



**BORN FREE RESPONSE TO THE ZERO DRAFT OF THE  
POST-2020 GLOBAL BIODIVERSITY FRAMEWORK  
(CBD/WG2020/2/3)**

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[www.bornfree.org.uk](http://www.bornfree.org.uk)

Charity No 1070906

## ABOUT BORN FREE

Born Free is a UK-based international charity whose purpose is to conserve and protect wild animals, natural habitats and functioning ecosystems in perpetuity, and to end the exploitation of wild animals, whether free-living or in captivity. Born Free advocates for better recognition of wildlife protection as key to the future of humanity. We promote a compassionate and highly precautionary approach to the delivery of meaningful sustainable development outcomes, contributing to a flourishing, sustainable future where people and wildlife can co-exist for their mutual benefit.

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## INTRODUCTION

Born Free welcomes the publication of the zero draft of the Post-2020 Global Biodiversity Framework (CBD/WG2020/2/3), and acknowledges the tremendous efforts by the Co-Chairs to collate stakeholders' views and produce a concise yet comprehensive document.

It is evident that a lot of thought has gone into developing this draft framework, and we believe that its overall structure represents an improvement over the Strategic Plan for Biodiversity 2011-2020 and its associated Aichi Targets. The zero draft will provide a solid basis for discussion at the second meeting of the Open-Ended Working Group (WG2020-2) from 24<sup>th</sup> to 29<sup>th</sup> February 2020 in Rome, Italy.

Born Free is pleased to see the inclusion of some important elements in the draft framework, including: the intention for it to be a call for urgent and transformative change; the outcome-oriented and action targets as well as whole-of-government and society approaches; a species-specific Goal; the parallel development of a robust monitoring framework with measurable indicators for every Goal and target; acknowledgment of a rights-based approach; repeated mentions of the role of key stakeholder groups; and the promotion of synergies and alignment with strategies and targets of other processes, including Multilateral Environmental Agreements and the 2030 Agenda for Sustainable Development.

However, we are also concerned that, in its current form, the draft document fails to articulate the framework's potential to reverse the tragic and continuing global loss of biodiversity. While we broadly support the framing and promising language in section I ('Introduction') of Annex I in CBD/WG2020/2/3, we feel that section II ('The Framework') requires substantial further work in order to fully reflect these bold ambitions, thereby establishing the means to deliver "transformative changes" needed to restore and protect nature, as recommended by the 2019 IPBES Global Assessment Report on Biodiversity and Ecosystem Services.

This submission, therefore, focusses on Section II (A to D) of the draft document. It outlines Born Free's views on both structural elements and content of the zero draft, highlighting our main concerns as well as providing some specific comments, suggestions for text changes and other recommendations. Please note that we will continue to update our position in the light of the negotiations leading up to the 15th Conference of the Parties to the Convention on Biological Diversity (CBD CoP15). We look forward to continuing to constructively engage in the process of developing the Post-2020 Global Biodiversity Framework at the UN Biodiversity Conference in October 2020, in Kunming, China.

## OUR KEY RECOMMENDATIONS

### **1. Raise the bar: ensure objectives and actions reflect the need for transformative changes to restore and protect nature, and overcome vested interests harmful to the framework's objectives**

The 2019 IPBES Global Assessment Report on Biodiversity and Ecosystem Services<sup>1</sup> highlighted that nature's decline is unprecedented in human history, and that extinction rates are accelerating. In order to create the truly transformative changes required to conserve and restore biodiversity for the survival of planet and people, the global community cannot afford to compromise on ambition. Given the importance of nature to human existence and well-being, the current level of ambition in the zero draft does not sufficiently reflect this reality, nor does it echo the multiple calls for bold, urgent and accelerated action.

As a starting point, we suggest that the 2030 Mission is reframed to better capture the gravity of the biodiversity crisis, and that the Goals relate more clearly to the action targets. Further, while we understand that natural and social systems have time lags between the implementation of actions and the emergence of measurable change, having 2050 as an endpoint for the new Goals risks losing a vital sense of urgency, and a delay in the implementation of actions. We would therefore urge that the framework includes ambitious timelines focused on nearer-term outcomes (2030).

## **2. Address all drivers of biodiversity loss: direct and indirect**

It has now been widely-acknowledged that comprehensively and explicitly addressing the direct and indirect drivers of biodiversity loss is the key to a successful framework, in order to secure nature's long-term resilience. Despite being identified as the second most significant direct driver for the loss of biodiversity,<sup>2</sup> the direct exploitation of wildlife and other organisms receives very limited attention in the current draft. We encourage a much stronger commitment to tackling all forms of wildlife exploitation (including but not limited to wildlife trade and trafficking), with a clear focus on prioritising the protection of wildlife, biodiversity and viable ecosystems as opposed to the promotion of utilisation.

In addition, responses that are limited to addressing the direct drivers will neither be sufficient nor sustainable, e.g. efforts to directly address the illegal trade in wild animals are intrinsically linked to, *inter alia*, consumer behaviour and consumption patterns, policy structures, and governance issues. All direct and indirect drivers of biodiversity loss (including trade, production, consumption, institutions and governance systems) must be addressed equally and in tandem. Since the enabling conditions required to reach each Goal vary, the development of specific actions designed to address the indirect drivers for each Goal would be beneficial.

## **3. Reframe the sustainable use narrative: focus on protecting wildlife**

One million species are estimated to be at risk of extinction, many within decades. The unprecedented decline in nature, and its dire implications for all life, should be the primary factors guiding the development of the new framework. The protection of biodiversity should be prioritised over and above its exploitation and use. The current draft reads as if we are aiming to protect biodiversity primarily for the purpose of maintaining and enhancing exploitative opportunities through so-called "sustainable use" (e.g. Action targets 12(b)(7) and (8)).

There is a compelling need to instil the notion of co-existence with nature in the new framework, and to switch the emphasis towards promoting biodiversity protection for its intrinsic value. Born Free has suggested some changes in the tables below and looks forward to participating in the upcoming thematic consultation on the sustainable use of biological diversity to make specific recommendations on how the sustainable use narrative and its associated components can be reframed.

## **4. Strengthen the species conservation targets: include a proactive approach**

We welcome the inclusion of a species-focused Goal (10(b)), which is in many ways a successor to Aichi target 12. The latter, which aimed for 0% species' extinctions by 2020, has not been achieved, because of a lack of emphasis on addressing drivers of biodiversity loss. We believe that ambition for species conservation objectives should not be weakened but maintained, with an enhanced focus on addressing the direct and indirect drivers of species declines.

Further, while recognising that success in achieving Goal 10(b) will strongly depend on actions taken to address other drivers of biodiversity loss that are already integrated in the zero draft (e.g. area-based conservation measures), we strongly believe that a greater focus on *in situ* conservation actions in the framework would provide greater coherence and deliverability, including through recognising the value of and promoting positive conservation approaches such as rewilding (where appropriate and as part of carefully structured and monitored programmes).

## **5. Integrate consideration for individual wild animals and their welfare: individuals matter and this consideration is critical for successful conservation**

The 2019 Global Sustainable Development Report<sup>3</sup> identified that consideration of animal welfare was missing in the sustainable development agenda. It also restated the identified links between animals and human health, and called for "strong governance to safeguard the well-being of both domesticated and wild animals". In its current form, the zero draft fails to recognise the intrinsic value of individual animals (the single reference in a footnote does not reflect its significance), and further fails to acknowledge the need to fully integrate consideration of the critical role that individuals play in any animal management and conservation approach (including integrated pest management).

The importance of incorporating consideration of animal culture and social complexity when designing conservation interventions in social species, has been recognised by the United Nations Convention on the Conservation of Migratory Species of Wild Animals (CMS), and forms an increasingly important work stream within that Convention. We urge the CBD to seize this opportunity to embed these concepts in the scope and implementation of the Post-2020 Global Biodiversity Framework. It is important to ensure that the framework leads to the adoption of evidence-based management strategies which recognise that wildlife is worthy of protection in its own right, as well as for the ecosystem services it provides for people.

## SPECIFIC COMMENTS AND SUGGESTED CHANGES

The following tables focus on sections of the framework that are most relevant to the work and expertise of Born Free. Insertions are in **bold** and deletions are in ~~strike through~~:

Annex I		
Document section	Suggested text changes	Rationale for suggested change(s)
<b>II. The Framework</b>		
<b>A. 2050 Vision</b>		
<p>“A world of living in harmony with nature where: ‘By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people”.</p>	<p>“A world of living in harmony with nature where: ‘By 2050, biodiversity is <b>respected for its own intrinsic value</b>, is effectively conserved <b>and</b> restored, and <b>used sustainably only when necessary, with a view to ensuring thriving wildlife populations and improved</b> ecosystem services, sustaining a healthy planet for the benefit of all <del>people</del> <b>life</b>”.</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. We would like to see this approach embedded in the post-2020 framework, with actions that are not grounded solely in human concerns.</p>
<b>B. 2030 and <del>2050</del> Goals</b>		
	<ul style="list-style-type: none"> <li>&gt; Born Free welcomes the overarching outcome-oriented Goals that depict the proposed projected state of biodiversity and guides the identification of transformative actions required to achieve these results.</li> <li>&gt; We propose that the Goals should have 2020 baselines and a 2030 endpoint, to reflect the sense of urgency in the (revised) 2030 Mission. This approach received strong support at OEWG-1 and SBSTTA23.</li> <li>&gt; We suggest that, for coherence purposes, the 2030 Goals should supersede the 2030 Mission.</li> <li>&gt; While we understand that these five Goals are designed to achieve the three objectives of the Convention, any efforts to achieve them will be undermined unless enabling conditions are simultaneously addressed, and unless adequate implementation and associated support mechanisms are in place. We believe that, in particular, the need for enhanced international co-operation, alignment with the 2030 Agenda for Sustainable Development, as well as the development of strong policy structures, systems and capacity, should be, at the very least, referenced in this section, or form part of a sixth Goal.</li> <li>&gt; We also advocate for increased consideration of the concept of ecological connectivity, which needs to be better represented in this section and in the framework as whole.</li> </ul>	
10(a) on a goal for ecosystem	<p>10(a) <del>No net loss</del> <b>By 2030, increase</b> in the area, <b>connectivity</b> and integrity of <b>terrestrial</b>, freshwater, marine and <b>natural</b> ecosystems, <b>with no loss of key areas for biodiversity</b>, ensuring ecosystem resilience.</p>	<p>Goal (a) should be aligned with the language and level of ambition proposed in action target 1, and aim at an increase by 2030 in the area, connectivity and integrity of ecosystems.</p>
10(b) on a goal for species	<p>10(b) <b>By 2030, no human induced extinctions of known threatened species; a decrease in species threatened with extinction by X%; and an increase of X% of viable species populations exhibiting the full range of their ecological interactions, functions, and other roles in the ecosystem; and that this increase has been achieved across a representative set of ecosystems and communities throughout their range.</b></p>	<p>The formulation of Goal (b) should be significantly revised to aim at zero human-induced species extinctions and declines by 2030. It should also capture a positive change, by ensuring healthy and viable species populations.</p>

# Annex I

## II. The Framework

Document section	Suggested text changes	Rationale for suggested change(s)
10(d) on a goal for nature's benefits to people & 10(e) on a goal for equitable sharing of benefits	<p>When there is only a limited number of Goals, it is striking to see that two of the Goals, namely (d) and (e), are about ensuring people benefit from nature provisions. The focus should be on halting the loss of biodiversity and restoring it, which will ultimately benefit wildlife and people alike. Maintaining and enhancing the benefits that nature provides to people is clearly a part of the rationale for protecting, but the Goals should not be primarily driven by this.</p> <p>Goals/sub-goals that are aimed at improving nutrition, access to safe water, and other benefits, may result in Parties reporting successful achievement even if biodiversity has declined as result. Goal (d) could be reframed to focus on the interconnections between climate change, biodiversity and ecosystem services.</p>	

## C. 2030 Mission

- > We believe that the 2030 Mission should precede the 2030 Goals, as it provides an overarching general objective from which the Goals and Action targets should stem.

<p>“Take urgent action across society to put biodiversity on the path to recovery for the benefit of planet and people”.</p>	<p>“Take urgent <b>and transformative</b> action across society to <b>put restore and conserve</b> biodiversity <del>on the path to recovery</del> for the benefit <b>survival and benefit</b> of <del>planet</del> <b>nature, people and animals</b>”.</p>	<p>The interrelated biodiversity and climate crises are driving the planet to a dangerous point of no return. The 2030 Mission needs to reflect this existential threat and highlight the vital importance of biodiversity in order to convey the sense of urgency, and galvanize the level and scale of transformative changes needed across society to reverse the trend.</p>
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Footnote 12	<p>We are pleased to see recognition of the intrinsic value and existential importance of biodiversity, but strongly urge integration of these concepts in the core text in Annex I, to reflect the need ‘to transform society’s relationship with biodiversity’ as expressed in A. Background of the Introduction section (I).</p> <p>Further, this footnote is problematic as it risks undermining the framework’s ambition.</p> <p>The worrying statements include:</p> <ul style="list-style-type: none"> <li>&gt; ‘Completely halting the loss of ecosystems, species and genetic diversity is not possible by 2030’. Halting and reversing the loss of biodiversity by 2030 is achievable if adequate transformative actions are urgently implemented.</li> <li>&gt; ‘It also implies the need for a stabilization in the rate of loss of biodiversity’. This statement implies that the global community should come to terms with an ambition to maintain the current rate of biodiversity loss. This acceptance of the “business as usual” approach not only undermines the framework’s level of ambition, but also jeopardises the delivery of the 2030 Agenda for Sustainable Development, as established in the IPBES Global Biodiversity Assessment. Specifically, current negative trends in biodiversity and ecosystems will undermine progress towards 80% of the assessed targets of SDGs related to poverty (SDG 1), hunger (SDG 2), health (SDG 3), water (SDG 6), cities (SDG 11), climate (SDG 13), oceans (SDG 14) and land (SDG 15).</li> </ul>
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# Annex I

## II. The Framework

Document section	Specific comments
<b>D. 2030 Action Targets</b>	<ul style="list-style-type: none"> <li>&gt; All targets should be focused on the delivery of clear transformative actions with specific deadlines and tangible outcomes. Their level of ambition should be commensurate with a bold (revised) 2030 Mission Statement.</li> <li>&gt; While we understand the motivation behind maintaining a limited number of targets, we note that several of the proposed targets encompass multiple dimensions whereas others have a single focus. When necessary, targets should be broken down into sub-targets in order to provide clarity and specificity.</li> <li>&gt; Article 8 of the text of the Convention on <i>in-situ</i> conservation includes a fundamental requirement for Parties to ‘promote... the maintenance of viable populations of species in natural surroundings’ and the ‘recovery of threatened species’. The absence of a species-specific action target in the current form of the zero draft is extremely worrying. Born Free strongly believes that the conservation of species is critical to the maintenance of healthy ecosystems and provision of ecosystem services. The maintenance or re-establishment of intact faunal communities (e.g. dispersers of large seeds), is critical to the long-term success of ecological restoration efforts such as reforestation, and reinforces calls for carefully managed trophic rewilding as a conservation strategy to maintain ecosystem function.</li> </ul>

### Paragraph 12(a) Reducing threats to biodiversity

12(a)(1) on a target for spatial planning and ecosystems	<p>This target relating to Goal 10(a) on ecosystems contains several elements and would benefit from being split into sub-targets: preserving existing intact areas and wilderness; restoring ecosystems and improving connectivity and integrity; and ensuring half of the world’s land and sea areas are under comprehensive spatial planning. We also recommend clearly defining ‘comprehensive’ spatial planning, and would further argue that planning constitutes a tool for achieving the other elements in this target, and could therefore be moved to section (c) on ‘Tools and solutions for implementation and mainstreaming’.</p> <p>We further note that this target lacks a tropical forest-focused indicator (i.e., Amazon and Congo basins), or an indicator for peatlands, which are known to be very important for carbon sequestration.</p>
12(a)(2) on a target for protecting sites of particular importance for biodiversity	<p>We welcome the inclusion of this target as an improved successor to Aichi target 11, but are concerned that important language from the previous target is missing, including on the effective and equitable management of ecosystems, and on connectivity. To be successful in conserving biodiversity, it is fundamental that protected areas and other effective area-based conservation measures (OECMs) are well-connected, effectively managed, enforced, monitored and resourced. It is critical that ‘sites of particular importance for biodiversity’ are prioritised, but they need to be more clearly defined in qualitative measures to avoid confusion.</p> <p>We are also concerned that the 10% placeholder target relating to land and sea areas under strict protection is unambitious.</p>
12(a)(3) on a target for invasive alien species control	<p>Born Free supports a preventative and humane approach to invasive species management, which we would like to see reflected in this target.</p>
12(a)(5) on a target for harvesting, trade and use of wild species	<p>Overexploitation, of animals, plants and other organisms, mainly via harvesting, logging, hunting and fishing, is identified as one of the main drivers of biodiversity loss. This current related target is vague and should be reframed.</p> <p>We urge that the terms ‘legal and sustainable’ be explicitly defined, and indication is provided on how this will be evaluated. All use, both legal and illegal, would be important to consider in any such assessment.</p> <p>This target should also include actions aimed at implementing practical solutions that develop a culture of coexistence with wildlife, recognising that positive societal attitudes towards biodiversity will result in improved long-term conservation outcomes.</p>

## Annex I

### II. The Framework

#### Document section

#### Specific comments

### D. 2030 action targets

#### Paragraph 12(b) Meeting people's needs through sustainable use and benefit-sharing

12(b)(7) on a target for the sustainable use of wild species & 12(b)(8) on sustainable use of biodiversity in agricultural and managed ecosystems

As already mentioned in our key recommendations above, Born Free is concerned with the framing of this target, which emphasises the value of increasing the use and productivity of wild species, while failing to identify how this can be achieved in such a way that will benefit rather than harm those wild species and their natural habitats.

The question of how sustainability is defined and evaluated is hugely significant. The term 'sustainable use' should only be applied in reference to uses which have been demonstrated to meet strict criteria for assessing sustainability. Further, the sustainability of a particular form of use cannot be considered in isolation from other uses or impacts on a population or species.

It is crucial that emphasis is placed on maintaining and increasing biodiversity within managed ecosystems in order to support their sustainability, as opposed to enhancing the productivity and use of wildlife, particularly in respect of species in decline. For example, the current use of elephants, pangolins, rhinos, and other declining species is clearly not sustainable. All of these species have declined dramatically in recent decades, and continue to do so, in part due to continuing unsustainable use.

Any assessment of 'sustainable use' should pay due regard to the needs of sentient species, and that use should not have a negative impact on population size or functionality. The use of the term 'sustainable use' suggests that the effects will accrue on uses that are sustainable. It cannot be assumed that use is 'sustainable' until it has been demonstrated to be so.

In its preamble text, the CBD refers to the 'intrinsic value of biological diversity'. It defines 'sustainable use' 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.' Under the purview of the CBD, any 'sustainable use' of wildlife should therefore take into account the intrinsic value of wildlife, which is worthy of protection in its own right, as well as for the ecosystem services it provides.

We support the inclusion of animal welfare as a key criterion which should be included in determining whether a use is sustainable. We suggest using the International Consensus Principles for Ethical Wildlife Control<sup>4</sup> as a tool to guide evidence-based strategies that minimise the suffering of wild animals. This set of principles was formulated with the goal of managing human-wildlife conflict in an ethical manner. The principles can also be leveraged as entry points to include animal welfare considerations in the scope and implementation of programmes aimed at effectively managing wildlife and addressing associated sustainability challenges. One of the principles calls for, where applicable, modifying human practices and behaviour to foster coexistence with wildlife. This requires adopting a proactive approach that addresses the root causes of conflicts with wild animals rather than a reactive one that may cause unnecessary and avoidable suffering to individual animals. Another requires providing sound evidence that any management practices that involve wildlife are justified and that significant harm would ensue to ecosystems, animals or people if such practices were not employed.

It should also be made clear that actions aimed at delivering this target should be consistent with Parties' commitments in other international agreements such as CITES or CMS.

Finally, human-wildlife conflict should be part of section (a) on reducing threats to biodiversity rather than section (b) on meeting people's needs.

## Annex I

### II. The Framework

#### Document section

#### Specific comments

### D. 2030 Action Targets

#### Paragraph (c) Tools and solutions for implementation and mainstreaming

Most targets in this section are vague, ambiguous, or should be moved to other sections in the document. The actions associated with the targets are unclear, as are the contributions they will make to the Convention's objectives.

12(c)(12) on a target on reforming incentives and eliminating subsidies

We encourage the deletion of the word 'most'. All incentives should be reformed and all subsidies eliminated, not only the most harmful for biodiversity. The framework should also promote the decoupling of economic growth from environmental degradation, including through a transformation in policies and tax reforms.

12(c)(13) on a target for biodiversity mainstreaming

We recommend mainstreaming the conservation and sustainable use of biodiversity and the sustained provision of nature's contributions to people into all sectoral policies, plans, programmes, strategies and practices, through proactive, focused and goal-oriented approaches to environmental action.

We would also note that 'offsetting' approaches should not be prioritised over preventing further biodiversity loss and enhancing existing natural systems.

This target should also better recognise trade-offs between biodiversity conservation and other SDGs, and should be linked to the mandate and work of the other biodiversity-related Conventions, including CITES and CMS. Alignment of updated National Biodiversity Strategies and Action Plans (NBSAPs) with national SDG implementation plans should be ensured.

12(c)(14) on a target for economic sectors

As highlighted in the latest IPBES Global Assessment report, 'a key constituent of sustainable pathways is the reform of global financial and economic systems to engineer a global sustainable economy'. This target needs to specifically refer to the most biodiversity-destructive sectors in order for Parties and other relevant stakeholders to prioritise actions.

12(c)(15) on a target for resource mobilisation and capacity-building

The framework should aim at achieving a sustainable co-existent economy, including by identifying resources beyond traditional aid flows. Deploying and scaling-up innovative financing approaches to support conservation would be highly beneficial and contribute to a new development paradigm, necessary to ensure the growth of sustainable natural systems and moving away from the current economy-focused model.

Conservation bonds, a derivative model similar to green bonds but aimed at the specific requirements of integrated wildlife protection, focus on performance-based payments. Conservation bonds are accompanied by a range of developmental indicators, and proceeds are utilised for financing environmental investments, projects or activities, using a landscape-scale approach. This innovative financing approach would support the emergence of sustainable wildlife-based economies, and would serve as a bridge to achieving the Sustainable Development Goals.

12(c)(17) on a target for sustainable production and consumption

This target requires greater elaboration; it is rather ambitious yet has very vague wording.

12(c)(19) on a target for participation of stakeholders

The role of non-governmental organisations in both decision-making and implementation of biodiversity conservation efforts should be better supported.

12(c)(20) on a target on social norms for sustainability

This target needs to be elaborated on further. Long-term societal transformation through continuous education, knowledge-sharing and participatory decision-making are key to bring about a transformation in society's relationship with nature.

### References

1. <https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services>
2. *Ibid.*
3. <https://sustainabledevelopment.un.org/gsdrr2019>
4. <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/cobi.12896>