

**ANIMAL PROTECTION  
DENMARK**



Animal Welfare.  
Worldwide.



## Position paper on Draft 1.0 the post-2020 Global Biodiversity Framework

August 2021

### Key recommendations for an ambitious, effective and transformative post-2020 Global Biodiversity Framework ('GBF')

About us: The World Federation for Animals advocates for animal issues at the United Nations. This global movement of animal protection organisations brings together science and policy experts from the animal welfare and wildlife conservation community who work diligently to ensure the global transformation to a world where the wellbeing of all nature, humans and animals is respected. This position paper is presented on behalf of WFA's members focused on wildlife protection.

#### Recommendation 1:

Extend the sustainable use narrative

#### Recommendation 2:

Integrate animal health and welfare considerations

#### Recommendation 1: Extend the sustainable use narrative

Sustainable use of the components of biological diversity is one of the three objectives of the Convention on Biological Diversity ('CBD'), and it is considered essential to achieving the broader goal of sustainable development. Decision V/24 frames it as one of the Convention's cross-cutting issues.

The concept of sustainability is enshrined in Draft 1.0 of the post-2020 GBF and is at the core of draft Goal B as well as Targets 5, 9 and 10. The question of how sustainability is defined and measured is therefore critical.

Under the CBD, sustainable use entails the introduction and application of methods and processes for the utilisation of biodiversity to prevent its long-term decline, thereby maintaining its potential to meet current and future human needs and aspirations. It is defined under Article 2 as the *“use of components of biological diversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining its potential to meet the needs and aspirations of present and future generations”*.

However, since the inception of the CBD, biodiversity is declining at record rates. The 2019 IPBES Global Assessment report on Biodiversity and Ecosystem Services demonstrated that human actions, such as land- and sea-use change, direct exploitation of wildlife, and climate change, are responsible for the rapid decline in global biodiversity and threaten the loss of a million species, many within decades, under business-as-usual scenarios, even where those scenarios include current global conservation efforts. The WWF’s 2020 Living Planet Report revealed an average 68% decline in animal population sizes tracked over 46 years (1970-2016).

While the concept of sustainability is composed of three pillars (economic, social and environmental), socio-economic considerations have historically tended to take priority over environmental concerns. The way sustainable use is coined in Draft 1.0 of the post-2020 GBF represents a straight continuation of this biased narrative. In the current draft framework, Goals and Targets are framed in terms of meeting people’s needs, when priority should first and foremost be given to the reduction of exploitation and elimination of threats to biodiversity, and to the active conservation and restoration of biodiversity in order to halt its loss and ensure its long-term recovery.

The summary report of the Thematic Consultation on the Sustainable Use of Biodiversity for the post-2020 GBF noted an emerging consensus on the need to have more clarity and definition of the concept of sustainable use as well as a need for well-defined holistic criteria for assessing sustainability if the new biodiversity Goals and Targets are to be achieved.

In short, the need for the term ‘sustainable use’ to only be applied in reference to uses which have been demonstrated to meet strict criteria for assessing biological and ecological sustainability is essential to the effective implementation of the post-2020 GBF.

### ***Our specific suggestions to improve Draft 1.0 and its accompanying documents in this regard:***

<b>Section</b>	<b>Comments and text edit suggestions (in blue bold)</b>
<u>Glossary</u> (CBD/WG2020/3/3/Ad d.2)	<p>The question of how sustainability is defined and measured is critical, and the term ‘sustainable use’ should only be applied in reference to uses which have been demonstrated to meet strict criteria for assessing biological and ecological sustainability, that will allow species and the ecosystems of which they are a part to thrive. A precautionary approach needs to be applied in its definition, given that current rates of wildlife exploitation are a main driver of biodiversity loss.</p> <p>Where absent, robust measurement methods for sustainability must also be established to take into account all uses and pressures on species (including legal</p>

	<p>and illegal wildlife trade) and incorporate the potential societal and economic impacts of wildlife exploitation on human and animal health and well-being. We encourage a clearer focus on prioritising the protection of biodiversity and viable ecosystems as opposed to a simplistic promotion of utilisation without adequate consideration of the associated complexity and risks.</p> <p>The three objectives of CBD – conservation, sustainable use, and equitable benefits – need to be considered as a ‘cascade’ rather than as separate, independent elements. Sustainable use can only be achieved once ecosystem integrity has been established. Similarly, successful species and habitat conservation, and biological stability/ sustainability, are prerequisites without which sustainable use and equitable sharing of benefits cannot be achieved. It should be made clear that ecological sustainability is a precondition to achieving the social and economic aspects of sustainability.</p> <p>We suggest the following <b>definition<sup>[1]</sup> of sustainable use</b> should be included in the Glossary and used for interpretation of the new biodiversity Goals and Targets:</p> <p><b>‘Sustainable use’ in relation to the use of wild and domesticated species of animals and plants means its responsible use in a way, following the precautionary principle, and at a rate that:</b></p> <ul style="list-style-type: none"> <li>(a) Does not contribute to the long-term decline of <u>wild and domesticated species of animals and plants</u>;</li> <li>(b) Does not lead to the loss of biological diversity of the ecosystem of which they are components;</li> <li>(a) Does not compromise ecological integrity or ecological resilience of the ecosystem of which it is a part or in which it is used, in the long-term;</li> <li>(b) Is humane and does not compromise the well-being welfare of any <del>animal of a species of</del> <u>wild or domesticated animals</u>;</li> <li>(c) Serves in, or is not detrimental to, the public interest;</li> <li>(d) Considers the social, economic, and environmental impacts of activities collectively, including disadvantages and benefits; and</li> </ul> <p><b>Ensures continued and future benefits that are fair, equitable, and meet the needs and aspirations of present and future generations [of people].</b></p>
<p><u>Target 5 on wildlife exploitation, trade and use of wild species</u> (CBD/WG2020/3/3)</p>	<p>Proposed new text for Target 5:</p> <p>Ensure that the <del>harvesting</del> <b>[exploitation]</b>, trade and use of wild species is sustainable, legal, and safe for <del>human health</del> <b>[human and animal health and welfare]</b>.</p> <p>Our key concerns are how the terms ‘sustainable’, ‘legal’ and ‘safe’ in Target 5 may be interpreted, and the associated indicators that will be used to measure progress.</p>

	<p>Target 5 should at least refer to ensuring that use should be well within ecologically sustainable limits, and safe for human, animal and wider ecosystem health and wellbeing.</p> <p>In the Glossary – ‘sustainable, legal, and safe for human health’ is defined as follows: <i>‘Implies the harvesting, trade and use of organisms at a rate within the bounds of its capacity for renewal, respects international and national laws and is safe for people and wildlife (e.g., does not contribute to the spread of pathogens or invasive species)’</i>.</p> <p>Currently defined as ‘<i>within the bounds of its capacity for renewal</i>’, we argue that this is critically unambitious, once again referring exclusively to the function of wildlife as a consumable resource which requires sustainability only so that it may continue to be exploited. A more appropriate view would be to acknowledge the need for biological and ecological sustainability, which allows for recovery, and safeguards against loss of ecosystem integrity.</p> <p>We also recommend replacing ‘harvesting’ with ‘exploitation’, as the former term holds a more anthropocentric view, presenting animals solely as an exploitable commodity without the capacity to suffer, similar to corn or wheat, ignoring the key role they occupy in healthy and functioning ecosystems, the vital role they play in supplying humans with key services, as well as their social capacity and ability to suffer.</p>
<p><u>Indicators for Target 5</u> (CBD/WG2020/3/3/AD D1)</p>	<p>More work is required to refine the Target’s indicators, which continue to lack true measures of ecological and biological sustainability. We recommend three headline indicators, one for each of the Target components. Legality is not in itself a direct measure of sustainability or safety. The target suggests that if it is not illegal or unsustainable, it is therefore safe, which isn’t necessarily the case.</p> <p>On Indicator 5.0.1 (‘Proportion of wildlife that is harvested legally and sustainably’), “proportion” is extremely difficult to objectively ascertain, from the perspective of quantifying both legal and illegal offtake.</p> <p>There could be an indicator on trends in the adoption of policies, laws and regulations. An indicator could focus on measuring levels of compliance with other biodiversity-related Conventions that deal with threatened species including the CMS and CITES, measuring the degree of implementation and enforcement efforts through international instruments (such as ICCWC) for all types of wildlife, terrestrial and marine, and not just those species listed under CITES.</p> <p>The introduction and enforcement of stronger regulation, through national measures as well as CITES could drastically reduce the illegal and unregulated harvest for trade in species that are threatened now or may become so, and that are posing particular risks for human health.</p> <p>The monitoring framework needs to ensure effective efforts to prevent and combat illicit wildlife trafficking and consider both supply and demand of illegally sourced wildlife products. Efforts to directly address the illicit trafficking in wildlife are intrinsically linked to, <i>inter alia</i>, consumer behaviour and consumption patterns, policy structures, and governance issues.</p>
<p><u>Target 9 and Target 10 on sustainable wildlife and ecosystem management</u></p>	<p>Biological and ecological sustainability is key to the long-term ability to provide equitable benefits. These Targets should focus on investment in wildlife and nature protection, and specifically incorporating criteria for investments which include no damage as a minimum - and preferably net biodiversity benefits - into development funding, alongside recognising animal welfare as a key component, focussing on essential ‘ecosystem services’, and reducing non-essential uses.</p>

(CBD/WG2020/3/3)	
<u>Indicators for Target 9 and Target 10</u>  (CBD/WG2020/3/3/AD D1)	<p>9.0.1 is not a measure of sustainability – indeed short to medium term rises in this indicator could be indicative of further damage and depletion of wildlife and biodiversity. There is a need for qualitative indicators.</p> <p>Further, with indicator 9.0.1, it is unclear whether the intended positive outcome would indeed be a reduction in the number of people relying on wildlife for their livelihoods. Encouraging the use of depleting resources is bound to have further damaging impacts on people and their livelihoods, particularly the most vulnerable. Wildlife recovery needs to be addressed as an utmost priority.</p> <p>Cross-link with SDG 1 and associated indicators, as efforts to bring people out of poverty can help reduce reliance on the exploitation of wildlife by vulnerable people.</p> <p>An additional indicator for Target 10 should address the financial flows to agricultural and aquaculture projects, quantifying the portion of financing that is tied to safeguards ensuring sustainability.</p>

## Recommendation 2: Integrate animal health and welfare considerations

The COVID-19 pandemic, likely to have emerged as a result of exploitation of wild animals, should be a catalyst for real transformative changes to our relationship with wildlife and nature, as the reasons why zoonoses are becoming so problematic in today's world lie in the way we humans interact with and exploit wildlife and natural habitats.

COVID-19 has brought home the risks that commercial wildlife trade and consumption pose to human society. While a lot of emphasis has been placed on wildlife markets and trade for human consumption as food, the risks extend to all forms of wildlife use and abuse where humans and wildlife come into close contact, and we therefore must not allow the focus to become too narrow.

Through the development of both the post-2020 GBF and the Global Action Plan for Biodiversity and Health, the CBD, alongside its partners, has an unprecedented opportunity to recommend the truly transformative approaches necessary to mitigate pandemic risks, conserve and protect biodiversity, while halting and reversing its loss, and to reset our fundamental relationship with the natural world.

In the wake of COVID-19 the post-2020 GBF must recognise the threat posed to human and animal health from emerging zoonotic diseases, with over 70% of new and emerging infectious diseases in humans being zoonotic, a large proportion of which originating from wildlife.

An integrated biodiversity/zoonotics perspective is required. There is clear scientific evidence that both regulated and unregulated offtake, trade and use of wildlife, particularly birds and mammals, presents threats to human health. Crowding, stress and injury among wild animals provide the perfect environment for pathogens to spread and mutate, and their close proximity to people during capture, farming, transportation, butchering, processing and trade creates many opportunities for transmission between individuals and species, and potentially to people.

Wild animal welfare should be considered a key element in the prevention of future pandemics. Integration of animal health and welfare into the post-2020 GBF is key to ensuring an equitable,

sustainable and humane future. Just as “*human health and animal health are interdependent and bound to the health of the ecosystems in which they exist*”<sup>1</sup>, preserving and improving animal welfare has various direct and indirect connections with human wellbeing and environmental issues.”<sup>2</sup>

Further, document CBD/SBSTTA/24/3/Add.2 discussed during SBSTTA-24 noted that “*the Biodiversity-inclusive One Health transition is partly covered through proposed Targets 1, 4, 9, 10 and 11 [from the updated zero draft], but with no particular focus on a One Health approach*” which has been identified by OIE as “*a collaborative global approach to understanding risks for human and animal health (including both domestic animals and wildlife) and ecosystem health as a whole*”.

We strongly encourage eliminating the commercial trade and markets in wild animals (whether from the wild or captive bred/farmed), regardless of whether it is legal or illegal, or considered sustainable or unsustainable, prioritising the mitigation of animal and human health risks.

### ***Our specific suggestions to improve Draft 1.0 and its accompanying documents in this regard:***

<p><u>E.2050 Vision and Mission</u> (CBD/WG2020/3/3)</p>	<p>The principle of Living in Harmony with Nature implies creating a world where people and animals can thrive into the future while living well within the planet's biological limits. To achieve this vision, the global community needs to build a non-anthropocentric relationship with the natural world which acknowledges the interrelatedness of human and non-human life. We would like to see this approach embedded in the post-2020 GBF, with actions that are not grounded solely in perceived human interests, reflecting our proposed definition of sustainable use.</p> <p><i>'A world of living in harmony with nature where: 'By 2050, biodiversity is respected for its own intrinsic value, is effectively conserved and restored, and where its utilisation is subject to biological and ecological sustainability criteria, with a view to ensuring thriving wildlife populations and improved ecosystem services, sustaining a healthy planet for the benefit of all people life'.</i></p> <p>Here recalling that the recognition of “the intrinsic value of biological diversity and its components” is stated in the Preamble paragraph 1 of the Convention on Biological Diversity.”</p>
<p><u>Target 4 on species conservation and recovery, human-wildlife-conflict</u> (CBD/WG2020/3/3)</p>	<p>Human-wildlife conflicts, by definition, “occur whenever an action by humans or wildlife has an adverse impact on the other.”<sup>[1]</sup> Therefore, conflict can encompass both crop damage by wild animals, but also habitat conversion by humans. Conflict resolution, however, periodically entails lethal or other interventions that benefit human wellbeing while having an adverse impact on wild animals. Recognizing that human-wildlife conflict is bidirectional in nature, resolutions should also be bidirectional by supporting positive outcomes for both humans and wild animals.</p> <p>Dubois et al., (2017)<sup>[2]</sup> set out seven principles for ethical wildlife control, which provide an important ethical framework for managing human-wildlife conflicts. These include “that efforts to control wildlife should begin wherever possible by altering the human practices that cause human–wildlife conflict and by developing a culture of coexistence; be justified by evidence that significant harms are being</p>

<sup>1</sup> See <https://www.oie.int/en/what-we-do/global-initiatives/one-health/>

<sup>2</sup> See <https://www.onewelfareworld.org/>

	<p>caused to people, property, livelihoods, ecosystems, and/or other animals; have measurable outcome-based objectives that are clear, achievable, monitored, and adaptive; predictably minimize animal welfare harms to the fewest number of animals; be informed by community values as well as scientific, technical, and practical information; be integrated into plans for systematic long-term management; and be based on the specifics of the situation rather than negative labels (pest, overabundant) applied to the target species.”</p> <p>Wildlife management should also seek to manage wildlife as though it is borrowed from future generations, rather than inherited by past generations. Thus it is important to take a forward-looking assessment when navigating management decisions. In general, there is a trend globally for changing societal values, recognition and respect for the welfare of individual animals, alongside that for species. This is supported by increasing scientific understanding of what constitutes good welfare for a number of species, as well as the sentience and cognitive abilities of animals. These changing values and scientific understanding, which are likely to continue through future generations, must be taken into account when designing long-term wildlife management policies.</p> <p>Therefore, we recommend emphasizing in Target 4 the need to achieve a balance between human and animal interests in conflict resolution</p> <p>“Ensure active management actions to enable the 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 and safeguard animal welfare and human well-being.</p> <p>[1] Conover, M. Resolving Human-Wildlife Conflicts: The Science of Wildlife Damage Management. 2002. CRC Press. Pg 8.</p> <p>[2] Dubois et al., (2017), International consensus principles for ethical wildlife control <a href="https://conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.12896">https://conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.12896</a></p>
<p><u>Target 5 on wildlife harvesting, trade and use</u> (CBD/WG2020/3/3)</p>	<p>Proposed new text for Target 5:</p> <p>Ensure that the harvesting <b>[exploitation]</b>, trade and use of wild species is sustainable, legal, and safe for <del>human health</del> <b>[human and animal health and welfare]</b>.</p> <p>Under the purview of the CBD, any ‘sustainable use’ of wildlife should account for its intrinsic value (as stated in the Preamble of the Convention), i.e., that wildlife is worthy of protection in its own right. There is therefore the mandate for measures aimed at reducing use and trade below what would be considered ‘biologically sustainable’ levels and avoiding the exploitation of wildlife to ‘maximum sustainable yield’.</p> <p>Target 5 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.</p> <p>Uses should not be considered in isolation; a use can only be considered sustainable when it is considered alongside all other impacts on a population. We advocate a focus on non-lethal uses of wildlife, and a recognition that wildlife that is part of healthy and functional ecosystems already ‘pays’ through the ecosystem services provided to people.</p>

	<p>A further consideration is that some forms of harvesting, use and trade may be legal but unsustainable, or may be sustainable and legal but unsafe from, for example, a zoonotic disease perspective. Safe should mean posing zero risk to human and animal health.</p> <p>Further, we argue that this should be expanded from “safe for human health” to “safe for people and both wild and domestic animals...” This is a more comprehensive application of the One Health approach, which recognizes the linkages between human, animal and environmental health. Through the wildlife trade, wild animals may also be exposed to, and infect, domestic animals, for example, at markets where both wild and domestic animals are sold. Target 5 should be wide enough to account for scenarios where diseases are transferred from wild to domestic species, often with severe consequences for both the welfare of the animals infected, but also the humans who depend on them.</p> <p>The Target could be made clearer and closer aligned with its intended meaning by replacing ‘safe for human health’ with ‘human and animal health and welfare’.</p>
<p><u>Indicators for Target 5</u> (CBD/WG2020/3/3/A DD1)</p>	<p>None of the current proposed indicators for this target address the risks to human health from exploitation and trade. An indicator should be added that aligns with the WHO, FAO, OIE and UNEP guidance on actions that national governments should consider adopting urgently with the aim of making traditional markets safer, published in April 2021[3].</p> <p>This guidance includes a list of wildlife species and conditions under which they could present significant risks of transmitting zoonoses, and guidelines towards mitigating these risks. It recommends the suspension of trade in live caught wild animals of mammalian species for food or breeding purposes, and the closure of sections of food markets selling live caught wild animals of mammalian species as an emergency measure unless demonstrable effective regulations and adequate risk assessment are in place. The document also notes that, while its recommendations focus on the risk of disease emergence in traditional food markets where live animals are sold for food, it is also relevant for other utilisations of wild animals.</p> <p>Clear indicators are needed to measure reductions in the commercial exploitation of wildlife that poses a risk to human or animal health. We would recommend the consideration of an indicator such as that adopted by CMS in its Strategic Plan for Migratory Species, that measures ‘trends in implementation of measures designed to minimise impacts of hunting and fisheries on migratory species, their habitats and their migratory routes’.</p>
<p><u>Target 6 on Invasive Alien Species</u></p>	<p>This Target is closely linked with Target 5.</p> <p>It must focus on prevention, as preventing is far more cost-effective than attempting to eradicate alien species once they become established.</p> <p>Additionally, the current component of the Target does not include any reference to the humane management of invasive species management. The seven principles for ethical wildlife control developed by Dubois et al., (2017)[4] again should be considered when establishing measures for managing invasive species.</p>

These include “that efforts to control wildlife should begin wherever possible by altering the human practices that cause human–wildlife conflict and by developing a culture of coexistence; be justified by evidence that significant harms are being caused to people, property, livelihoods, ecosystems, and/or other animals; have measurable outcome-based objectives that are clear, achievable, monitored, and adaptive; predictably minimize animal welfare harms to the fewest number of animals; be informed by community values as well as scientific, technical, and practical information; be integrated into plans for systematic long-term management; and be based on the specifics of the situation rather than negative labels (pest, overabundant) applied to the target species.”

As regards a suitable indicator 6.0.1, use standard Environmental Impact Classification of Alien taxa that scores the damaging impacts of invasive species, since measuring the spread in number of invasive species in and of itself is not necessarily a reflection of impact on biodiversity.

[4] Dubois et al., (2017), International consensus principles for ethical wildlife control  
<https://conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.12896>