030 – approximately 50% of the Earth – in order to save biodiversity and stabilize our global climate system.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 11. By 2030, increase benefits from biodiversity and green/blue spaces for human health and well-being, including the proportion of people with access to such spaces by at least [100%], especially for urban dwellers</p> <p>(CBD/SBSTTA/24/3 Page 9)</p>	<p>For target 11, we suggest the following language: By 2030, increase benefits from biodiversity and green/blue spaces for human health and well-being, including the proportion of people with full and free access to such spaces by at least [100%], especially for urban dwellers, while ensuring the respect of local cultures and impact control in recreational and other uses.</p>	<p>A general comment on Target 11: Avaaz welcomes this target and suggests taking into account specific cultural considerations, so local cultures are respected and prioritized over the access of which urban dwellers in certain spaces. This target can be largely aligned with SDG 11. However, we also caution that “well being” and “human health” are multidimensional concepts that require a multidisciplinary process to define, design, develop, articulate and measure indicators for “well being” in the context of biodiversity.</p>
<p>Target 12. By 2030, increase by [X] benefits shared for the conservation and sustainable use of biodiversity through ensuring access to and the fair and equitable sharing of benefits arising from utilization of genetic resources and associated traditional knowledge</p> <p>(CBD/SBSTTA/24/3 Page 9)</p>	<p>For target 12, we suggest the following language: By 2030, increase by [X] benefits shared for the conservation and sustainable use of biodiversity through ensuring access to and fair and equitable sharing of benefits arising from utilization of genetic and biological resources in any form, ecosystem services and associated traditional knowledge, based on the free, prior and informed consent (FPIC) of rights-holders and knowledge-holders, and considering synergies with other global instruments on benefit sharing.</p>	<p>A general comment on Target 12: Avaaz believes knowledge and right holders should be mentioned in this target. We recommend that this ‘benefit-sharing’ goal is widened to include the sharing of benefits from the conservation of biodiversity, use of ecosystem services and other activities, building from the spirit of the Nagoya Protocol on Access and Benefit Sharing to the CBD,</p>
<p>Target 13. By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into assessments of environmental impacts</p> <p>(CBD/SBSTTA/24/3 Page 10)</p>	<p>For target 13, we suggest the following language: By 2030, integrate biodiversity and cultural values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into inclusive and participatory assessments of cultural, environmental and social impacts.</p>	<p>A general comment on Target 13: Avaaz believes that a wide and truly inclusive participatory process is the fundamental basis for any mainstreaming effort, hence our wording proposal in that regard. Inclusive participation is key. This framework should be a strong cultural change factor among policy makers, so language is critical to start that process with all sectors, especially in areas of the governments that are less familiar with the GBF and biodiversity-related instruments and mechanisms.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 14. By 2030, achieve reduction of at least [50%] in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable</p> <p>(CBD/SBSTTA/24/3 Page 10)</p>	<p>For target 14, we suggest the following language: By 2030, achieve [50%] 100% reduction in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable, through, especially, regulatory approaches and effective enforcement, both nationally and at transnational level.</p>	<p>A general comment on Target 14: with the current technology available, and the fast technology advances in the near future, it's possible to reduce to zero the negative impacts on biodiversity in production practices and supply chains. Parties have identified the need to address the fact that distant areas of the world are increasingly connected by trade and global supply chains, resulting in biodiversity loss in other areas. Setting up a specific target on trade related impacts is important in this context.</p>
<p>Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic condition</p> <p>(CBD/SBSTTA/24/3 Page 11)</p>	<p>For target 16, we suggest the following language: By 2030, eliminate unsustainable consumption patterns by 50%, ensuring through public and private approaches that people everywhere understand and appreciate the value of biodiversity, make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions.</p>	<p>A general comment on Target 15: Consumption patterns are largely influenced and shaped by the action or inaction of government/official measures to control the market, and therefore we consider that the target should mention that. As it is written, it pushes the weight of responsibility and burden only to consumers, without reflecting that they only can take “responsible choices” if they have them. To that end, the burden of the leadership should rely on governments to guide productive sectors and other consumers to change behaviour patterns towards a positive outcome for biodiversity. Last but not least, education access will play a big role in delivering this target, so Avaaz strongly encourages finding additional synergies between this target and the SDG 4. Avaaz also emphasizes that successful experiences in transforming citizen behaviour involves direct and indirect incentives and also strong, well-designed public campaigns to guide consumption behaviour patterns. This target can only be achieved through a concerted coordinated action between the private and public sectors towards a transformative education on biological and cultural diversity, languages, sustainability and heritage that is promoted and integrated into school curricula at all levels, including informal education, with a strong focus on reconnection with nature through learning-by-doing and experiencing nature.</p>
<p>Target 16. By 2030, establish and implement measures to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health reducing these impacts by [X].</p> <p>(CBD/SBSTTA/24/3 Page 11)</p>	<p>For target 16, we suggest the following language: By 2030, establish and implement measures to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health. Reduce 100% of these impacts by in a transparent manner, considering the precautionary principle and taking into account risks to human health and socio-economic considerations, especially with regard to the values of biological diversity to IPLCs.</p>	<p>A general comment on Target 16: More transparency and accountability is needed in the articulation of this target, and given the profound impact of biotechnology in biodiversity and in our societies, measures should be widely consulted among different actors across the biodiversity policy discussion. Since the Cartagena Protocol on Biosafety entered into force in 2003, the level of transparency and accountability from governments over biotechnology incidents were suboptimal to say the least. This needs to change in the name of environmental security and public health, and civil society, IPLCs and other actors should have greater access in participating in the discussion of biodiversity measures at national level.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity</p> <p>(CBD/SBSTTA/24/3 Page 11)</p>	<p>For target 17, we suggest the following language: By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] 100% reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.</p>	<p>A general comment on Target 17: This target should emphasize that all perverse incentives that might cause biodiversity destruction and loss should be redirected to activities that are protective of biodiversity or eliminated, and this action should be presented as a target in itself, aiming for a 100% redirection and phasing out of perverse incentives by 2030, with a mid-term divestment target of 50% of public and private investments and incentives, including harmful subsidies for biodiversity. This should also include sub-targets to identify all perverse incentives (including subsidies on livestock and aquaculture production), and setting up a clear timeline with verifiable sub-targets to ensure implementation, contributing significantly to resource mobilization, oriented to systemic changes towards living in harmony with the whole planet. This is doable and an increasing number of State and non-State actors are calling for this direction. Avaaz is suggesting very specific edits in order to add the ambition and the transformational spirit that is currently lacking. A big part of the success of the GBF and the Agenda 2030 will depend on this. And it's possible, since more governments, researchers, and NGOs are increasingly recognizing subsidies as a major barrier to the transformation of our economies. Aichi Target 3 (AT3) was clear that subsidies and incentives that are harmful to biodiversity should be phased out or reformed by 2020. This didn't happen, but the international community has an opportunity in the current context to right that wrong. A strong target of eliminating harmful subsidies within the CBD post 2020 framework will accelerate the implementation of other SDGs, and it will free substantial financial resources to be used to support the implementation of the post-2020 targets and the already agreed SDGs targets (in particular, SDG2, SDG8, SDG10, SDG12 and SDG13). Public investments in biodiversity conservation and restoration, both nationally and internationally, make little sense if they are outpaced by public investments in biodiversity destruction. A strong target on tackling perverse subsidies will be hugely beneficial for the goals of all Rio conventions. For instance, unsustainable livestock production is responsible for an estimated 14% of global greenhouse gas emissions, and addressing unsustainable livestock production and consumption is not just a matter of behavioural change, but is contingent on a redirection of perverse incentives and other regulatory and economic tools.</p>
<p>Target 18. By 2030, increase by [X%] financial resources from all international and domestic sources, through new, additional and effective financial resources commensurate with the ambition of the goals and targets of the Framework and implement the strategy for capacity-building and technology transfer and scientific cooperation to meet the needs for implementing the post2020 global biodiversity framework.</p> <p>(CBD/SBSTTA/24/3 Page 11/12)</p>	<p>For target 18, we suggest the following language: By 2030, increase by [X%] 50% financial resources from all international and domestic sources, through new, additional and effective financial resources commensurate with the ambition of the goals and targets of the Framework and implement the strategy for capacity-building and technology transfer and scientific cooperation to meet the needs for implementing the post 2020 global biodiversity framework.</p>	<p>A general comment on Target 18: Avaaz believes that it's imperative to step up in the ambition on this target. The 2015 multilateral milestone (Addis Ababa Action Agenda, UNSDGs & the Paris Agreement) set a new ground for environmentally sustainable economic development, we need a progress indicator in line with this new global paradigm.</p>

LANGUAGE	LANGUAGE SUGGESTION	COMMENTS
<p>Target 19. By 2030, ensure that quality information, including traditional knowledge, is available to decision makers and public for the effective management of biodiversity through promoting awareness, education and research</p> <p>(CBD/SBSTTA/24/3 Page 12)</p>	<p>For target 19, we suggest the following language: By 2030, ensure that quality information, including traditional indigenous and local knowledge, is available to decision makers and to the public, based on best available knowledge for the effective, adaptive, evidence based and ecosystem based management of biodiversity through promoting awareness, education and research with free, prior and informed consent.</p>	<p>A general comment on Target 19: Avaaz is concerned that protections for IPLCs, specifically the free, prior and informed consent (FPIC) dimension are absent from this iteration. We believe that FPIC should be put back in the drafting process. Recommendations from IPBES Global Assessment report 2019 also outlines the importance of local knowledge, and as such the term “local” should be included.</p>
<p>Target 20. By 2030, ensure equitable participation in decision-making related to biodiversity and ensure rights over relevant resources of indigenous peoples and local communities, women and girls as well as youth, in accordance with national circumstances</p> <p>(CBD/SBSTTA/24/3 Page 12)</p>	<p>For target 20, we suggest the following language: By 2030, ensure equitable participation in decision-making related to biodiversity and ensure rights over relevant resources of indigenous peoples and local communities, women and girls as well as youth, in accordance with national circumstances and, regarding IPLCs, subject to their prior informed consent.</p>	<p>A general comment on Target 20: Avaaz welcomes this target, although offers a caution that its inclusion as the last one in the document (and its inconsistent articulation of components, monitoring elements, indicators and baselines) could be read and understood like IPLCs are not essential actors of this framework. We suggest deleting the reference “in accordance with national circumstances” since this is a global framework and parties already have recognized their international obligations on indigenous rights (ILO, UNDRIP) and human rights, through several treaties, conventions and instruments, including the article 8(j) of this Convention and its Mo’otz kuxtal voluntary guidelines.</p>

General comments

01. We note in the monitoring framework a bias toward a “monoculture” mindset that heavily relies in Western knowledge on natural sciences. Avaaz calls for a more diverse set of components, monitoring elements and indicators that can provide a holistic, balanced and full picture of the state of the world and in particular the actions that should be taken to revert the loss of biodiversity. Across the monitoring framework it became clear that components, monitoring elements, indicators and baselines, from ontological and epistemological perspectives, are heavily focused on natural sciences and quantitative measures. The framework should therefore find the right balance between western-based exact sciences and multiple types of knowledge and evidence, including social sciences and indigenous and local knowledge systems. The Sharm El-Sheikh Declaration on Nature and Culture (CBD/COP/14/INF/46), in its operational paragraph 10, call on Parties to “promote and further develop culturally-relevant and community-based monitoring and reporting indicators which can provide strong evidence, lead to better tracking, and enable meaningful action on the ground to address local issues and key threats” and in its operational paragraph 7, it states: “Promote a sustained dialogue between science and indigenous and local knowledge systems to provide a foundation for a new paradigm, generating the best possible knowledge and solutions for biological and cultural resilience”. This monitoring framework falls short in this regard.

02. We still note a disparity in goals and targets (and in their respective components, elements, indicators and baselines), with

particular emphasis on conservation in detriment with the objectives on sustainable use and benefit sharing: Avaaz calls on SBSTTA to ensure a robust balance in the monitoring framework that reflects appropriately the three objectives of the convention.

Currently, Goal A (on conservation) has more than 50 complementary indicators, while Goal B (with more emphasis on sustainable use) has over 20 complementary indicators, while Goal C (on benefit sharing) only has 4 complementary indicators. Avaaz believes that the monitoring framework should reflect with more precision a technical and scientific balance that allows a holistic and complete overview in the progress of all the objectives of the CBD convention and not only conservation (*Article 1. Objectives: The objectives of this Convention, to be pursued in accordance with its relevant provisions, are the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources, including by appropriate access to genetic resources and by appropriate transfer of relevant technologies, taking into account all rights over those resources and to technologies, and by appropriate funding.*).

03. We note that the proposed monitoring framework still largely ignores the key role of indigenous peoples and local communities (IPLCs) in safeguarding biodiversity: given their central role in delivering positive biodiversity outcomes, Avaaz calls on SBSTTA to consider the inclusion of IPLCs across all goals and targets.

Science is now clear that IPLCs are the most effective and efficient custodians of our biodiversity, and that’s why we note with concern that the relationship of IPLCs with ecosystem conservation,

General comments

integrity and connectivity is not considered in this framework. In situ conservation practices, especially regarding agriculture, including traditional agricultural practices, should be considered when biodiversity conservation and sustainable use and utilization is mentioned throughout this document. Furthermore, Avaaz believes that more work needs to be done in the headline indicators and components of the target 20: mentioning only “relevant” resources in Target 20, with regards to IPLCs, seriously limits their role as guardians and first respondents in ecosystem conservation, integrity and connectivity, as well as in situ biodiversity conservation, including natural and genetic resources important for food and agriculture. Within the boundaries of the current proposed indicators and monitoring approach for the GBF, Avaaz suggests that special emphasis should be put on “other area-based conservation measures” to ensure that ICCAs/ IPLCs lands are included. That’s why we suggest the addition of a fifth goal focused on traditional knowledge, which would improve the output of the whole GBF.

04. We note, more broadly, that the monitoring framework is not properly reflecting the role of people in preserving biodiversity. People in both cities and rural areas will play a key role, because what we need is to stop the sixth extinction. We need to learn to live without overconsumption, which increases global biodiversity loss, and to not transfer biodiversity loss from certain areas to others in the name of conservation or “sustainable practices”. Crucially, the cross-cutting view of sustainability is not considered, in general, and environmental topics are isolated from cultural, economic and

social considerations. Looking at it in its entirety, we note in this framework an absence of monitoring elements and indicators related to in situ conservation, which plays a critical role in fulfilling the goals and targets that this process will define in due course. Furthermore, we note a deficit in addressing the mainstreaming of biodiversity into sectors as decided by the CBD COP in its two past meetings at Cancun (Mexico) and Sharm El-Sheikh (Egypt). In today’s complex landscape the needs and demands of communities and people go far beyond their frontiers, which means the world needs a strong biodiversity framework, one that truly connects the policy elites and those in the peripheries. We need to rise, we need a results-driven GBF which meets the world’s expectations, in an era where many are feeling trapped in the middle of a collective stagnation and failure.

05. While we appreciate the effort to integrate the GBF within the Agenda 2030, we believe that some indicators under SDG15 should be reviewed for the purpose of this framework and in light of new international/post-Covid-19 context: we believe that some SDG 15 targets should be reviewed for the purpose of this framework, and indicators for topics related to SDG 15 should be used in relation to IPLCs, traditional knowledge associated with agriculture and forestry, sustainable forest management, traditional agriculture (e.g. [GLAHS](#)), among others. In fact, traditional knowledge is only mentioned only five times, and is not considered in conservation targets, therefore indicators for SDG 15.6 should be used in this monitoring framework. We offer some feedback and inputs in this document and greater detail in our response to the document Linkages between the Post-2020 Global Biodiversity Framework and 2030 Agenda for Sustainable Development ([click here to read our position](#)).



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