

## [WCS recommendations on Draft 1 of the Global Biodiversity Framework \(July 2021\)](#)

### **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 125 years to save wildlife and wild places. We have conservation 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.

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### **Recommendations for Parties on Draft 1 of the GBF**

#### ***Overall impressions and general concerns***

WCS commends the Co-Chairs of the Open-Ended Working Group (OEWG) on the Post-2020 Global Biodiversity Framework (GBF), the Secretariat of the Convention on Biological Diversity (CBD), and other stakeholders for providing an updated [“Draft 1” of the post-2020 GBF](#). The recommendations in this document are intended to help CBD Parties and other OEWG participants refine this draft framework for final consideration at the 15<sup>th</sup> meeting of the Conference of the Parties (CoP15).

Generally, WCS supports the proposed structure of the GBF in Draft 1, with outcome-oriented goals for the state of biodiversity and action-oriented targets that measure interventions for conservation, sustainable use, and sharing of benefits. Furthermore, we welcome the enhanced role for Indigenous Peoples and local communities (IPLCs), as well as holders of traditional knowledge, as critical leaders in biodiversity conservation.

However, we believe changes are still required to achieve sufficient ambition in the GBF, including meeting or exceeding previous political commitments such as the [Leaders’ Pledge for Nature](#), the [G7 Nature Compact](#), and other statements endorsed by CBD Party governments, for example, through the [New York Declaration on Forests](#) or [recommendations of the International Coral Reef Initiative](#). One key change is amending the 2030 Mission to explicitly call for reversing biodiversity loss, to be complemented by action targets to halt human-induced extinctions and to prevent the loss, fragmentation and degradation of ecosystems. In addition, the post-2020 GBF must:

- **Identify ecosystems in need of urgent attention:** Goals and targets should be relevant for every CBD Party. However, we remain concerned that such generalized goals and targets will eliminate references in the Aichi Targets to particular critical and highly threatened ecosystems. Coral reefs, for example, face a dire outlook under current climate change projections, yet they are losing the attention of Aichi Target 10. Tropical forests provide habitat for many species and are a key nature-based solution to climate change, yet receive no specific attention as they did under Aichi Target 5. These ecosystems, together with others like grasslands, peatlands, and productive coasts, have within them high-integrity strongholds for biodiversity and biomass, as well as carbon, that will play key roles in addressing biodiversity loss and climate change. It is therefore important to draw attention to such categories of ecosystems, as delineated through the [IUCN ecosystem typology](#)

(ideally at the level of ecosystem functional groups to avoid miscounting) through appropriate changes to goals/targets and the monitoring framework.

- **Change business-as-usual for a truly green recovery:** The COVID-19 global pandemic continues to cause extraordinary suffering and affect the lives of billions of people around the world. As the Leaders' Pledge for Nature commits its endorsers to a green and just recovery, the post-2020 GBF must require or encourage significant changes to "business-as-usual" to ensure a just, sustainable recovery and to prevent the next pandemic of zoonotic origin. This requires targets to, for example, increase the focus on equitable conservation approaches that recognize and support Indigenous-led conservation, and to make changes to exploitation, trade, and consumption policies that threaten the planet's remaining intact ecosystems, as well as human and environmental health and wellbeing. Targets must effectively address the drivers of biodiversity loss to reverse biodiversity decline and achieve net gain rather than just mitigation efforts that, at best, stabilize a rate of loss.

Finally, we agree that the monitoring framework is a critical part of the post-2020 GBF, not least because it will provide clarity for Parties on how to report on progress against goals and targets. A robust, clear set of indicators will strengthen these draft goals and targets, but weak or imprecise indicators will hinder implementation and reviews of progress. WCS has significant concerns with some of the headline indicators presented in [WG2020/3/3/ADD1](#) (see comments in boxes below). We are also concerned by the potential minimization of key indicators that may fall into the component and complementary categories. We urge Parties to ensure that there is sufficient time to discuss the monitoring framework during the virtual sessions of the Open-Ended Working Group, and that an updated version of the full monitoring framework is prepared for any in-person session.

### **2030 Mission (Paragraph 10)**

WCS joins many partner organizations in recommending that Parties adopt a 2030 Mission aiming for a 'nature-positive' world that practically results in a net gain in the status of biodiversity and nature's contributions to people by 2030 (Locke et al. [2021](#)).

To this point, we are concerned about footnote 8, which states that putting biodiversity on a path to recovery "implies the need for a stabilization in the rate of loss of biodiversity." Parties should be aiming to halt and reverse the loss of biodiversity rather than to stabilize the rate of loss that will continue to threaten biodiversity and our own wellbeing.

We therefore propose the amendments presented below to the draft Mission Statement in paragraph 10. Proposed amendments (additions and ~~deletions~~) are in red:

*10. The mission of the framework for the period up to 2030, towards the 2050 vision is: "To take urgent action across society in order to ~~conserve and sustainably use biodiversity and ensure the fair and equitable sharing of benefits from the use of genetics resources to reverse biodiversity loss and~~ put biodiversity on a path to recovery, achieving a nature-positive world by 2030 for the benefit of planet and all people."*

***Clean version:** The mission of the framework for the period up to 2030, towards the 2050 vision is: "To take urgent action across society in order to reverse biodiversity loss and put biodiversity on a path to recovery, achieving a nature-positive world by 2030 for the benefit of planet and all people."*

### **2050 Goals & 2030 Milestones (Paragraph 11)**

WCS generally supports the scope and intent of the proposed 2050 Goals and their 2030 Milestones, which we believe address the Convention's three objectives and which would enable reviews of implementation at various scales.

We address below Goal A and its milestones, in paragraph 11 of Draft 1. This is an area where WCS has specific expertise and associated technical advice, as well as recommended amendments. We would also be glad to discuss the other Goals and Milestones with Parties and Observers.

- **Goal A, on conservation and restoration of biodiversity:**

WCS welcomes many of the elements currently included in Goal A, which we understand is intended to be comprehensive. We would, however, support interventions made by Parties during the virtual sessions of SBSTTA-24 that **there is merit in separating the ecosystem components of this goal from the species and genetic diversity components**. This would have the effect of reducing complexity and enhancing clarity within the Goal and its Milestones, as well as the monitoring framework. We would be glad to discuss how to separate these components with Parties.

Regarding the specific components of Goal A, **we strongly support the proposed focus on enhancing the integrity of all ecosystems, and a 2030 milestone for a net gain in both area - we would recommend replacing this with "extent" - and integrity of natural ecosystems**. Ecosystem integrity, which refers to the composition, structure, and function of an ecosystem in relation to its natural state (or natural range of variability) and ability to deliver expected ecosystem functionality, is reflected well in the introduction to Goal A. It is important to not conflate extent with integrity, or subordinate one to the other, and continue distinction and attention to both is needed in the goals, targets, and monitoring framework. **WCS updated a Frequently Asked Questions document on ecosystem integrity for OEWG-3, which will be available [here](#) in advance of the meeting.**

WCS also supports the proposed use of the term "net" with respect to the 2030 Milestone on area/extent, integrity and connectivity of ecosystems, and we recommend using the term "net gain" instead of specific percentage increases (which will vary widely in terms of feasibility across ecosystem types). We note that net gain will require the recovery of nature, and we welcome the addition of a restoration target in Draft 1 (see below).

However, we generally urge Parties to ensure that this framework does not encourage achievement of such net gain by allowing the unlimited reduction of area and integrity in an ecosystem compensated by a commitment to restore other areas. Where losses are to be compensated by gains elsewhere, those losses should be as limited as possible, and must avoid the most critical areas for biodiversity altogether. Any compensation efforts must also be linked geographically/ecologically with those areas subject to loss.

**In order to achieve a goal for true net gain at a global scale, it is essential to prioritize the retention of high integrity ecosystems, or highly intact ecosystems, as addressed by Target 1.** Goal A is not achievable at a global scale without the retention of these ecosystems, and restoration and recovery efforts, when feasible, around them. Some biodiversity values cannot be restored, so are 'un-nettable.' We therefore recommend that the definition of 'net gain' provided in [CBD/WG2020/3/3/Add.2](#) further specify that in addition to the sequential implementation of the mitigation hierarchy, an emphasis on

avoidance of negative impacts on biodiversity is essential to achieve net gain globally.

With respect to the components of this goal addressing conservation of species, we urge Parties to ensure that this meets or exceeds the ambition of Aichi Target 12. **We urge Parties to make a commitment to halt human-induced species extinctions by 2030.** We think a rate-based target is not suitable, as we know from experience that it can be easily manipulated.

We welcome the Goal's additional focus on 'keeping common species common' through increases in population abundance. However, it is also important that the proposed goals and milestones for increases in population abundance and maintenance of genetic diversity be clearly articulated to not apply to invasive species, or those that thrive primarily in degraded habitat, and they avoid giving credit for other perverse outcomes such as increased abundance of species at lower trophic levels following over-exploitation at higher trophic levels. This must be seen in the context of ecological integrity, and not only species' population abundances.

Generally, we propose more general language at the 2050 Goal level and more specific, quantitative Milestones for 2030; we believe that it is more feasible and practical to set measurable goals for 2030 than 2050 and that this will increase attention on our near-term objectives. It will also reduce the complexity of the GBF.

We therefore propose the amendments presented below to Goal A. Proposed amendments (additions and deletions) are in **red**, and existing text we support is in **green**:

*The integrity of all ecosystems is enhanced, with an increase of at least 15 per cent including increases in the area, extent, integrity, and connectivity and integrity of natural ecosystems; species extinctions are prevented and healthy and, resilient and ecologically functional populations of all native species are supported; and the genetic diversity of all species is safeguarded, with at least a tenfold reduction in the rate of extinctions and the rate of extinctions has been reduced at least tenfold, and the risk of species extinctions across all taxonomic and functional groups, is halved, and genetic diversity of wild and domesticated species is safeguarded, with at least 90 per cent of genetic diversity within all species maintained.*

- Milestone A.1: *A net gain in the extent, integrity, and connectivity of natural ecosystems, including a reversal in the decline of highly intact or highly vulnerable ecosystems, of at least 5 per cent.*
- Milestone A.2: *The increase in the extinction rate is halted or reversed, Human-induced species extinctions are halted and the overall extinction risk is reduced by at least 10 20 per cent, with a decrease in the proportion of species that are threatened, and the average population abundance and distribution of populations of native species across all trophic levels is enhanced or at least maintained increased on average by 20 percent.*
- Milestone A.3: *Genetic diversity of wild and domesticated species is safeguarded, with an An increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.*

**Clean version:** *The integrity of all ecosystems is enhanced, including increases in the extent, integrity, and connectivity of natural ecosystems; species extinctions are prevented and healthy, resilient, and ecologically functional populations of all native*

*species are supported; and the genetic diversity of all species is safeguarded.*

- *Milestone A.1: A net gain in the extent, integrity, and connectivity of natural ecosystems, including a reversal in the decline of highly intact or highly vulnerable ecosystems.*
- *Milestone A.2: Human-induced species extinctions are halted and the overall extinction risk is reduced by at least 20 per cent, and the average population abundance and distribution of native species across all trophic levels is increased on average by 20 percent.*
- *Milestone A.3: An increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.*

#### **Headline indicators for Goal A:**

WCS remains significantly concerned that headline indicators for Goal A focus on ecosystem extent at the expense of integrity. This presents significant issues, including the fact that marine ecosystems are not always evaluated by their extent. Furthermore, the Species Habitat Index (A.0.4) does not sufficiently evaluate ecosystem integrity broadly, and does not address all species, such as marine species, and lacks peer review as noted in Party responses to the survey on headline indicators ([SBSTTA/24/INF/29](#)) Other tools (such as the Ocean Health Index) do not account for composition, structure *and* function of ecosystems.

One way to address this is by looking at globally relevant tools to evaluate the relative integrity, or intactness, of ecosystems, such as the Biodiversity Indicators Partnership (BIP)-approved [Ecosystem Intactness Index \(EII\)](#) [note: in draft monitoring framework as a.23], which measures the relative integrity of natural terrestrial ecosystems by using global datasets on anthropogenic pressures that cause a loss in area and/or quality of terrestrial ecosystems. This can be complemented with sub-global datasets, where appropriate, and by other measures in the marine realm. Alternatively, a placeholder headline indicator on ecosystem integrity should be adopted and a methodology, drawing on existing tools, refined by the ad hoc Technical Expert Group.

As another alternative, based on the existing draft monitoring framework, we could recommend amending A.0.1 to refer to the “Extent *and integrity* of selected *natural and modified* ecosystems (i.e. forests, savannahs and grasslands, wetlands, peatlands, mangroves, saltmarshes, coral reefs, seagrass, macroalgae and intertidal habitats).” Some examples of appropriate indicators include:

- The [Forest Landscape Integrity Index \(FLII\)](#) is the first cumulative, spatially-explicit index that integrates data on a) forest extent, b) localized, directly observable anthropogenic pressures, c) diffuse, anthropogenic pressures inferred based on proximity to localized pressures, and d) anthropogenic alteration of forest connectivity. The index can be scaled to jurisdictional or ecologically relevant boundaries, incorporate other relevant data, and is available at no cost to Parties for reporting.
- “Cover of live [hard] coral and other key benthic groups,” as proposed by the International Coral Reef Initiative and Parties in response to the survey on headline indicators during SBSTTA-24. This would take advantage of existing efforts at the national scale by CBD Parties as well as by the Global Coral Reef Monitoring Network (GCRMN) to support Parties in reporting on coral reef ecosystems around the world, and would effectively combine [ICRI-recommended indicators](#) a.13, a.14, a.20 and a.21 in the previous draft monitoring framework.

### **2030 Action Targets (Paragraph 12)**

We address below a selection of the 2030 Action Targets, in paragraph 12 of Draft 1, where WCS has significant relevant experience, technical advice and recommended amendments. This includes Targets 1, 2, 3, 4, 5, 7, 8, 14, 18, and 19.

- **Target 1, on spatial planning and intact ecosystems:**

WCS strongly supports Target 1, which focuses on spatial planning and the retention of highly intact ecosystems of all types. As described above, Goal A is not achievable without actions described under Targets 1, 2, and 3 (among others). Target 1 addresses land and sea use change, one of five major direct threats identified in the IPBES Global Assessment

We welcome the changes to this Target, including amendments to address *all* land and sea areas and ensuring that spatial plans are integrated and include biodiversity layers.

We would recommend greater clarity around the final portion of the target dealing with the retention of intact areas. We recommend that the target specify that spatial planning should directly inform policies that halt land and sea use change and retain all highly intact ecosystems. While spatial planning itself is a tool that is necessary, it is of course ultimately insufficient by itself to change the trajectory of loss in intact ecosystems. For that, we need policy change that increases attention to the first stage of the mitigation hierarchy: avoidance. This may warrant a reference to infrastructure, which is not explicitly addressed by Draft 1, although that is not the only cause of land and sea use change.

Finally, we note that “wilderness” as defined in many peer-reviewed studies does not exclude, for example, Indigenous Peoples or their activities. However, we recognize concerns with the term and in this context prefer the phrase “*highly intact ecosystems*.” This also recognizes that intactness and integrity is measured on a continuum or spectrum, and that thresholds for “highly intact” will need to be identified and stated in analyses. Unless carefully defined, use of the term ‘intact ecosystems’ could perhaps lead some stakeholders to the undesirable conclusion that even very slight anthropogenic modification (which in practice is almost ubiquitous) should exclude an area from special attention.

We therefore propose the amendments presented below to Target 1. Proposed amendments (additions and ~~deletions~~) are in **red**, and existing text we support is in **green**:

*Target 1. Ensure that all land and sea areas globally are under **integrated, multi-sectoral, and biodiversity-inclusive** spatial planning **that informs policies** addressing land- and sea-use change, ~~retaining~~ **leading to the retention of all existing highly intact and wilderness areas ecosystems, threatened or vulnerable ecosystems, and other areas critical for the persistence of biodiversity across all ecosystem types.***

***Clean version:** Ensure that all land and sea areas globally are under integrated, multi-sectoral, and biodiversity-inclusive spatial planning that informs policies addressing land- and sea-use change, leading to the retention of all existing highly intact ecosystems, threatened or vulnerable ecosystems, and other areas critical for the persistence of biodiversity across all ecosystem types.*

- **Target 2, on ecosystem restoration:**

WCS welcomes Target 2, which is a new addition focusing on ecosystem restoration.

As presented in Draft 1, we are concerned that the Target should set higher ambition by asking that 20% of degraded ecosystems have been restored, recognizing that full restoration of ecosystem will often take longer than 10 years, and many ecosystems can never be fully restored (which is why we strongly prefer retention and protection). The concern is that nascent restoration programs being launched towards the end of this decade could count towards the 20%, long before any meaningful ecological restoration outcomes have in fact been achieved. Therefore, there must be some internationally agreed and evidence-based threshold against which ecosystems under restoration have met before being counted towards this target.

Furthermore, noting that restoration efforts will be critical to achieve the ecological outcomes presented in Goal A, we urge Parties to amend Target 2 to ensure that restoration efforts contribute to overarching ecosystem integrity and connectivity. To this point, it is essential that restoration efforts focus on natural ecosystems and native species, including native vegetation. At present, international and national policy frameworks do not universally distinguish between natural forest (or other ecosystem) regrowth, reforestation with plantations (often monocultures) and afforestation of land not previously tree-covered. This can lead to negative consequences for biodiversity. As recommended in the report from the IPCC/IPBES workshop, it is critical that this is clarified and monitoring efforts distinguish among these.

We therefore propose the amendments presented below to Target 2. Proposed amendments (additions and ~~deletions~~) are in red, and existing text we support is in green:

*Target 2. Ensure that at least 20 per cent each of degraded freshwater, marine and terrestrial ecosystems have met international standards for successful restoration, ensuring connectivity among them contributing to an overall increase in the abundance and distribution of native species as well as ecosystem integrity and connectivity, and focusing with a focus on those natural priority ecosystems critical for both biodiversity and human wellbeing.*

***Clean version:** Ensure that at least 20 per cent each of degraded freshwater, marine and terrestrial ecosystems have met international standards for successful restoration, contributing to an overall increase in the abundance and distribution of native species as well as ecosystem integrity and connectivity, with a focus on those natural ecosystems critical for both biodiversity and human wellbeing.*

- **Target 3, on area-based conservation measures**

WCS strongly supports Target 3, which presents a robust and evidence-based successor to Aichi Target 11 on area-based conservation measures.

WCS commends continued attention to qualitative aspects of area-based conservation, including the siting of area-based measures in important areas for biodiversity (including, but not limited to, for example, areas recognized as Key Biodiversity Areas), and ensuring that they are effectively and equitably managed, ecologically representative, and well connected.

Furthermore, WCS reiterates our position from SBSTTA-24 that *at least* 30% of global land and sea areas is the minimum amount needed to conserve biodiversity and ecosystem services necessary to deliver on Goals A and B, as well as broader objectives on climate change and sustainable development. We therefore welcome the removal of brackets

around this figure.

Recognizing the implications of terms like ‘protect’ and ‘conserve’, we welcome the change to focusing on ensuring that such areas counting towards Target 3 “are conserved,” implying that ecological outcomes have been delivered. Further to this point, we recommend moving the mention of “effective” from modifying “management” to modifying “conservation.” Measurements of management effectiveness correlate with, but do not necessarily guarantee, that ecological outcomes are being met.

Finally, we propose an insertion to ensure that such areas counting towards this target are regularly monitored (ideally, for both threats and ecological and social outcomes) to better ensure their continued efficacy.

We therefore propose the amendments presented below to Target 3. Proposed amendments (additions and ~~deletions~~) are in red, and existing text we support is in green:

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

***Clean version:** Ensure that at least 30 per cent globally of freshwater, marine and terrestrial ecosystems, especially areas of particular importance for biodiversity and its contributions to people, are effectively conserved through equitably managed, ecologically representative, and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.*

**We recommend at least two headline indicators for draft Target 3:**

1. **One that measures the global area coverage of protected and conserved areas, and their overlap with important areas for biodiversity.** The current headline indicator “3.0.1 Coverage of Protected areas and OECMS (by effectiveness)” does have a disaggregation by key biodiversity area, although it is not clear exactly how reporting will be structured and how other types of important areas (e.g. EBSA) will be considered.
2. **A second headline indicator that addresses effectiveness and ecological outcomes of area-based conservation measures, building on tools such as the “Green List of Protected and Conserved Areas.”** The current headline indicator “3.0.1 Coverage of Protected areas and OECMS (by effectiveness)” does have a disaggregation by effectiveness (PAME), although it is not clear exactly how reporting will be structured. Any PAME-related indicator must be further developed to document more than just whether PAME assessments have taken place. The information from those assessments should be standardized in some way to enable global assessments of the efficacy and impact of area-based conservation measures, including whether they prohibit environmentally damaging activities.



- **Target 4, on species management and recovery**

WCS welcomes Target 4, which addresses proactive management actions to enable species conservation and recovery, thereby contributing directly to Goals and Milestones.

We continue to believe that a target addressing human-wildlife conflict is an important addition to the GBF. However, we would note that extirpation of a species from a given area could effectively reduce human-wildlife conflict. We therefore believe the target should be adjusted to seek co-existence of humans with healthy wildlife populations.

We therefore propose the amendments presented below to Target 4. Proposed amendments (additions and ~~deletions~~) are in **red**, and existing text we support is in **green**:

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

**Clean version:** *Implement active management actions to enable the conservation and recovery of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict while maintaining species populations.*

- **Target 5, on harvesting, trade and use of wild species**

WCS strongly supports the intent of Target 5, which addresses threats posed to biodiversity, ecosystems, and human health and wellbeing from illegal, unsustainable or unsafe exploitation and use of wild species. We believe it requires some further clarification to properly meet a central challenge of the post-2020 GBF: changing business as usual to avoid ecological collapse and the threat of future pandemics of zoonotic origin.

Many international treaties (e.g. CMS, CITES) already require wildlife “harvest,” or alternatively “exploitation” in line with the IPBES Global Assessment, and trade to be legal and sustainable, yet recent decades have seen an exponential increase in overall domestic and international commercial exploitation and trade and an alarming deterioration in the conservation status of a number of commercially-traded wild species. The science is clear that more action is needed at the national and sub-national levels to implement and effectively enforce existing laws and regulations, and treaty obligations.

Furthermore, in the context of the devastating global pandemic we are still experiencing, pathogens, such as the virus that caused the COVID-19 pandemic, do not care about sustainability or legality of individual animals. Biologically sustainable or legal trade threatens human or animal health as much as illegal or unsustainable trade (and sometimes is an even greater threat). Although the clarification of the word ‘safe’ as referring to human health is welcome, it will be challenging to define appropriate thresholds of risk. Considering the devastation and suffering caused by COVID-19, we consider it irresponsible not to strive to eliminate all risk. Recognizing the toll of the COVID-19 pandemic, and that another such pandemic could be even worse, we suggest defining it as “posing no risk of pathogen spillover” in line with precautionary, science-based approaches.

We therefore strongly urge Parties to ensure that Target 5, as one of the targets intended to reduce threats to biodiversity, clearly states that no exploitation of wildlife (plants and animals) should be allowed unless it is demonstrably legal, sustainable, well managed, effectively enforced, and presents no risk to human or animal health.

Finally, we heard some Parties ask to combine Targets 4 and 8 in the updated zero draft -- now Targets 5 and 9 -- but argue strenuously that this is not workable from a scientific or technical perspective. We appreciate that these two targets have not been merged in this draft. Target 5 is about threats to biodiversity, including humans, from the exploitation, use, and trade in wild species, to deliver on Goal A. Target 9 is about sustainable, long-term benefits to people (nutrition, livelihoods, etc.) from sustainable offtake of wild species. While they are related, implementing and measuring success will require entirely different activities and indicators, respectively and we believe it is risky to conflate these issues.

We therefore propose the alternative formulation of Target 5:

***Target 5. ~~Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health~~ Ensure that the exploitation, trade and use of wild species is legal, sustainable, effectively regulated and enforced, and poses no risk of pathogen spillover to humans, wildlife, or other animals.***

***Clean version: Ensure that the exploitation, trade and use of wild species legal, sustainable, effectively regulated and enforced, and poses no risk of pathogen spillover to humans, wildlife, or other animals.***

**We recommend three headline indicators for Target 5:**

1. **One indicator to evaluate whether illegal exploitation and trade (domestic and international) are eliminated.** We recommend building on proposed headline indicator 4.0.1, ensuring that the methodology covers marine species and goes beyond existing data on legal and illegal international trade with known limitations.
2. **One indicator to evaluate whether legal exploitation and trade (domestic and international) are biologically sustainable.** We recommend using IUCN Red List assessments of the conservation status and trends for species that are exploited commercially, including but not limited to those in international trade, or included on either the CMS or CITES Appendices.
3. **One indicator to evaluate whether and the extent to which exploitation and trade (domestic and international) that presents a risk to human or animal health is eliminated.** We recommend that Parties report on the adoption of legislation or regulation to prohibit domestic and international trade and markets in certain taxa, particularly birds and mammals, that present high risk for pathogen spillover.

- **Target 7, on pollution**

WCS welcomes Target 7, which addresses pollution from all sources that affects biodiversity, ecosystem function, and human health.

WCS acknowledges the historical focus on issues of excess nutrients, pesticides, and plastic,

but we strongly encourage a reference to the need for more ambitious action on light and noise pollution, particularly underwater anthropogenic noise. There is increasing appreciation of the considerable impacts of this type of pollution on so many terrestrial and aquatic species – these types of pollution are also excellent indicators of degradation of intact ecosystems.

We therefore propose the amendments presented below to Target 7. Proposed amendments (additions and ~~deletions~~) are in **red**, and existing text we support is in **green**:

**Target 7.** *Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, ~~and~~ pesticide use by at least two thirds, taking steps to minimize risks from noise and light pollution, and eliminating the discharge of plastic waste.*

**Clean version:** *Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, pesticide use by at least two thirds, taking steps to minimize risks from noise and light pollution, and eliminating the discharge of plastic waste.*

- **Target 8, on climate change**

WCS strongly supports Target 8, on mitigating the impacts of climate change on biodiversity, while simultaneously maximizing the contribution of biodiversity and nature to climate change mitigation *and* adaptation. Maintaining the carbon sink capacity of our lands and waters is becoming increasingly recognized as essential for addressing climate change; without this, cuts to greenhouse gas emissions will have to be considerably deeper and faster.

WCS welcomes the quantitative element of this target being measured in tons of carbon dioxide equivalent, rather than a percentage of mitigation effort needed. This is more agnostic to activities undertaken outside of the mandate of the CBD, and is more measurable for Parties at national and global scales and can inform nationally determined contributions under the Paris Agreement.

However, we urge Parties to pay attention to the mitigation *and* adaptation benefits of natural ecosystems in the implementation of this target. The quantitative element and headline indicator refer only to mitigation potential of nature for climate change mitigation; however, ecosystem-based approaches to climate change adaptation has already been recognized by CBD Parties and should appear prominently in this target.

Finally, WCS recommends the re-insertion of the term “nature-based solutions,” as defined by IUCN and articulated through IUCN and other guidance (Seddon et al. [2020](#)). We believe this is a critical term that has broad political resonance, and that IUCN’s guidance on these issues represents broad technical consensus. In line with this definition and guidance, we have proposed a change to this target to explicitly seek positive co-benefits for biodiversity from nature-based solutions to climate change.

We therefore propose the amendments presented below to Target 8. Proposed amendments (additions and ~~deletions~~) are in **red**, and existing text we support is in **green**:

**Target 8.** *Minimize the impact of climate change on biodiversity, ~~contribute to by maximizing the contribution of biodiversity-positive, nature-based solutions to climate change mitigation, ecosystem-based approaches, contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, including through enhanced conservation of sinks and reservoirs for greenhouse gases, and by safeguarding and promoting critical ecosystem-based approaches for adaptation.~~ and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.*

**Clean version:** *Minimize the impact of climate change on biodiversity by maximizing the contribution of biodiversity-positive, nature-based solutions to climate change mitigation, contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, including through enhanced conservation of sinks and reservoirs for greenhouse gases, and by safeguarding and promoting critical ecosystem-based approaches for adaptation.*

- **Target 14, on integrating biodiversity values into planning and policies**

WCS strongly supports Target 14, on integrating biodiversity into planning and policies at all levels and across all sectors need to mention whole-of-government, trans-sectoral approach that integrates and aligns the work of different ministries, agencies, etc. This is consistent with statements of CBD Parties on issues related to mainstreaming (Ray et al. [2021](#)).

We particularly welcome the reference to assessments of environmental impacts, which should encompass impact assessments for specific projects, but even more strongly strategic and regional environmental assessments for broader programs and policies. Assessment at relevant scales of cumulative impacts is essential to successfully avoid negative impacts to biodiversity – the first step in the mitigation hierarchy.

Further to this point, the full mitigation hierarchy must be more clearly referenced in this target so that responses are not limited to remedial efforts such as offsets, as is often the case. We know from multilateral discussions around, for example, addressing the impacts of linear infrastructure by Parties to CMS, that there are few means of formalizing reporting around initial steps in the mitigation hierarchy, particularly the avoidance of impacts to biodiversity through more effective planning. Target 14 in Draft 1 is the logical place to ensure that there is a reference to the hierarchy that prioritizes the avoidance of impacts.

Finally, we encourage two additional edits: one to specify the need to ensure that both development assistance and foreign investment take biodiversity fully into account, and secondly, to specify that “aligning with biodiversity values” really means projects are undertaken in such a way that they contribute to the shared biodiversity goals of the GBF and other frameworks.

We therefore propose the amendments presented below to Target 14. Proposed amendments (additions and ~~deletions~~) are in red, and existing text we support is in green:

**Target 14.** *Fully integrate biodiversity values into policies, regulations, ~~planning, development processes, plans, foreign aid and investment,~~ poverty reduction strategies, accounts, and ~~assessments of environmental impacts, including strategic and regional environmental assessments,~~ at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows follow the mitigation*

~~hierarchy and~~ are aligned with ~~biodiversity values shared goals for biodiversity.~~

***Clean version:** Fully integrate biodiversity values into policies, regulations, development plans, foreign aid and investment, poverty reduction strategies, accounts, and assessments of environmental impacts, including strategic and regional environmental assessments, at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows follow the mitigation hierarchy and are aligned with shared goals for biodiversity.*

- **Target 18, on eliminating harmful incentives**

WCS strongly supports Target 18, which addresses the redirection, repurposing, reformation or elimination of incentives and subsidies that create perverse incentives for extractive and other activities that degrade ecosystems and are otherwise harmful for biodiversity. We appreciate that this addresses both economic and regulatory incentives.

We note the reference to the “most harmful subsidies,” but note with concern that this can be subjective and challenging to define. Rather than a hierarchy, Parties should seek to eliminate *all* subsidies that are identified as harmful for biodiversity (with appropriate exceptions related to food insecure communities on a case-by-case basis). Furthermore, while we recognize that current harmful incentives can be altered to be biodiversity positive, we are concerned that the language as presented in the target is not clear enough about the urgent need to eliminate harmful incentives.

While we support evidence-based quantification that will make this (or any) target measurable, we have concerns that the US\$ 500 billion that is cited is an incomplete figure, which may not include, for example, certain fossil fuel subsidies with negative impacts on biodiversity. This dollar amount is therefore a conservative estimate. Furthermore, dollar figures will change over time and therefore may not be relevant by 2030. We therefore suggest bracketing this figure and recommend that Parties explore possible percentage-based alternatives that achieve similar or greater ambition but avoid becoming outdated.

We therefore propose the amendments presented below to Target 18. Proposed amendments (additions and ~~deletions~~) are in red, and existing text we support is in green.

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

***Clean version:** Eliminate or redirect all incentives harmful for biodiversity, in a just and equitable way, reducing them by at least [X%] per year globally, and ensure that all incentives, including public and private economic and regulatory incentives, are positive for biodiversity.*

- **Target 19, on financial resources**

WCS strongly supports Target 19, which addresses the need to increase financial resources for implementation of the Convention and the post-2020 GBF.

It should be specified that the financial resources must be available for the implementation of this framework specifically, rather than any biodiversity-relevant expenditures. Financial

flows related to biodiversity (for example, fisheries) that are not compliant with the objectives of the post-2020 GBF must not be counted towards this target.

As in Target 18, we are concerned that specific dollar amounts/figures will change over time and therefore may not be relevant by 2030. We therefore suggest bracketing this figure and recommend that Parties explore possible percentage-based alternatives that achieve similar or greater ambition but avoid becoming outdated.

Additional edits are presented below for the purpose of increasing clarity.

We therefore propose the amendments presented below to Target 19. Proposed amendments (additions and ~~deletions~~) are in red, and existing text we support is in green.

**Target 19.** Increase *the financial resources available for implementation of this framework from all sources, including new, additional, and effective resources from domestic and international sources, to at least US\$ 200 billion [X%] per year, increasing by including an increase of at least US\$ 10 billion [X%] per year international financial flows to developing countries, taking into account leveraging private finance, and increasing domestic resource mobilization, taking into account the need to leverage private finance, support national biodiversity finance planning, and strengthen capacity-building.*

**Clean version:** Increase the financial resources available for implementation of this framework from all sources, including new, additional, and effective resources from domestic and international sources, to at least [X%] per year, including an increase of at least [X%] per year international financial flows to developing countries, taking into account the need to leverage private finance, support national biodiversity finance planning, and strengthen capacity-building.

### **Implementation and Support Mechanisms (Section H)**

- **Paragraph 13:**

WCS strongly supports resource mobilization as a critical component of the post-2020 framework. We note that paragraph 13 of Draft 1 mentions a strategy on resource mobilization but is generally less specific than the updated zero draft. We believe this is appropriate, and it is preferable for key elements of a resource mobilization package (e.g. reduction in harmful expenditures, increases in international flows to developing countries, and the importance of national biodiversity finance plans) to be captured in the 2030 Action Targets. This appears to be the case at present, although there is more flexibility (for example, national biodiversity finance planning is mentioned but not required).

### **Enabling Conditions (Section I)**

- **Paragraph 17:**

We note with concern that key concepts previously outlined in the section on enabling conditions in the updated zero draft, such as the principle of intergenerational equity, the need to recognize IPLC rights in the implementation of the entire framework, and multi-stakeholder platforms to enable the participation of all relevant stakeholders in the implementation of the GBF have disappeared. Although certain concepts, such as the need

to recognize Indigenous Peoples' rights have been incorporated into the GBF in other places, we call attention to the concepts that were lost in the streamlining of this section.

### **Draft elements of a possible decision for CBD CoP15 (Appendix)**

WCS generally welcomes the draft decision that will operationalize the post-2020 GBF.

We propose one minor amendment in operative paragraph 14 to ensure that guidance is developed, including in partnership with relevant intergovernmental treaties and processes, on how to implement the full suite of targets for specific ecosystem types. With dense and highly generalized targets, and potentially a wide variety of headline, component and complementary indicators, it is essential that every effort is made to provide concrete guidance where possible to enhance implementation.

We therefore propose the amendments presented below to operative paragraph 14. Proposed amendments (additions and ~~deletions~~) are in red.

*14. Requests the Executive Secretary:*

...

*(c) To develop including in partnership with relevant agreements, processes and organizations, guidance materials, including ~~the identification of possible actions~~ guidance for operationalizing the goals and targets and other elements of the post-2020 global biodiversity framework for specific ecosystem types.*

Finally, we also recommend that the draft decision invites the UN General Assembly to acknowledge the adoption of this framework, and for UN Member States to update biodiversity-related SDG Targets, particularly but not exclusively those with an end date of 2020, in accordance with the post-2020 GBF.