

WCS Position Statement for CBD SBSTTA-24 and SBI-3 Recommendations for CBD Parties and other stakeholders



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Introduction to WCS

The Wildlife Conservation Society (WCS) is an international non-governmental organization (NGO) that has been working across the globe for more than 120 years to save wildlife and wild places. We have programs on the ground in more than 60 countries across Asia, Africa, the Pacific, and the Americas that work in partnership with governments, Indigenous Peoples and local communities, the private sector, and other stakeholders on science-based conservation efforts.

To learn more about WCS, please visit www.wcs.org, or for more on our engagement with the Convention on Biological Diversity (CBD) and the Post-2020 Global Biodiversity Framework (GBF), please visit www.wcs.org/cbd.

Please contact Dr. Susan Lieberman (slieberman@wcs.org), WCS Vice President for International Policy, and Alfred DeGemmis (adegemmis@wcs.org), Senior Manager for International Policy, with any questions.

Summary Recommendations

- Under **SBSTTA agenda item 3 ("the post-2020 global biodiversity framework")**, SBSTTA should improve the draft monitoring framework ([SBSTTA/24/3/Add.1](#)) by recommending the CoP:
 - organize the monitoring framework to reduce complexity and reduce duplication;
 - retain indicators that have been endorsed and used by Parties (such as the [ICRI-recommended coral reef indicators](#));
 - address critical gaps (e.g. on the risk to human health from exploitation and trade of biodiversity); and
 - establish a technical expert group, including qualified experts from civil society, to further refine the existing list of indicators and their methodologies.
- Under **SBSTTA agenda item 3 ("the post-2020 global biodiversity framework")**, SBSTTA should support ambitious, evidence-based quantitative targets, including an overarching, 'nature-positive' goal for net gain of natural ecosystems, and, in support of this, a target to protect and

conserve at least 30% of global land and sea areas through protected areas and OECMs by 2030.

- Under **SBSTTA agenda item 6 (“Marine and coastal biodiversity”)**, SBSTTA should amend the draft recommendation to encourage further work by CBD Parties and the Secretariat on implementation of the GBF with respect to marine OECMs, highly vulnerable habitats like coral reef ecosystems, and threats posed by anthropogenic underwater noise.
- Under **SBSTTA agenda item 9 (“Biodiversity and health”)**, SBSTTA should recommend to continue trans-sectoral review and enhance multilateral buy-in for the draft Global Action Plan on Biodiversity and Health.
- Under **SBI agenda item 5 (“Resource mobilization and the financial mechanism”)**, SBI must identify the need to close national and international biodiversity finance shortfalls (‘gaps’) by eliminating financial flows (including subsidies) and incentives that are harmful to biodiversity, regulation of the private sector, and increasing positive flows for biodiversity (particularly to developing countries).

24th Meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA-24)

SBSTTA-24 Agenda Item 3: “Post-2020 global biodiversity framework”

Primary Document and Draft Recommendation: [SBSTTA/24/3](#)

Addenda: [SBSTTA/24/3/ADD1](#); [SBSTTA/24/3/ADD2](#)

Information Documents: [SBSTTA/24/INF/9](#); [SBSTTA/24/INF/10](#); [SBSTTA/24/INF/11](#); [SBSTTA/24/INF/12](#); [SBSTTA/24/INF/16](#); [SBSTTA/24/INF/23](#); [SBSTTA/24/INF/24](#); [CBD/POST2020/WS/2019/10/2](#); [CBD/POST2020/WS/2020/5/2](#)

General Comments

WCS commends the CBD Secretariat and the Co-Chairs of the Open-Ended Working Group (OEWG) on the post-2020 global biodiversity framework (GBF) for their efforts to guide Parties through the negotiation of the post-2020 GBF.

With respect to the scope and formulation of post-2020 goals and targets, WCS remains generally aligned with the [recommendations in a joint discussion paper](#) on the updated zero draft of the GBF that was issued by several conservation organizations (including WCS) in January 2021. This WCS document for SBSTTA-24 focuses on the technical basis for goals/targets and the draft monitoring framework (building on our peer review comments on [SBSTTA/24/3/ADD1](#) and [SBSTTA/24/3/ADD2](#) – see [wcs.org/cbd](#)).

As a general comment, we welcome the interventions from Parties such as Uganda and New Zealand during informal sessions of SBSTTA that addressed the unique and important role of ecosystem conservation in the GBF, as well as interventions from Colombia, Costa Rica, Egypt, Ethiopia, France, Spain, and many others on the urgent need to conserve fragile marine ecosystems. Our overarching advice is that **conserving both the extent and integrity of natural ecosystems is essential to combatting the biodiversity, climate, and health crises**, including preventing the next pandemic of zoonotic origin. There are indicators in the current draft monitoring framework where data are publicly available at site, national and global scales, are updated annually, and can be easily used by Parties to measure progress on goals related to the conservation of ecosystem extent and integrity. More detail is provided below.

WCS generally supports the proposed terms of reference for a Technical Expert Group, and looks forward to working with Parties through CoP16 to refine indicators for the post-2020 GBF.

Specific Comments on Components, Quantitative Figures, Indicators, and Baselines

SBSTTA-24 has been asked by the COP and the OEWG to review the “scientific and technical information” related to the updated goals and targets, as well as “related indicators and baselines” in an updated draft

of the monitoring framework for the GBF. We have therefore focused our comments for SBSTTA-24 on these issues.

The current draft of the monitoring framework is much improved, but it is still complex. Parties could continue to simplify the framework by: 1) ensuring that outcome indicators (including proxy indicators for the state of biodiversity where necessary) are included at the goal level, while process- or policy-based indicators are included at the target level; 2) re-organizing or re-numbering the indicators so that they follow a logical framework where indicators are organized in groups under components; and 3) noting where indicators are relevant to more than one target to reduce repetition.

WCS generally supports the approach to baselines as articulated in the draft decision for CoP15 to “use 2020, or the period from 2016 to 2020, or the closest year(s) for which data is available, as appropriate, as a reference period for monitoring the implementation of the post-2020 global biodiversity framework at the global level.” This does not preclude the use of alternate baselines where relying on national data or other tools; however, it is critical to agree to a broad baseline for global analyses and stock-taking processes. The indicators we recommend for adoption (see below) will have baselines within this window.

A couple of key technical issues for consideration by SBSTTA-24 concern **quantitative figures for targets**:

- **Increasing the area, connectivity and integrity of natural ecosystems by X% by 2030 (Goal A):** It is possible and necessary to achieve a nature-positive world by 2030, including a global net gain in natural ecosystem extent *and* integrity. WCS and many partner organizations all recommend that the draft mission statement be clarified, to aim for a net gain in the status of biodiversity and nature’s contributions to people (‘nature positive’) by 2030 (www.naturepositive.org). This requires that ambitious actions start immediately. Indicators are available to measure progress against goals for net gain in ecosystem extent and integrity, but will vary by ecosystem type depending on how data are collected (see below).
- **Protecting and conserving 30% of land and sea by 2030 (‘30x30,’ Target 2):** Surveys of peer-reviewed scientific research have demonstrated that greater ambition is needed in the scale and level of implementation of area-based conservation measures to achieve conservation and sustainable use objectives ([IPBES 2019](#); [Woodley et al. 2019](#); [O’Leary et al. 2016](#); [Noss et al. 2012](#)), and 30% of land and sea is generally considered to be a global minimum threshold with broad political support ([High Ambition Coalition 2020](#); [IUCN 2016](#)). More specifically, using available data on species’ ranges and biological needs, we can infer that that a greater proportion of the planet must be protected or conserved than is in place today to avoid endangered status on the IUCN Red List, particularly with projections for climate change and land use change ([Hanson et al. 2020](#); [Hannah et al. 2020](#); [Allan et al. in review](#)). Similar approaches for marine species and ecosystems have demonstrated that a minimum of 26 percent to 41 percent of the ocean needs to be effectively conserved and managed, with a higher figure likely with additional data on marine biodiversity and ecological processes ([Jones et al. 2020](#)). Protected areas can also secure ecosystem integrity and function, protecting valuable ecosystem services like fisheries ([Leary et al. 2016](#)), climate change regulation ([Dinerstein et al. 2019](#)), and can also contribute to preventing zoonotic pathogen spillover that can lead to epidemics and pandemics ([IPBES 2020](#); [Evans et al. 2020](#); [Pizarro et al. in press](#); [Terraube et al. 2017](#)). Finally, Indigenous Peoples manage or have rights to the majority of highly intact ecosystems worldwide ([Garnett et al. 2018](#); [Shuster et al. 2019](#); [Fa et al. 2019](#)), and therefore successful Indigenous-led conservation and customary co-management approaches are essential to ensuring the success of Target 2 and the GBF ([Rights and Resources Initiative 2020](#)).

Select technical comments on the draft monitoring framework ([SBSTTA/24/3/ADD1](#)) are provided below. We would be glad to discuss the issues below, or other parts of the monitoring framework, in advance of SBSTTA-24. These recommendations are also available as track changes to 3/ADD1 at www.wcs.org/cbd.

DRAFT Goal or Target	WCS comments on:		
	Components	[Numeric] Figures	Indicators
<p>Goal A (2050): <i>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;</i></p> <p>GA Milestones (2030): <i>(i) The area, connectivity and integrity of natural systems increased by at least [5%].</i> <i>(ii) The number of species that are threatened is reduced by [X%] and the abundance of species has increased on average by [X%]</i></p>	<p>We welcome the attention to <i>integrity</i> of natural ecosystems, which is necessary to conserve alongside their extent to properly evaluate the status of biodiversity and its contributions to people.</p> <p>The word “increases” is used for ecosystem extent, integrity and connectivity in Goal A, but the application of “increases,” and any reporting guidelines, must be clarified. WCS recommends a return to a goal of “net gain” of all three attributes of natural ecosystems. This returns to a holistic view of ecosystem loss and restoration, whereas “increases” could be interpreted more narrowly.</p>	<p>A single quantitative figure across all three elements of ecosystems (area/extent, integrity and connectivity) is not universally possible, and a single figure across all natural ecosystems may not be advisable given the large variation in threats faced by different ecosystem types. We recommend adding “each” before “increased,” or to identify separate figures for each dimension based on indicators. However, it is possible to quantify net increases in extent and/or integrity based on indicators available for different ecosystem types (see right).</p>	<p>Headline indicator(s) for Goal A at the ecosystem level address only extent. Noting the findings of SBSTTA/24/3/ADD2 (paras 15, 19, 40, etc.), we recommend including ecosystem integrity indicators at the headline level where they are already available.</p> <p>Indicators are available to measure progress against goals for net gain in ecosystem extent and integrity, but will vary by ecosystem type depending on how data is collected. For example, the Ecosystem Intactness Index [currently included as A.1.1.33 “Ecoregion Intactness Index”] (Beyer et al. 2019) can measure the integrity and connectivity of all terrestrial ecosystems. Specific ecosystems will have even more precise tools. For example, A.1.1.26 / 1.1.1.12 “Forest Landscape Integrity Index” (forestintegrity.com; Grantham et al. 2020) can measure the extent and integrity of all forest ecosystems by incorporating remotely sensed data on forest cover. Also, the International Coral Reef Initiative (ICRI) has recommended a suite of coral reef indicators (ICRI 2020) that draw on monitoring programs currently in place, and can be used in aggregate to measure the extent and integrity of coral reefs (see here for ICRI advice based on Add.1). Key coral reef indicators (e.g. A.1.1.14; A.1.1.20; A.1.1.47) should be retained and prioritized post-2020.</p>

	<p>It is essential to include a 2030 goal on reducing threats to species in the GBF, but this must be inclusive of: (i) halting human-induced extinctions; (ii) reducing the overall risk of species extinctions; and (iii) increasing average population abundance of native species (Williams et al. 2020)</p> <p><i>Other comments:</i></p> <ul style="list-style-type: none"> • Add: Grassland, savannahs as priority ecosystems for headline indicators. • Delete: Component A.6. “Protection of critical ecosystems” (or move to T2). 	<p>Williams et al. (2020) proposes a formulation for an updated species “target” (or goal in this context) that sets quantitative goals for the components outlined (see left): halting or eliminating 100% of human induced species extinctions from 2020 onwards, reducing the overall risk of species extinctions by 20% by 2030 (and 100% by 2050), and increasing (on average) the population abundance of native species by 20% by 2020 such that they return to 1970s values by 2050.</p>	<p>The components outlined (see left) have existing indicators:</p> <ul style="list-style-type: none"> • <i>Extinctions can be measured using the IUCN Red List.</i> • <i>Overall risk of species extinctions can be measured using A.0.3 the IUCN Red List Index.</i> • <i>Population abundance can be measured using population indices, of which the best known are A.1.1.43. the Wild Bird Index and A.0.2 the Living Planet Index (see Williams et al. 2020 for citations.</i> <p><i>Other comments:</i></p> <ul style="list-style-type: none"> • Retain: A.1.1.8 “Red List of Ecosystems” • Add: An indicator that reflects local extirpations, already recorded at the national level, in addition to global extinctions. • Add: IUCN Green Status of Species Index (included as B.1.1.3; 3.1.1.2) for species recovery.
<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>Spatial planning is an essential action that underpins and connects many other interventions in the framework (e.g. T2, T7, T13). However, spatial planning is a tool and not an objective in itself; therefore, T1 must explicitly seek to reduce threats to biodiversity (as articulated through Components 1.2, 1.3) through land and sea use change.</p>	<p>The [50%] figure in the current draft is less ambitious than the zero draft. Many terrestrial and marine areas are already under some form of spatial planning. As mentioned at left, spatial planning is also a pre-requisite to achieving the other goals and targets and can be undertaken immediately. Therefore, we propose revising to “<u>100%</u> of land and sea areas.”</p>	<p>We note that the headline indicator now addresses landscape (and presumably seascape) scale spatial planning for all ecosystem types (terrestrial, freshwater and marine). The asterisk indicates that this requires further development; the TEG should explore means to track spatial plans that are not just landscape scale, but that address and prioritize biodiversity and that are multi-sectoral and comprehensive.</p>

	<p>The science is clear that highly intact ecosystems are critical for biodiversity conservation, climate change mitigation and adaptation, etc. (Watson et al. 2018; Cinner et al. 2020); and yet they are disappearing rapidly (Williams et al. 2020; Venter et al. 2017; Halpern et al. 2019; Jones et al. 2018). The retention of intact areas should be central to any spatial planning processes, given that we cannot achieve our conservation goals (i.e. Goal A) without halting and reversing their degradation and loss (Diaz et al. 2020, Bull et al. 2019, Maron et al. 2018).</p> <p><i>Other comments:</i></p> <ul style="list-style-type: none"> • <i>Spatial planning should include One Health approaches to ecosystem degradation, as well as zoonotic disease hot spots and high risk interfaces.</i> 		<p>We note that B.1.1.16 “Intact wilderness” is currently included as an indicator under Goal B. We believe this is more appropriate under T1, given the reference to intact and wilderness areas, or in Goal A, since we can measure the outcomes or status of these ecosystems through, e.g. Ecosystem Intactness Index [currently included as A.1.1.33 “Ecoregion Intactness Index”] (Beyer et al. 2019), the A.1.1.26 / 1.1.1.12 “Forest Landscape Integrity Index” (forestintegrity.com; Grantham et al. 2020) or the Human Footprint Index (Venter et al. 2016). Note: Generally, we prefer the term “intact areas” to “wilderness” in the context of the GBF, as “wilderness” has negative connotations in some contexts.</p> <p><i>Other comments:</i></p> <ul style="list-style-type: none"> • <i>Retain: 1.1.1.2 “Percentage of spatial plans utilising information on key biodiversity areas” is a critical indicator to assist with mainstreaming biodiversity into spatial plans.</i> • <i>Delete: 1.1.1.7 “Percent of total land area that is under cultivation.” This alone could provide perverse incentives without language in the target to suggest that space dedicated cultivation is not necessarily positive.</i>
<p>Target 2: By 2030, protect and conserve through well connected and <i>effective</i> system of protected areas and other <i>effective</i> area-based conservation measures at least 30 per cent of the</p>	<p>It is essential that the <u>effectiveness</u> of any existing and new area-based measures be addressed in T2 and monitored through the GBF monitoring framework in order to ensure that actions taken to achieve T2 are</p>		<p>Current T2 headline indicators address the placement of area-based measures in places important for biodiversity, we recommend replacing headline indicator 2.0.2. “Species Protection Index’ with an indicator that</p>

<p><i>planet with the focus on areas particularly important for biodiversity.</i></p>	<p>actually working (unlike at present, see Jones et al. 2018). This will be addressed several ways, including, for example, the outcome or state-based indicators at the goal level for species and ecosystems. However, there are also tools available at present (see right) that specifically address effectiveness by assessing ecological and social outcomes at the site level (protected areas and OECMs).</p> <p>As stated above, an updated quantitative target for area-based conservation is an essential component to the post-2020 GBF. WCS was pleased to work with governments on national, regional and global efforts to expand protected and conserved areas (particularly in the marine realm) in response to Aichi Target 11, and believe that increase ambition is welcome at a global scale.</p> <p>We welcome the attention paid to ensuring that area-based conservation measures are located in places important for biodiversity, including Key Biodiversity Areas, intact ecosystems, etc.</p>	<p>The best available science indicates that <u>at least 30%</u> of global land and sea will need to be protected or conserved to reach our biodiversity, climate and sustainable development goals (see full list of citations above this table). Although this figure varies by ecosystem type, etc., WCS research (Allan et al. in review; Jones et al. 2020; McClanahan et al. 2021) supports the scientific and technical basis for at least 30% as a politically desirable <u>minimum</u> target for Parties to set for 2030.</p>	<p>addresses effectiveness and/or ecological outcomes (and marine environments). 2.1.1.5 “Green List of Protected and Conserved Areas” addresses both management effectiveness and ecological outcomes, and is already in use as a global standard (but is resource-intensive). We welcome the intent of 2.1.6 “Area of Protected areas and other effective area-based conservation measures meeting their documented ecological objectives,” but note that the methodology is unclear (requires attention by TEG).</p> <p>We note that some of the existing indicators for Target 2 do not consider OECMs, which will be a critical addition to the post-2020 framework but do require guidelines for implementation and reporting (Alves-Pinto et al. 2021). Indicators updated or developed to address OECMs should be in line with technical guidance from CBD (Decision 14/8) and the IUCN WCPA guidance (IUCN-WCPA Task Force on OECMs 2019)</p> <p>We welcome that the headline indicators both address the overlap between protected and conserved areas and geographies important for biodiversity (Key Biodiversity Areas [2.0.1] and species ranges [2.0.2]). KBAs are inclusive of important ecological aspects, such as integrity, but KBA identification, particularly in marine ecosystems, will require technical and financial support.</p>
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			<p><i>Other comments:</i></p> <ul style="list-style-type: none"> Existing indicators for connectivity within PA systems (2.1.5.; 2.1.1.11.) appear to be terrestrial only; there is a gap regarding connectivity among marine area-based measures. Move: 3.0.1 “Protected areas management effectiveness” to T2. Add a headline indicator to address the “stage of establishment and degree to which protected areas and OECMs prohibit harmful industrial and non-industrial activities.” This should address the fact that some activities incompatible with ecosystem conservation should not take place in PAs or OECMs.
<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>The component of this target related to human-wildlife conflict may belong better in another target.</p>		
<p>Target 4: By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora is <i>legal</i>, at <i>sustainable levels</i> and <i>safe</i>.</p>	<p>It is important to eliminate illegal exploitation, which threatens to undermine species conservation and governance. This should address local and national legality, as well as international frameworks such as CITES and CMS.</p>	<p>It is important to clarify that <u>all (or 100%) of illegal exploitation and trade should be effectively eliminated</u>, given that national and international protections are often designed to protect threatened or potentially threatened biodiversity.</p>	<p>It will be important to build on, and refine, existing indicator Proportion of traded wildlife that was poached or illicitly trafficked [by species group] (SDG indicators 15.7.1 and 15.c.1; UNSD metadata). However, there are likely complementary “process” indicators that can be used, e.g. current indicator 4.1.1.1./ 8.1.1.2 (SDG Indicator 14.6.1; UNSD metadata). A similar indicator (“[Degree of implementation of international instruments aiming to combat wildlife and forest crime]”)</p>

	<p>We note that legal exploitation is not inherently or necessarily sustainable. We also note that <i>any</i> trade which poses a risk of zoonotic pathogen spillover that could lead to epidemics or pandemics is inherently unsustainable and contrary to achieving our 2050 goal of living in harmony with biodiversity (a conclusion reinforced by SBSTTA/24/3/ADD2). Therefore, exploitation can only be truly sustainable when it minimizes the risk of zoonotic pathogen spillover. This reality requires broad, preemptive and precautionary policy responses that are synergistic with a transformative GBF.</p>		<p>could examine implementation of international instruments to combat wildlife and forest crime (a terrestrial version of SDG indicator 14.6.1 on international instruments on IUU fishing), with support from UNODC and others.</p> <p>In order to evaluate whether wildlife exploitation or trade is biologically and ecologically sustainable, the most easily available source of standardized information would be the “IUCN Red List assessments of species that are commercially exploited, those in international trade, and those listed on the CITES Appendices” (these would be similar to IUCN Red List dis-aggregations by species groups in 9.1.1.2.; 9.1.1.3; etc.) However, there are also complementary <i>process</i> indicators, such as the proportion of threatened species with legal prohibitions on commercial exploitation, and trends in CITES-listed species flagged by CITES “Review of Significant Trade” analyses. Importantly, <u>none of the present indicators address the risks to human health from exploitation and trade</u>; as such, there should be an indicator tracking the legal prohibitions on exploitation and trade of taxonomic groups that pose risks to human health (mammals, birds) and/or application of WHO/OIE guidance.</p> <p><i>Other comments:</i></p> <ul style="list-style-type: none"> • A proposed wording and indicator framework for T4 is available here.
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<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>Noise pollution is mentioned in paragraph 71 of SBSTTA/24/3/ADD2 as a threat to biodiversity, but noise pollution, and particularly underwater anthropogenic noise pollution, is not currently recognized in the draft monitoring framework.</p>		<p>A wide variety of potential indicators on underwater anthropogenic noise pollution are already available based on national, multilateral and civil society initiatives (Chou et al. 2021). Indicators could focus on whether the programs, approaches, guidelines called for or endorsed by governments, e.g. to quiet or re-route shipping vessels or avoid doing activities in close proximity to marine mammals: a) are being implemented by governments or sub-national stakeholders, and b) are successfully reducing negative impacts on biodiversity.</p>
<p>Target 7: By 2030, increase contributions to climate change mitigation adaption and disaster risk reduction from nature-based solutions and ecosystems-based approaches, ensuring resilience and minimizing any negative impacts on biodiversity.</p>	<p>“Nature-based solutions” (NbS) are an appropriate term that encapsulates other approaches (e.g. “ecosystem-based approaches” under CBD), but they must adhere to IUCN guidance (IUCN 2020) and avoid pitfalls identified by Seddon et al. 2021. This target can be simplified by referring to the umbrella term of NbS.</p>		<p>Indicators to track uptake of NbS and their contributions to climate mitigation and adaptation can rely on information submitted by Parties through, e.g., UNFCCC policy processes, but should adhere to IUCN guidance on NbS (see left), including co-benefits for biodiversity and ecosystem integrity, balanced representation of interventions across ecosystem types, and full respect for the rights and participation of IPLCs.</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>It is essential for biodiversity and biodiversity values to be mainstreamed into all policies, regulations and planning, including those policies and processes in sectors that have direct impacts on biodiversity (e.g. infrastructure, agriculture, fisheries). This needs to be inclusive of public and private sector actions and investments. It may also be important to start explicitly addressing health (biodiversity and human health) in impact assessment processes.</p>		<p>Indicators for this target should track the extent of adoption and implementation of policies, and particularly legal and regulatory frameworks, at the national and international levels (including multilateral financial entities and public development banks), that formalize the mitigation hierarchy and other globally recognized approaches to avoiding, minimizing and offsetting development impacts on biodiversity.</p>

16 April 2021

SBSTTA-24 Agenda Item 6: “Marine and coastal biodiversity”

Primary Document: [SBSTTA/24/6](#)

Addenda: N/A

Information Documents: [SBSTTA/24/INF/1](#); [SBSTTA/24/INF/2](#); [SBSTTA/24/INF/3](#); [SBSTTA/24/INF/4](#); [SBSTTA/24/INF/10](#); [SBSTTA/24/INF/23](#); [SBSTTA/24/INF/24](#); [CBD/POST2020/WS/2019/10/2](#); [CBD/EBSA/WS/2020/1/2](#)

WCS welcomes the work of the CBD Secretariat and Parties on marine and coastal biodiversity. WCS has a large and active marine conservation program across the globe, where we focus on marine protected and conserved areas, sustainable coastal fisheries, and marine species conservation (including cetaceans, sharks and rays). We were pleased to attend and engage actively during the CBD thematic consultation on marine and coastal biodiversity, held in November 2019. We take this opportunity to address three key issues under consideration by Parties at SBSTTA-24.

Identification and monitoring of marine OECMs

We are generally supportive of the OECM concept, which can support the recognition of biodiversity outcomes in a broad variety of area-based measures and lead to greater support for diverse governance systems. However, we are concerned that the definition of OECMs and relevant criteria adopted by CBD Parties ([Decision 14/8](#)) and guidance developed by IUCN ([IUCN-WCPA Task Force on OECMs 2019](#)) have been interpreted in different ways by stakeholders. **We stress that positive biodiversity outcomes, including at the ecosystem scale, are critically important for OECM designation (and of course are vital for protected areas as well).** It is vital that OECMs not be declared unless they meet the criteria in CBD Decision 14/8. As qualified international organizations like the UN Food and Agriculture Organization (FAO) support the identification of OECMs in the marine capture fisheries sector, **we strongly recommend that regional capacity building workshops engage all relevant ministries, stakeholders from the CBD Secretariat and IUCN (including the [World Commission on Protected Areas](#)), and technically qualified civil society organizations to ensure that all relevant criteria are being met by candidate OECMs.**

Coral reef ecosystems

WCS welcomes the efforts of Parties to achieve Aichi Target 10 on coral reefs and other associated ecosystems, which are summarized in both [GBO-5](#) and [SBSTTA/24/INF/2](#). There is no exact corollary to Aichi Target 10 in the current draft GBF, despite the unique importance of these ecosystems for biodiversity conservation and the significant, immediate threats that they face. We therefore strongly urge Parties to ensure that goals, targets and indicators of the GBF are developed with coral reef ecosystems in mind.

WCS is a member of the International Coral Reef Initiative (ICRI), along with [over 40 CBD Party governments](#), which has developed a consensus recommendation to CBD Parties on how to ensure the GBF properly reflects the urgency and practicalities of coral reef conservation (see [coralpost2020.org](#)). In line with this recommendation, we urge Parties to refine a robust monitoring framework with globally standardized coral reef indicators at SBSTTA-24, and prioritize coral reef conservation in the guidance to the financial mechanism to be considered by SBI and adopted at CoP15 (see SBI-3).

We again urge Parties to reflect [the recommendations of ICRI in their comments on indicators in the draft monitoring framework](#) (under agenda item 3), but we also recommend the following amendments to operative paragraph 8 of the draft decision for CoP15 (under agenda item 6) to set the stage for implementation:

8. Encourages Parties and invites other Governments and relevant organizations to use the information referred to in paragraph 7 above in their efforts to conserve and sustainably use marine and coastal biodiversity, ~~and requests the Executive Secretary to facilitate the compilation, synthesis and sharing of information on efforts to implement the post-2020 global biodiversity framework with respect to various thematic issues related to marine and coastal biodiversity;~~

8bis. Requests the Executive Secretary, and invites Parties, other Governments and relevant organizations, to facilitate or support the development of guidance for Parties on implementation of the post-2020 global biodiversity framework with respect to key thematic issues, including the application of goals and targets to coral reefs and other vulnerable and important ecosystems;

8bis2: Requests the Executive Secretary to facilitate the compilation, synthesis and sharing of information on efforts to implement the post-2020 global biodiversity framework with respect to marine and coastal biodiversity;

Underwater anthropogenic noise

WCS welcomes the attention of the CBD Secretariat and Parties to the critically important issue of underwater anthropogenic noise ([Duarte et al. 2021](#)). We were pleased to contribute our scientific expertise and technical advice during the peer review of the Information Document on this subject (not yet published). However, we note that noise pollution has been removed from the draft monitoring framework under Target 6 of the GBF. We believe this should be remedied, and **work should be undertaken by expert networks in advance of CoP15 to identify practical indicators for Parties to use, where appropriate, to measure the implementation and impact of mitigation measures**. A recent peer-reviewed paper by [Chou et al. \(2021\)](#) is an excellent review of international policy, recommendations, and actions relevant to anthropogenic underwater noise. **We recommend Parties amend the draft decision to request further work on this critical issue between CoP15 and CoP16**, including application of any GBF targets on spatial planning, protected and conserved areas, or pollution to this threat to biodiversity.

SBSTTA-24 Agenda Item 9: “Biodiversity and health”

Primary Document: Not yet available.

Addenda: Not yet available.

Information Documents: Not yet available.

WCS welcomes the attention of CBD Parties and the Secretariat to national and international efforts at the nexus of biodiversity and health, and we thank the Secretariat for the opportunity to provide comments on the draft Global Action Plan for Biodiversity and Health. The [WCS Health Program](#) is one of the oldest zoological veterinary programs in the world and a global thought leader in One Health approaches. We are the only large international conservation organization with an embedded wildlife health program, but we also engage at the international and intergovernmental policy level. For example, WCS and the German Federal Foreign Office co-hosted an October 2019 event, “[One Planet, One Health, One Future](#).” Participants at this high-level event endorsed the Berlin Principles, which has now been published in a peer-reviewed journal and serves as a framework document for the One Health approach ([Gruetzmacher et al. 2020](#)).

At the time of writing, the working document SBSTTA/24/9 was not yet published. However, we take this opportunity to summarize some general feedback on the draft Global Action Plan on Biodiversity and Health, and propose a way forward for Parties. **Our full comments on the draft Global Action Plan are available [here](#) at [wcs.org/cbd](#).**

First, the draft Global Action Plan requires greater clarity and urgency with respect to the urgent, ambitious transformations to existing policies and practices. This includes the actions necessary in order to prevent pathogen spillover from wildlife, and therefore the next global pandemic of zoonotic origin. Such actions should include closing commercial markets and trade for live and fresh wildlife, particularly birds and mammals, for human consumption ([WCS 2020](#); [Xiao et al. 2021](#)). However, this is not the only action needed. There is a large body of evidence tying the loss of integrity in natural ecosystems to emerging infectious diseases, and to other negative impacts on human health ([Evans et al. 2020](#); [Morand and Lajaunie 2021](#); [Gibb et al. 2020](#)). There is therefore an urgent need to take actions from planning and impact assessment all the way through exploitation, trade and use of wildlife in order to change our relationship with the natural world.

Second, all efforts must be made to ensure that this Global Action Plan is not only “cross-sectoral,” which can mean that its underlying concepts or proposed activities are implemented by different sectors, but “trans-sectoral” – meaning that it avoids silo-ing of approaches and activities by different sectors ([de la Rocque and Formenty 2014](#); [Hadorn et al. 2008](#)). We also note that CBD Decision 14/4 also invited the WHO to “consider establishing a regular reporting mechanism for the progress of activities on biodiversity and health under the joint work programme of the Convention on Biological Diversity and the World Health Organization” (operative paragraph 11(b)). It is not clear from this document how this CBD Global Action Plan will be aligned with, or otherwise mutually reinforce, those activities mentioned throughout that involve national health plans or multilateral governance under e.g. the WHO or OIE. The Global Action Plan should strive for greater collaborative design among these multilateral organizations, and the different sectors they convene, to ensure coherent and mutually supportive implementation. We therefore believe that Parties should launch a process of further review, revision, and strengthening by members of the Inter-Agency Liaison Group on Biodiversity and Health, and technically qualified experts. **With additional expert review and sufficient buy-in, this Global Action Plan can become central to our efforts to address the biodiversity and health nexus.**

3rd Meeting of the Subsidiary Body on Implementation (SBI-3)

SBI-3 Agenda Item 5: “Post-2020 Global Biodiversity Framework”

Primary Document: [CBD/SBI/3/4](#)

Note: WCS has addressed the items in the Annex to SBI/3/4 in other agenda items, as suggested in document CBD/SBI/3/4.

SBI-3 Agenda Item 6: “Resource Mobilization and the Financial Mechanism”

Primary Documents: [SBI/3/5](#); [SBI/3/6](#)

Addenda: [SBI/3/5/ADD1](#); [SBI/3/5/ADD2](#); [SBI/3/5/ADD3](#); [SBI/3/6/ADD1](#); [SBI/3/6/ADD2](#); [SBI/3/6/ADD3](#)

Information Documents: [SBI/3/INF/2](#); [SBI/3/INF/5](#); [SBI/3/INF/7](#); [SBI/3/INF/23](#); [CBD/POST2020/WS/2020/3/3](#)

General comments

WCS welcomes the conclusions of the Resource Mobilization Expert Panel ([SBI/3/5/ADD3](#)) that three critical steps needed post-2020 are to: (a) reduce or redirect resources causing harm to biodiversity; (b) generate additional resources from all sources; (c) enhance the effectiveness and efficiency of resource use. These conclusions are supported by the findings of global assessments, including the OECD’s global assessment of biodiversity finance ([OECD 2020](#)) and the TNC and Paulson Institute’s Financing Nature report ([Deutz et al. 2020](#)). This overarching structure is in line with [WCS’s initial advice on resource mobilization post-2020](#) and a joint intervention during informal virtual sessions of SBI (see [here](#)).

Closing the international “biodiversity finance gap” through GBF goals and targets

Deutz et al. ([2020](#)) demonstrated that the global biodiversity finance gap is currently approximately \$700 billion USD per year. Closing a gap of this magnitude will require significant effort by all CBD Parties, including, but not limited to, an increase in concessional flows to developing countries – for example through official development assistance (ODA).

At CBD CoP15, we recommend Parties adopt a shared global goal to close the existing national and international biodiversity finance gaps, as well as more specific, quantitative targets for a collective increase of domestic and international spending on biodiversity and nature conservation. In developing this goal and set of targets, **Parties should again commit to significantly increasing international flows to developing countries**, either as a percentage increase (with indicators including and going beyond ODA as

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laid out in CBD [Decision 12/3](#)), or by identifying a proportional target (such as requiring that at least 10% of global ODA flows or broader government budgets have explicit biodiversity co-benefits).

We acknowledge that another doubling of the current levels of ODA flows (the previous resource mobilization target), while significant and urgently needed, would not sufficiently address this global biodiversity finance gap. This is driven in part by harmful financial flows, including government subsidies, and harmful economic and policy incentives (OECD 2020). Therefore, comprehensive actions to draw down financial flows that are harmful to biodiversity, including **targets to eliminate government subsidies that are harmful to biodiversity, “nature-proof” all foreign investment and aid, and regulate the financial sector and other private sector operations, are also essential to closing the biodiversity finance gap.**

Parties must also ensure that any/all national, bilateral or multilateral investments in biodiversity conservation are sustainable by: codifying financial commitments through national or sub-national policy change; securing new revenue streams; capitalizing conservation trust funds or other endowments; and prioritizing highly intact - and therefore resilient – ecosystems ([Martin and Watson 2016](#)).

In summary, SBI should encourage Parties to adopt an ambitious, and forward-looking global biodiversity framework and resource mobilization strategy that:

- Has an overarching goal (e.g. under Goal D of the updated zero draft of the GBF) to close the global biodiversity finance gap, with measurable and specific 2030 action targets that contribute to this goal by, e.g., regulating public and private investments (draft Target 13, and others), eliminating all harmful government subsidies (draft Target 17), and significantly increasing positive financial flows for implementation (draft Target 18).
- Recognizes that a wide variety of targets will have financial implications; for example, targets that seek to retain biodiversity (by halting incursion or disturbance of intact ecosystems, maintaining or increasing species diversity and population abundance) are more cost effective than restoration. Indeed, at a global scale these retention-oriented policies are the only way to achieve biodiversity, climate and development objectives ([Sonter et al. 2019](#)).
- Support the development and implementation of national biodiversity finance plans, including close integration or co-evolution with NBSAPs, to ensure that appropriate policy actions are taken and biodiversity-related resources are used efficiently.
- Cross-reference and streamline the resource mobilization components across GBF goals and targets, additional GBF sections on resource mobilization, and any CBD resource mobilization strategy. The GBF will serve as an overarching framework for many different stakeholders and the UN system, and Parties must reduce complexity to enhance implementation and reporting.

The financial mechanism (the GEF)

The Global Environment Facility (GEF) continues to effectively mobilize and deliver resources to implement the CBD, including conservation of biodiversity. WCS believes it is important to strengthen the GEF by mobilizing additional resources to meet the ambitious goals of the GBF, streamlining and increasing access to funds, and better aligning its interventions and monitoring programs with the GBF and its monitoring framework to enable stocktaking and evaluation processes at multiple scales.

We acknowledge comments from Parties during the informal virtual sessions of SBSTTA and SBI that implementation of the post-2020 GBF, and particularly the incorporation of reporting against indicators included in the draft monitoring framework, will require additional capacity and resources. Building this capacity at the national and sub-national level is essential to effectively undertake reviews of progress. We therefore urge this to be reflected in the guidance from CoP15 to the financial mechanism, and for indicators adopted for the GBF to become institutionalized for national reporting under the CBD, in voluntary national reviews of progress towards the Sustainable Development Goals, and to measure the impact of the financial mechanism in delivering policy-relevant results. **We strongly encourage Parties to ensure that GEF funding is available to build the capacity of Parties to strengthen monitoring programs**

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that underpin adaptive management of biodiversity and ecosystems. We also note and welcome operative paragraph 17 of the draft decision in [SBI/3/11](#):

17. Requests the Global Environment Facility and invites other funding entities to make funds available in a timely and expeditious manner...to support...the development of national monitoring and information management systems, including the development, identification and use of indicators, for the implementation of the global biodiversity framework...;

Furthermore, as noted above, the generalization of goals and targets will remove specific references to ecosystem types like forests, coral reefs, grasslands, etc. It is important for the GEF to urgently prioritize those ecosystems that are uniquely important for both conservation and sustainable use of biodiversity, and which are urgently threatened by anthropogenic threats such as climate change. **Coral reefs, for example, will need to be monitored and conserved in order to safeguard them from the ongoing threat posed by climate change and are not explicitly prioritized in the current draft program framework for GEF-8.** We therefore urge Parties to draw attention to these highly vulnerable, biodiverse ecosystems that underpin the food and economic security of millions.

Nature-based solutions

The term “nature-based solutions” (NbS) includes a variety of approaches (e.g. “ecosystem-based approaches” historically used under the CBD), and is therefore a useful term to be reflected in the post-2020 GBF to describe nature/biodiversity-positive approaches to societal problems. However, any inclusion of NbS in the post-2020 framework must be accompanied by explicit recognition that NbS adhere to IUCN guidance ([IUCN 2020](#)) and avoid pitfalls identified by [Seddon et al. 2021](#) (e.g. that they are not a substitution for a rapid drawdown in fossil fuels, that they involve a wide range of ecosystems that provide different “solutions” to different problems, and that they must be implemented with full consideration for IPLC rights). Furthermore, we cannot guarantee that *all* critical biodiversity conservation investments will fit under the umbrella concept of NbS, so this term is most appropriate for GBF goals/targets that address nature’s benefits to people. We urge Parties to: 1) establish minimum criteria for any bilateral and multilateral funding of NbS in line with IUCN guidance and existing best practices, and 2) maintain and increase existing budgets for biodiversity and nature conservation that are not explicitly tied to NbS.

SBI-3 Agenda Item 9: “Mechanisms for reporting, assessment and review of implementation”

Primary Document: [SBI/3/11](#); [SBI/3/12](#)

Addenda: [SBI/3/11/ADD1](#); [SBI/3/11/ADD2](#); [SBI/3/11/ADD3/REV1](#)

Information Documents: [SBI/3/INF/11](#)

Given the collective failure to achieve the Aichi biodiversity targets, we believe that the process of enhancing implementation, monitoring, reporting and review of the GBF will be essential to its success. We remain aligned with the joint intervention delivered by ClientEarth on behalf of many organizations, including WCS, during the informal voluntary session of SBI (see [here](#)).

We agree that National Biodiversity Strategies and Action Plans (NBSAPs) should continue to be the primary tool for national planning and implementation, as part of a whole-of-government approach, in line with Article 6 of the Convention. However, some Parties have NBSAPs that remain active through 2030 or beyond. We therefore believe it would be appropriate for CoP15 to encourage Parties, where possible and necessary, to update their NBSAPs in line with newly adopted goals and targets. This should align with a CoP decision that encourages Parties to make national commitments in line with the post-2020 GBF, which could enable global and regional reviews of progress towards GBF targets and provide a foundation for “ratcheting up” of ambitious commitments over time. We do, however, urge more attention be paid to national commitment tracking platforms that allow for accountability and review by geography, ecosystem type, etc. It is essential to reduce overall duplication and confusion among NBSAPs, national reporting and any national commitment mechanism.

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Underlying the relationship between national planning and implementation, national reporting, national commitments and any global analytical or voluntary peer reviews of progress are the globally standardized indicators that are being negotiated as part of the draft monitoring framework for the GBF. There has been significant attention to developing a robust, practical and effective set of headline indicators to enhance global review of CBD implementation post-2020. However, many key indicators that may not meet the criteria for headline indicators are essential for Parties to monitor against while implementing the GBF, and would figure into national commitments. For example, key forest or coral reef indicators agreed to by members of ICRI may not be suitable at the headline level, due to the fact that they are ecosystem-specific. Therefore, we encourage adoption of a full and robust monitoring framework at CoP15, recognizing that the TEG may wish to refine it further before CoP16, and urge Parties (and other stakeholders) to invest domestically and internationally in the capacity to monitor against all relevant indicators. This is related to our recommendations regarding the financial mechanism above.

WCS stands ready to assist Parties with implementation, monitoring, reporting and review of the post-2020 GBF.

SBI-3 Agenda Item 11: “Mainstreaming of biodiversity within and across sectors and other strategic actions to enhance implementation”

Primary Document: [SBI/3/13](#)

Addenda: [SBI/3/13/ADD1](#)

Information Documents: [SBI/3/INF/6](#); [SBI/3/INF/10](#); [SBI/3/INF/21](#)

We remain aligned with the joint intervention delivered by The Nature Conservancy on behalf of several organizations, including WCS, during the informal virtual session of SBI (see [here](#)). Despite COVID-19 making it clear that our consumption patterns and associated widespread degradation of natural ecosystems entail significant, unacceptable health and economic risk, collective efforts to mainstream biodiversity into key sectors and mitigate the drivers of biodiversity loss have been insufficient.

It is therefore essential to re-double our efforts to address the direct and indirect drivers of biodiversity loss and transform the key sectors that have been identified by CBD Parties already through the mainstreaming discussions, including in particular forestry, fisheries, agriculture, infrastructure and health. Efforts to mainstream biodiversity must be trans-sectoral, and not just cross- or multi-sectoral – in other words, it is essential to ensure that Parties’ focal points for biodiversity and all of these different sectors are operating with the same understanding of terms and policies and working to achieve the same mutually coherent objectives (and targets).

We urge Parties to focus on negotiating and adopting a GBF, including goals and targets, at CoP15 that includes measurable targets directly, and explicitly, addressing the sectors referred to above. These post-2020 targets should be informed by expertise within these sectors and experience implementing CBD decisions on mainstreaming to achieve maximum buy-in and enhance implementation. However, this collaboration must not dilute the ambition of the GBF overall. Ultimately, all sectors must contribute to a biodiversity- and nature-positive future that includes net gain in the extent and integrity of natural ecosystems and other biodiversity values.

For example, the GBF can and must trigger policy change and actions – including investments – that shift global food systems towards agricultural practices and commodities that reduce land and sea use change and associated impacts on biodiversity. The GBF should require Parties to make changes – including at the finance and planning stages - to halt perverse subsidies and investments in infrastructure that increase access to highly intact ecosystems, thereby avoiding and minimizing ecosystem degradation, fragmentation, and loss. There should be dedicated targets for these issues.

We welcome the efforts of the CBD Secretariat, the Informal Advisory Group on Mainstreaming of Biodiversity, and the network of experts to develop a Long Term Approach to Mainstreaming (LTAM). The LTAM, in Annex II to the proposed CoP15 decision, as well as the draft action plan in SBI/3/11/ADD1,

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does contain a useful elaboration of activities that could underpin draft GBF Targets (e.g. 13, 14, 15, 17). However, we note that these documents are not yet fully aligned with the updated zero draft, and indeed both are subject to further amendment by Parties. The linkages to targets beyond those mentioned above (e.g. draft Target 1 on spatial planning and ecosystem conservation/restoration) are also not clear.

As such, we recommend that Parties focus on the negotiation of the GBF through CoP15, and adopt only, if necessary, high-level elements of the LTAM at CoP15. Any LTAM should be designed explicitly to support the implementation of a group of post-2020 targets related to mainstreaming – including those related to forestry, fisheries and other sectors not currently addressed – and further work should be carried out by the IAG and consultative network to refine the LTAM and any associated action plan for discussion and adoption at CoP16.