

October 14, 2021

Elizabeth Maruma Mrema  
Secretariat of the Convention on Biological Diversity  
413 Saint-Jacques Street, Suite 800  
Montreal, QC, H2Y 1N9, Canada

Dear Executive Secretary Mrema:

As a global biodiversity hotspot currently experiencing unprecedented climate impacts, California can confirm that the nature crisis is real. In just the last decade, as our state's climate has changed, we have witnessed the longest and most severe drought in our California's history, year after year of record-setting temperatures and extreme wildfires, the loss of more than 150 million trees, and the collapse of kelp forest ecosystems along our northern coastline.

Climate change poses an existential threat to California's lands, waters, and native species. With climate-related stressors projected to increase in both frequency and intensity over the coming decades (threats that are underscored by dire global assessments such as the 2019 [IBPES Global Assessment Report on Biodiversity and Ecosystem Services](#) and the recent [sixth report from the Intergovernmental Panel on Climate Change](#)), we understand that there is simply no future in "business as usual." We are a subnational government that understands what is at stake in this fight, and we are proud to be taking bold action to ensure the conservation of our state's unique flora and fauna as well as the continued delivery of essential ecosystem services on which nearly 40 million Californians depend.

In October 2020, Governor Gavin Newsom issued Executive Order N-82-20, which elevates the role of nature-based solutions in California's fight to address climate change, protect biodiversity, and provide access for all Californians to the state's precious natural areas. Among other directives, this Executive Order commits our state to: (a) conserving 30% of our lands and coastal waters by 2030; (b) developing a long-term strategy for our natural and working lands to achieve carbon neutrality and build climate resilience; and (c) launching a statewide Biodiversity Collaborative to bring together groups and leaders from across California, acknowledging and welcoming the importance of an inclusive approach to biodiversity conservation.

Through Executive Order N-82-20, our state is already taking significant steps toward achieving many of the goals and targets listed in the Post-2020 Global Biodiversity Framework (GBF). We are honored to serve as an official observer to the United Nations Convention on Biological Diversity, and we look forward to both learning from CBD Parties

715 P Street, 20<sup>th</sup> Floor, Sacramento, CA 95814 Ph. 916.653.5656 <http://resources.ca.gov>



and offering our perspective where it might be helpful. After meeting with California stakeholders, attending recent convenings of the Subsidiary Body on Scientific, Technical, and Technological Advice (SBSTTA 24) and the Subsidiary Body on Implementation (SBI 3), and reviewing Draft One of the GBF, we offer the following reflections in support of Parties' bold vision of "a world living in harmony with nature by 2050."

- We encourage Parties to continue developing ambitious, specific, measurable, and achievable goals and targets that are commensurate with the overall vision of the GBF and will encourage both short-term and long-term action. We also commend Parties for proposing science-based headline indicators to help track progress toward the goals and targets. We look forward to continued discussion of the proposed headline indicators and the development of a robust monitoring and reporting process that will: assess progress towards the stated targets; strengthen a global culture of accountability to meet biodiversity goals; facilitate the participation of subnational governments; and minimize reporting burdens.
- We find the connection between biodiversity and people to be a major strength of the GBF. In California, we recognize that nature is inextricably linked with people's livelihoods, culture, and physical and spiritual well-being, and that biodiversity protections must consider all these factors. We encourage Parties to avoid language that overly commodifies biodiversity and we support a greater emphasis on equity, justice, and access to nature throughout the text.
- We appreciate that Parties recognize the critical role of indigenous peoples and local communities in biodiversity conservation. Although indigenous peoples represent less than 5% of the world's population, they effectively manage lands and waters that hold 80% of the world's biodiversity. The nature crisis cannot be meaningfully addressed without the full participation of these communities, and in California, we are working to ensure that Native American tribes are partners in our efforts to combat climate change and protect native species, for example by increasing indigenous access to California's lands and waters, supporting indigenous stewardship efforts, and elevating the role of indigenous traditional knowledge in management decisions and policy development.
- We appreciate that the GBF includes a partnership-based, whole-of-society approach. California recognizes that true progress will require action across all sectors and actors, including indigenous communities, nongovernmental organizations, relevant stakeholder groups, youth, and private industry. However, as a subnational government that is widely recognized a global leader in biodiversity conservation, California supports a greater emphasis on the essential role that subnational governments can play in implementation of the GBF.
- We commend Parties for explicitly addressing species extinctions in Goal A and Milestone A.2.
- We strongly support the growing global movement to conserve 30% of the planet by 2030 (Target 3). We also commend Parties for including language in this target that emphasizes the importance of conserving areas of high biodiversity. We encourage Parties to provide an explicit definition of conservation as part of this target, as a definition will provide valuable guidance for Parties and subnational governments seeking to implement "30 by 30" in their jurisdictions. The definition should include criteria

by which conserved areas can demonstrate stewardship, durable protections, and successful outcomes for biodiversity benefits and ecosystem health.

- We appreciate the inclusion of targets that aim to reduce threats to biodiversity, many of which are consistent with top priorities and ongoing action in California including: ensuring that degraded freshwater, marine and terrestrial ecosystems are under restoration and ecologically connected (Target 2); ensuring that the harvest, trade, and use of wild species is sustainable (Target 5); reducing the rate of species invasions (Target 6); reducing pollution and eliminating the discharge of plastic waste (Target 7); and minimizing the impact of climate change on biodiversity (Target 8).
- Compared to the Zero Draft, Draft One eliminates substantial detail in the sections on implementation support mechanisms, enabling conditions, and reporting and review. The deleted language includes important points regarding equity. Additionally, references to nature-based solutions have been removed. California has recently committed to investing over a billion dollars in the next three years on nature-based solutions to enhance the state's biodiversity while increasing carbon sequestration and climate resilience. We encourage Parties to reconsider the removal of these important elements.
- Finally, we would like to offer our support to Parties and subnational governments, particularly in the developing world, who may benefit from knowledge transfer, capacity building, and technical and scientific cooperation as we all seek to implement the GBF's ambitious goals and targets. California has made significant progress toward protecting biodiversity, protecting against illegal harvest and trade of wild species, and engaging meaningfully with stakeholder communities and indigenous peoples. We stand ready to serve as a global model and to learn from others as we move forward with this work.

California is committed to pursuing several efforts that are strongly aligned with the goals and targets of the GBF, including conserving 30% of California's lands and coastal waters by 2030, partnering with indigenous peoples, and protecting biodiversity in an equitable manner that maintains and expands access to nature for all Californians. Our science-based network of 124 ecologically connected marine protected areas safeguards a diversity of marine habitats and serves as a global model for biodiversity conservation. As we look ahead to the pivotal fifteenth meeting of the Conference of the Parties in spring of 2022, we look forward to ongoing dialogue and cooperation with Parties, subnational governments and other global partners in this fight.

Thank you for considering our comments.

Sincerely,



Wade Crowfoot  
Secretary for California Natural Resources