

Response of [The Nature Conservancy](#) on the
Zero Draft of Global Biodiversity Framework

February 3, 2020

Key Messages

- The Nature Conservancy strongly supports the inclusion of a target on **no net loss (net gain) of ecosystem integrity** (Target 1 of Zero Draft). We propose some [clarifications](#) for the target below. Overall, the draft targets on reducing threats to biodiversity (targets 1-5) are good.
- Several of the benefit-sharing targets seem to call for increased harvest of biodiversity resources to support human well-being. The emphasis of these targets needs to be redirected toward **reinforcing biodiversity as a means to improve long-term security and resilience of food, climate and health** systems.
- The importance of **sector-based targets** is referenced at several points in the document, but no attempt has been made to formulate any such targets. While this could be considered part of the mainstreaming agenda, it should also be part of the action targets for reducing threats to biodiversity. **Specific action targets for agriculture, infrastructure and urban growth are necessary to address the principal drivers of biodiversity loss.**
- We encourage parties to propose language on the crucial elements of **implementation mechanisms** and **resource mobilization** by OEWG-2, and we provide some suggestions on these elements below.

Recommendations: Reducing Threats to Biodiversity

Ecosystems (goal in paragraph 10(a) and target in 12(a)(1)):

We strongly support the inclusion of the concept of **no net loss of ecosystem integrity** in goal 1 of and target 1 of the framework. The implementation of the Sustainable Development Goals (SDGs) will require massive investments in infrastructure and agriculture to transform our energy, food, cities and transportation systems. These investments will place enormous pressures on natural ecosystems, resulting in some inevitable losses. Addressing these pressures will require spatial planning to identify highest value biodiversity areas that would be off-limits to development, and rigorous management of development across the remainder of land and sea through minimization of impacts, along with restoration of degraded areas to improve the integrity of areas most important for biodiversity. A “net” framing allows a realistic appraisal of development pressures and can result in overall gains if appropriate safeguards are applied.

We therefore recommend the goal be strengthened by using a more positive formulation of “**net gain**” to emphasize the positive investments that can drive improvements in ecosystem extent, quality and integrity. The target also requires a reference year to be clear on the baseline.

Accordingly, we recommend the following revisions to the text in paras 10a and 12a:

10a. By 2030, achieve net gain in the area and integrity of all freshwater, marine and terrestrial ecosystems against a 2020 baseline, and no loss in ecosystems with high biodiversity and high ecological integrity, and by 2050 achieve net gain in all ecosystems of at least [20%].

12(a)(1) Ensure that 100% of land, freshwater and sea areas are under comprehensive, multi-sectoral and biodiversity-inclusive spatial plans and policies that prioritize the retention of existing intact freshwater, marine and terrestrial ecosystems, achieving by 2030 a net gain in area and integrity of all ecosystems through restoration [and retention of existing intact areas].

Area-based conservation measures (paragraph 12(a)(2)):

TNC supports increasing the extent of protected areas and OECMs, particularly through the encouragement and support for the role of indigenous people and communities in managing their lands and waters to maintain biodiversity values. However, TNC believes the draft target, as currently worded, omits crucial qualifiers that were present in Aichi Target 11.

In particular, it is essential that the protection target address ecological representativeness, including to ensure protections for especially rare or endangered ecosystems, and connectivity. TNC has developed the Mean Target Achievement (MTA) metric as an indicator of representativeness for terrestrial ecosystems.¹ This indicator can be used with the new World Ecosystem map that allows for a more accurate and refined analysis of representation.²

Further, the requirement that 10% be under ‘strict protection’ in the draft text is undefined and implies backsliding from the current target of 17% terrestrial protected areas. We note the current target has been largely fulfilled by formal protected areas (OECMs having been defined only recently), and therefore the 10% sub-target represents less than what has in many cases already been achieved. All areas under the target should be managed to achieve meaningful, long-term conservation outcomes. Given that OECMs are largely untested, more than half of all areas under protection under this target should be formal, legally protected areas. The rights of indigenous peoples should be specified in the text of the target as well.

We therefore recommend retaining the formulation of and updating the Aichi text:

By 2030, at least 30 per cent of terrestrial and inland water, and 30 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services,

¹ Jantke, K, Kuempel, CD, McGowan, J, Chauvenet, ALM, Possingham, HP. Metrics for evaluating representation target achievement in protected area networks. *DiversDistrib.* 2019; 25: 170– 175. <https://doi.org/10.1111/ddi.12853>

² Sayre, R., Karagulle, D., Frye, C., Boucher, T., Wolff, N.H., Breyer, S., Wright, D., Martin, M., Butler, K., Van Graafeiland, K., Touval, J., Sotomayor, L., McGowan, J., Game, E.T., Possingham, H., An assessment of the representation of ecosystems in global protected areas using new maps of World Climate Regions and World Ecosystems, *Global Ecology and Conservation* (2020), doi: <https://doi.org/10.1016/j.gecco.2019.e008>

are 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. Protections must be established and maintained in full partnership with indigenous peoples and local communities, whose rights must be recognized and who must be given free, prior and informed consent in the inclusion of their territories in support of the target.

Contribution to climate mitigation and adaptation (paragraph 12(a)(6):

Nature-based solutions for climate mitigation and adaptation should be a key target for the new Global Biodiversity Framework and TNC welcomes the target in 12(a)(6). We note there is growing consensus around a figure of 10–11 gigatons CO₂e as a target for nature-based climate solutions.³

Recommendations: Meeting people’s needs through sustainable use and benefit-sharing

We recognize the sustainable use [12(b)] and mainstreaming [12(c)] sections are still largely placeholders, but we have concerns with the limited language in the Zero Draft:

- Targets 7 and 8 and the accompanying indicator framework for them are worded in such a way as to imply increasing harvest/use of wild species, which we feel is rarely an option given the high harvest pressure that already exists. These targets should be flipped to focus on improved conservation status for harvested wild species, which would in turn allow for higher offtake (and more benefits) over time. The CBD should not try to replicate the SDGs, but rather measure and support the biodiversity prerequisites for their attainment.
- As a leader in the development of water funds as a tool for source water protection, TNC welcomes Draft Target 9 on nature-based solutions for water provisioning. We note that this might be expanded to incentivize the protection of other ecosystem types, such as coral reefs and coastal ecosystems, in support of climate risk protection and resilience.

Recommendations: Tools and solutions for implementation and Mainstreaming

- This section is an assortment of issues that are neither action targets nor transformative and are sometimes weaker than in the Aichi framework (for example, draft target 12 on subsidies). We recommend financial issues be consolidated into one section, and that this section focus on mainstreaming actions.
- The chairs’ note in the preface to the Zero Draft identifies a key need/challenge as “Mainstreaming biodiversity across all sectors of society **with a focus on engaging those sectors that will be responsible for implementing actions** to address the drivers of biodiversity loss.” TNC shares the view that effective mainstreaming requires accountable action targets for government policies related to sectors that are responsible for the drivers of biodiversity loss. Sectors most important to address include: agriculture, infrastructure (including energy and extractives-related infrastructure), fisheries, forestry,

³ Griscom BW, Adams J, Ellis PW, et al. Natural climate solutions. Proceedings of the National Academy of Sciences. 2017;114(44):11645-11650. doi:10.1073/pnas.1710465114.

and urban growth. These could be in a distinct mainstreaming section, but could also fit logically under “Reducing threats” (12a).

- Targets on public education (17 and 18) and participation (18 and 19), social norms (20) would be better placed in Section (F) “Enabling Conditions.”

Recommendations: Implementation, Resource Mobilization, and Transparency/Accountability (Sections E, F, G, H)

Resource mobilization and biodiversity (Paras. 12(c)(13) and 13(a)):

The section on implementation support mechanisms (E) should include those financial and economic policies and mechanisms, reflecting both private and public sector sources, that can close the gap on finance and capacity. This includes enacting new country and global fiscal policies, mechanisms and incentives to produce greater sources of funding available to cover the costs of biodiversity restoration and protection; and taking economic measures to reduce or eliminate harmful subsidies or investments that would substantially reduce the need for future conservation funding. Accordingly, targets 12(c) 12 and 12(c) 15 should be consolidated into a single section on resource mobilization and implementation support mechanisms.

Each Party will need to develop biodiversity resource mobilization strategies that address opportunities to mobilize resources at all levels – local, national and global – as well as from all sources – public, private, international and philanthropic. The key responsibility rests with the Parties to design the strategies and put in place the policies, enabling conditions necessary to mobilize resources at all levels and from all sources. There are existing methodologies to provide guidance for how countries can do this, e.g. BIOFIN.

The target for resource mobilization should therefore be framed around national financial needs for biodiversity:

- *100% of Parties develop **National Biodiversity Resource Mobilization Strategies**; and*
- *Each Party mobilizes 100% of the necessary resources identified in their **National Biodiversity Resource Mobilization Strategy** to fully and effectively implement their NBSAPs.*

The indicator for this target would be the percentage of their annual financing gap that each country is achieving, measured on a percentage and absolute basis.

We would further like to recommend the following targets for Resource Mobilization:

- *Financial flows to investments that generate measurable and auditable increases in the status of biodiversity increase globally by an order of magnitude by 2030, and*
- *International funding for capacity building and enabling conditions for implementation of Parties’ National Biodiversity Resource Mobilization Strategies at least doubles by 2030.*

Section E on implementation support mechanisms should include resources and support mechanisms explicitly to promote the role and ability of indigenous people to sustainably manage and conserve their territories.

Transparent implementation, monitoring, reporting and review (Section G, paragraph 16)

TNC strongly supports the apparent move to include indicators as essential components of the framework, as described in CBD/WG2020/2/3/add.1. We believe simultaneous adoption of a defined and available set of indicators will help parties and the Convention with implementation, monitoring and review. TNC recommends review mechanisms using these indicators be strengthened by:

- **Alignment of Reports:** National Reports need to be linked to NBSAPs, and NBSAPs need to be linked to the commitments. National Reports should reflect progress vis-à-vis both NBSAPs and allow for aggregation to measure progress toward global targets.
- **Transparency at national level:** In order to improve the accuracy and accountability of national reports, countries should provide for domestic public engagement processes to allow input from a range of actors and observers, especially including indigenous and local communities, prior to the reports' submission.
- **Aggregation of progress/actions:** SBI should establish a formal review mechanism that evaluates aggregate progress as described in the national reports against the Action Targets.