# REFLECTIONS ON THE ZERO DRAFT POST-2020 GLOBAL BIODIVERSITY FRAMEWORK

Second meeting of the Open-Ended Working Group on the Post-2020 Global Biodiversity Framework (WG2020-2), Convention on Biological Diversity, February 2020

**We are pleased to see a clear theory of change introducing the logic behind the zero draft post-2020 global biodiversity framework, and a clear structure separating out the outcome goals and action-orientated targets. However, we feel the overall ambition could and must be greater to deliver the transformational change that is needed to put nature on a path to recovery by 2030 and achieve the 2050 Vision, and that there are several elements missing or lacking detail or sufficient ambition that we feel could be addressed. Below we summarise some of our key messages before detailing our proposed changes to each element of the framework.**

## Key Messages

- **The outcome goals aim at a 100% sustainably managed planet, but are missing some elements:** We support the general set of outcome goals and related targets, which address all three goals of the Convention, but feel some elements are weakly represented or missing, such as ecological connectivity, international cooperation and an action-orientated target focused on species conservation. We have suggested text to strengthen these aspects within the restrictions of the current zero draft, including a potential species target while recognising the desire to limit the list of targets to 20, but feel these elements all need more consideration.

- **Reducing threats:** A number of the targets listed in the "Reducing threats to biodiversity" section are not directly about reducing the threats to biodiversity, whereas many of those included in tools and solutions are about reducing the threat. For example, technically, protected areas are a tool and solution to biodiversity loss caused by threats. Furthermore, some of the elements listed in column B of Annex 1 are more action-orientated than the elements communicated in the target. We have some concern that these important action orientated elements will be lost as they are not being communicated directly in the target.

- **Tackling the pressures and drivers of loss must be better represented:** The way many of the targets are currently worded (on increasing use and productivity without any mention of doing so in a sustainable way that benefits rather than harms biodiversity) could directly contradict or undermine the achievement of the 2030 Goals. In support we also need stronger and more upfront representation of sector-specific issues and a clear target committing to reduce countries' ecological footprint of production and consumption.

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- **On sector-specific representation:** The IPBES Global Assessment released in 2019 provided stark evidence that the direct drivers of biodiversity loss "with the largest global impact have been (starting with those with most impact): changes in land and sea use; direct exploitation of organisms; climate change; pollution; and invasion of alien species." While the zero draft has strong suggestions for targets on the latter of these five, there are concerns over how land and sea use change and direct exploitation are represented. One major concern is that sector-specific 2030 targets to tackle the pressures and drivers appear to be watered down in their prominence – even compared to the Aichi Targets. In the current presentation they are often hidden as "elements" in Column B of Annex 1 rather than targets, and the ambition level is poorly defined. If they are to be taken seriously, they need to be more clearly represented and articulated within the framework. There is good content in there on land management, pesticides and other key issues, but these are disguised behind vague target language. This could be a major problem and needs considerable further thought and discussion.

- **Marine element representation:** This is currently weak and unclear in places, or only referenced in indicators. Pressures and needs on the marine environment can be better reflected by adapting language on targets referring to e.g. pollution, harvesting/ use of wild species, and around conservation of biodiversity in agriculture, which should be broadened out to include marine ecosystems.

- **Improved connections between nature, climate change, and the Sustainable Development Goals (SDGs):** There is increased profile across the targets of the benefits that nature brings to people through clean water provision, nutrition, natural disaster resilience, etc. Compared to the previous Aichi Targets, the framework also significantly increases the recognition that nature is essential for meeting our climate commitments, and that we cannot tackle the biodiversity crisis without action on climate change. We have where relevant suggested where targets and indicators are already or could be better aligned with the corresponding SDG targets and indicators, to increase synergies, relevance and efficiencies in reporting and tracking progress.

- **Focus on international cooperation**: We support the CMS proposals regarding the post-2020 framework, which flag the need for international cooperation to deliver conservation beyond national borders and enhance synergies between the biodiversity-related conventions. For example, NBSAPs should include reference to other biodiversity-related conventions, and the draft Decision for CBD COP15 should add a paragraph to highlight the role of all biodiversity-related MEAs in implementing the post-2020 framework, by various means including coordinated implementation at national level, joint efforts for resource mobilisation, and others.

- **Think SMART!** Many of the targets in the last section on "Tools and solutions" are either confusing, vague, ambiguously worded, or in the incorrect place in the structure. It is often not clear what the action associated with the target is, or how this benefits one of the three objectives of the Convention. The premise underpinning many of these targets is largely positive and should be retained, but the language needs to be re-formulated to make this explicit.

- **On indicators:** We are concerned that many of the indicators listed in Annex 1 could be biodiversity neutral. That is, they could exhibit movement towards the goal/target without reflecting a positive change in biodiversity. In a rough analysis, we've calculated that we could see improvements in 50% of the indicators without seeing an improvement in biodiversity, and for the 2030 action targets the same is true to 40% of the indicators. This indicates the need for a greater effort to ensure that the indicators measure and reflect progress towards the 2050 mission of restoring biodiversity and the 2030 mission of putting nature on a path to recovery. We feel that the balance of indicators, especially in the goals, needs revision so that indicators related to biodiversity condition (i.e. populations or direct actions) are more prevalent than those related to process. While process indicators are important, they should be scaled back; the current balance is such that when progress towards these targets is assessed in the future, it may look like we are on track to meet the goals despite being superficially through process.

- **Improved focus on implementation:** Whilst Target 15 on resources and capacity building is hugely important within the framework, it would better sit within the implementation support mechanisms section of the framework, with the target re-focused around internalising the costs and benefits of biodiversity into economic systems. We also suggest two other elements in the "Implementation support mechanisms" section which would improve implementation. These cover the need for clear implementation plans to provide a roadmap for the delivery of targets, and the need for effective periodic review to assess national ambition and implementation versus the adopted global goals and targets.

## Summary

- Many specifics across the framework are still to be determined and 'filled in' over the next 6 months; it is crucial that at the negotiations in February, May and July Parties escalate their level of commitment and ensure these specifics elevate the framework, not water it down.
- Many of the targets and indicators must also be significantly improved; initial assessments indicate that a significant number could be achieved and monitored with no tangible impact for nature by 2030.
- Discussions must also not forget the importance of ambition across other aspects of the framework, specifically the need for a stronger implementation mechanism and concrete commitments on resource mobilisation.

**The only way is up. The zero draft must be the floor not the ceiling of ambition for COP15.**

# Detailed commentary on the Zero Draft Global Biodiversity Framework

## B. 2030 AND 2050 GOALS

### Goal a. The Ecosystems Goal

**a. No net loss by 2030 in the area and integrity of freshwater, marine and terrestrial ecosystems, and increases of at least [20%] by 2050, ensuring ecosystem resilience;**

**Recommended Text**

a. **Net gain** by 2030 in the area**, connectivity** and integrity of freshwater, marine and terrestrial **natural** ecosystems**, with no loss of key areas for biodiversity,** and increases of at least [20%] by 2050, ensuring ecosystem resilience **and maintenance of ecological processes**.

**Commentary: We are pleased to see this goal focusing on ecosystems, but have some suggestions to strengthen it as follows:**

- We support the use of a net outcomes goal here (following the specific recommendations below), addressing not only area and integrity but also connectivity of "**natural**" (as opposed to human-dominated or converted) ecosystems.
- We suggest an alternative of "**net gain**" as opposed to "no net loss" given that it is more positive and much more ambitious, and recognises the number of country and company commitments to net gain that already exist. This also clarifies the need to advance from just ecosystem retention to ecosystem retention and restoration. Net gain is also alluded to in Target 1.
- However, not all areas can be subject to a net outcomes approach, such as "**key areas for biodiversity**", which must be safeguarded through whichever means appropriate and subject to "**no loss**". Over the course of this UN Decade on Ecosystem Restoration real progress needs to be shown under this goal to put nature on a path to recovery.
- We recommend the inclusion of "**connectivity**" in this goal as another key element that is needed to ensure we 'bend the curve' of biodiversity loss and to ensure consistency with Target 1 where it is already included. It should be made clear in the associated guidance that this goal refers to subsets of all three types of ecosystems, freshwater, marine and terrestrial, and that these are not interchangeable or tradable.
- As recommended by the Convention on Migratory Species (CMS)[1], we suggestion reference be made to the need to not only ensure ecosystem resilience but also the wider "**maintenance of ecological processes**", which are critical for wide-ranging and migratory species as well as the delivery of ecosystem services such as water flow and nutrient cycling.
- Over the past 15 years there is has been a wealth of practical experience in **net outcomes** framing and implementation in national and sub-national policies and company strategies through the Mitigation Hierarchy and biodiversity offsetting. This experience has identified several key features of net outcome goals that need to be addressed to avoid unintended outcomes and for them to win broad societal acceptance: (1) A clearly specified baseline against which outcomes are assessed; (2) Recognition that there are situations where a net outcome approach may not be appropriate and guidance on how to identify these; (3) Clear guidance on appropriate "exchange rules" so that no net loss does not allow exchanges of gains and losses between biodiversity components that cannot be substituted; and (4) A clearly defined time horizon for accrual of any compensatory gains required to deliver a net outcome.
- As for other goals and targets, where the edits above do not wholly address these issues these should be clarified in accompanying **guidance**, agreed alongside the final wording of the goal.

[1] UNEP/CMS/COP13/Doc.17/Add.2/Annex 1: https://www.cms.int/sites/default/files/document/cms_cop13_doc.17_add2_cms-contribution-to-post-2020-framework_e_0.pdf

In the monitoring framework for this goal, under "Change in ecosystem integrity, resilience and degradation", we think it is important to include indicators of trends in population abundance and extinction risk of habitat specialist species as these are useful proxies for ecosystem degradation. We recommend specifically: Wild Bird Index and Red List Index, both of which can be disaggregated to specialists, as well as Red List Indices for terrestrial, freshwater and marine species, and potentially for species dependent on key ecosystem types such as forests, wetlands and coasts. Similarly, under "Change in ecosystem connectivity and fragmentation" (which currently lacks a suggested indicator), we propose a Red List Index, Wild Bird Index and/or Living Planet Index of migratory species as indicators of ecological connectivity.

## Goal b. The Species Goal

**b. The percentage of species threatened with extinction is reduced by [X%] and the abundance of species has increased on average by [X%] by 2030 and by [X%] by 2050**

Recommended Text

b. **Species extinctions are halted from 2020, the overall risk of species' extinctions** is reduced by **20% by 2030 and to zero by 2050, and the average population** abundance of **native** species **is** increased by **20%** by 2030 and **60%** by 2050.

**Commentary:** We welcome the high ambition and prominence of a 2030 goal to increase the population abundance of species and tackle extinction risk. To further improve this goal, we suggest the following modifications.

- Firstly, we think it is important to retain the element of Aichi Target 12 on preventing extinctions, so propose that "**species extinctions are halted from 2020**" (i.e. from now). We failed to meet this aim during 2010-2020, and need to reiterate it as an objective in the post-2020 framework, noting also that extinctions have considerable public resonance.
- Secondly, we find the formulation "The percentage of species threatened with extinction is reduced" problematic because it is rather insensitive, as it is binary – species are either threatened or not. Furthermore, the percentage of threatened species will change if more species are assessed from groups that are more or less threatened, or if improved knowledge alters our understanding of the degree of threat, without reflecting genuine success or failure in making progress to the target. Finally, the percentage of threatened species could be reduced simply by letting species go extinct. We therefore propose instead the wording "**the overall risk of species' extinctions is reduced by 20% by 2030**". This can be measured using the Red List Index, which factors out non-genuine changes in status resulting from improved knowledge and taxonomic revision, and is already used to report on progress to SDG15. A reduction in the overall risk of species' extinctions would equate to the value of the Red List Index going up by 20%. The aim by 2050 ought to be that no species are threatened and the Red List Index value increases to 1.0.
- Thirdly, the last clause refers to "abundance of species" which implies the number of species, whereas what is meant is the "**average** population abundance". "**Native** species" should be specified as the Goal should not incentivise or reward increases in population abundance of invasive alien species. Progress could be measured using the Living Planet Index, which has declined by 60% since 1970, therefore we suggest the aim should be to recover populations to their 1970 baseline (i.e. increasing "**60% by 2050"** from 2020), with "**20% by 2030"** being a potential milestone to achieve that.

In the monitoring framework for this goal we recommend:

- Changing "Number of species extinctions (birds and mammals)" to "Number of species becoming extinct or qualifying as Critically Endangered (birds and mammals)" as this is a more sensitive metric

given time lags in detecting and documenting extinctions, and noting that Critically Endangered can be equated to functionally extinct for these purposes.
- Append "owing to conservation actions" after "Number of extinctions prevented", to aid clarity
- Adding a supplementary indicator to measure progress towards this target: 'Percentage of threatened species that are improving in status", which would encompass not only those downlisted to lower categories of extinction risk on the IUCN Red List since 2020 for genuine reasons (as opposed to improved knowledge or revised taxonomy), but would also include threatened species that have increasing population trends or expanding ranges.
- Clarifying by adding "i.e. extinction risk" after "Change in conservation status".
- Adding "Wild Bird Index" as another indicator for measuring "Change in species abundance".

## Goal c. The Goal on Genetic Diversity

**c. Genetic diversity is maintained or enhanced on average by 2030, and for [90%] of species by 2050**

**Recommended Text**

c. Genetic diversity **of wild and domestic species** is maintained or enhanced on average by 2030, and for [90%] of species by 2050.

**Commentary:** To be more explicit about what aspects of genetic diversity are within the scope of this goal, we have suggested the addition of "**wild and domestic species"**.

## Goal d: The Ecosystem Services Goal or "nature's contributions to people"

**d. Nature provides benefits to people contributing to:**

i. **Improvements in nutrition for at least [X million] people by 2030 and [Y million] by 2050;**
ii. **Improvements in sustainable access to safe and drinkable water for at least [X million] people, by 2030 and [Y million] by 2050;**
iii. **Improvements in resilience to natural disasters for at least [X million] people by 2030 and [Y million] by 2050;**
iv. **At least [30%] of efforts to achieve the targets of the Paris Agreement in 2030 and 2050.**

**Recommended Text**

d. Nature provides **sustainable** benefits to people contributing to:

i. **Food security and** nutrition **through sustainable and resilient food systems** for at least [X million] people by 2030 and [Y million] by 2050;
ii. **Water security** and improvements in sustainable access to safe and drinkable water for at least [X million] people by 2030 and [Y million] by 2050;
iii. Improvements in resilience to **climate change and** natural disasters **through ecosystem conservation and restoration, ecosystem-based adaptation and adequate land use planning and enforcement** for at least [X million] people by 2030 and [Y million] by 2050;
iv. At least 30% of efforts to achieve the **climate change mitigation** targets of the Paris Agreement in 2030 and 2050 **through biodiversity-inclusive nature-based solutions, in particular conservation, reduced loss and degradation, and restoration of natural ecosystems.**

**Commentary:** We feel a goal focused on nature's contributions to people is important to include here. The headline target text "nature provides benefits to people" needs to be worded in a way that refers to the importance of biodiversity in relation to ecosystem services. The addition of "**sustainable**" is essential, as it

frames the goal away from potentially overexploiting nature. While we welcome this goal highlighting the connections between nature and people, we are concerned that developing targets for the number of people benefitting introduces disparity in the level of detail for this goal versus the others, and overstates the role of this convention; there is substantial detail on this in the SDGs. We would recommend that where possible these sub-goals are better connected to the SDGs or directly quote/ re-state/ expand on the relevant SDG specifically to avoid confusion. We welcome the focus on efforts to achieve the targets of the Paris Agreement, as increased awareness on the interlinkages between climate and biodiversity is imperative, but feel this could be better split up into "**ecosystem-based adaptation"** (under sub-goal iii) and "**climate change mitigation**" (under sub-goal iv) elements, as per the edits above. We would also specify the means of achieving at least 30% of efforts by 2030, through the addition of the term "**biodiversity-inclusive nature-based solutions"** and examples of **priority nature-based solutions**; the term "biodiversity-inclusive" matches the wording used elsewhere (in Target 13 and proposed for Target 1).

### Goal e: The Benefit Sharing Goal

**e. Benefit Sharing**
**The benefits shared fairly and equitably, from the use of genetic resources and associated traditional knowledge have increased by [X] by 2030 and reached [X] by 2050.**

**Recommended Text**

(e) The benefits shared fairly and equitably **by providers and broader society** from the use of genetic resources and associated traditional knowledge, **including from the increase in the availability of new cultivars and breeds and new biotechnology products with application of biosafety rules,** have increased by [**100%**] by 2030 and **continue an exponential annual increase of at least [10%]** by 2050.

**Commentary:** We support this goal as we feel the goals need to address all three objectives of the Convention. However, we have provided text recommendations in order to add clarity to the intention of the goal, including the need to benefit "**providers as well as broader society**". Linkages must be made to **SDG 2.5** which addresses "the genetic diversity of seeds, cultivated plants and farmed and domesticated animals and their related wild species" and the "fair and equitable sharing of benefits arising from the utilization of genetic resources and associated traditional knowledge", and expires in 2020.

## C. 2030 MISSION

**To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people**

**Recommended Text**

**Through** urgent action across society **reverse biodiversity loss and put nature** on a path to recovery for the benefit of planet and people.

**Commentary:** We are pleased to see that the Mission in this zero draft is now more communicable, talks directly about urgency and action, and is centred around the need to put nature on a path to recovery by 2030, which we feel are all key elements to include. It is in line with 'bending the curve' theories and with the narrative of the UN Decade on Ecosystem Restoration. While it could be stronger, it is better from a communication perspective than previous suggestions. We have however re-orientated the sentence to make the object to "**reverse biodiversity loss and put nature** on a path to recovery", "**through** urgent action", rather than the taking of action itself being the objective – as this should be a means to an end.

We should also be explicitly aiming to "**reverse"** biodiversity loss by 2030. One major concern is the contradictory footnote text which states that we want to see "stabilisation in the rate of loss" – this could be interpreted as just going from accelerating loss to steady loss which is highly problematic. It also has a caveat "recognizing that completely halting the loss of ecosystems, species and genetic diversity is not possible by 2030", while above it has a goal for "No net loss by 2030 in the area and integrity of …ecosystems". This is contradictory and is a "step back" from the 2020 ambition – which is already supposed to have halted the loss of biodiversity. Science shows that if we take appropriate and truly "transformational" actions, halting the loss (and even beginning recovery) is possible by 2030[2].

Because the Mission proposal is not directly "measurable" in its wording, the real impact potential comes from the five underpinning 2030 goals – they must be specific, measurable, and ambitious enough to act as the key aims for 2030. Five may seem like a lot, but they articulate the key parts of the framework that are "upfront" and outcome-orientated, and if we collectively work towards them then this is positive.

### Apex goal

In addition to the five goals, as for the Paris Agreement on climate we recommend that the Mission be complemented and strengthened by an apex goal to act as a simple, communicable metric of overall progress towards the achievement of the post-2020 global biodiversity framework by 2030. BirdLife has been working with a group of other organisations to formulate a proposal for a science-based apex goal which we hope will be presented before WG2020-2.

## D. 2030 ACTION TARGETS

The Framework has 20 action-oriented targets for 2030 which, if achieved, will contribute to the outcome-oriented goals for 2030 and 2050. Actions to reach these targets should be implemented consistently and in harmony with the Convention on Biological Diversity and other relevant international obligations, taking into account national socioeconomic conditions.

**(a) Reducing threats to biodiversity**

**1. Retain and restore freshwater, marine and terrestrial ecosystems, increasing by at least [50%] the land and sea area under comprehensive spatial planning addressing land/sea use change, achieving by 2030 a net increase in area, connectivity and integrity and retaining existing intact areas and wilderness.**

**Recommended Text**

1. Retain and restore freshwater, marine and terrestrial **natural** ecosystems, increasing **to 100%** the area **of each** under comprehensive**, biodiversity-inclusive** spatial planning, retaining existing intact areas and **key areas for biodiversity and restoring 50% of degraded ecosystems to achieve** by 2030 a net increase in area, connectivity and integrity.

**Commentary**: We propose the following modifications to improve this target:

- It is important to specify "**natural"** ecosystems specifically, as restoring and increasing the area of urban or converted ecosystems is counterproductive (as per comments on Goal 1).
- "Increasing by 50%" is unhelpful as this could entail increases that are small in magnitude if the baseline is low. Meeting the Mission and Goals will require effective spatial planning to cover **100% of natural ecosystems**.
- The wording of "comprehensive spatial planning addressing land/sea use change" is very weak and neutral. Comprehensive spatial planning can be conducted without being done in a biodiversity/nature positive way. It is preferable to specify that spatial planning must be "**biodiversity-inclusive**". It is important that such planning be done at an ecologically-relevant scale.

[2] Mace et al. 2018 Bending the curve of biodiversity loss. Nature Sustainability 1: 448-451.

- Biodiversity-inclusive mirrors the language used in proposed **Target 13**, which also includes reference to integrating biodiversity values into national and local planning; these targets are related and efforts to deliver them should be coordinated.
- As with Goal A, the focus on "integrity" (as used in the Paris Agreement) and "intact areas" is good but needs an effective working definition and indicators. "Wilderness" is essentially encompassed within these concepts so we propose removing this term.
- It is important to link this area-based target to **Target 2**, and ensure that spatial planning not only focuses on the retention of intact areas but also of "**key areas for biodiversity"**, and enhances their long-term resilience by placing them at the centre of ecosystem-based conservation.
- While restoration is mentioned in the first clause, we think it is helpful to provide a quantitative target for this and propose "**50% of degraded ecosystems**." It is important that this restoration is focused wherever possible around existing areas of importance for biodiversity and ecosystem services in order to facilitate natural regeneration and restore ecological connectivity and ecosystem resilience.
- Connectivity, in this context, should follow the definition of "**ecological connectivity**" as recently determined by the Convention of Migratory Species[3]:

**"Ecological Connectivity is the unimpeded movement of species and the flow of natural processes that sustain life on Earth".**

- Ensuring connectivity and integrity often requires an aspect of international cooperation which is so far absent from the target, elements and indicators; we therefore propose the addition of "**at an ecologically-relevant scale**" to ensure that planning is conducted at whatever scale is necessary, including, for example, beyond national boundaries at regional or flyway-scale.

In the monitoring framework for this target, under "Rate of habitat degradation", we recommend adding indicators of trends in population abundance and extinction risk of habitat specialist species as these are useful proxies for ecosystem degradation. We recommend specifically: Wild Bird Index (habitat specialists) and Red List Index (habitat specialists), as well as Red List Indices for terrestrial, freshwater & marine species.

**2. Protect sites of particular importance for biodiversity through protected areas and other effective area-based conservation measures, by 2030 covering at least [60%] of such sites and at least [30%] of land and sea areas with at least [10%] under strict protection.**

**Recommended Text**

2. **Effectively conserve, restore, and document the value of all key biodiversity areas and other** sites of particular importance for biodiversity, including all Key Biodiversity Areas, through **connected and integrated networks of** protected areas and other effective area-based conservation measures, by 2030 covering at least [**100**%] of such sites and at least [30%] of **all freshwater, marine and terrestrial ecosystems**.

**Commentary**: We strongly support the shift in emphasis from protected areas as an end in themselves, to conservation of sites of particular importance for biodiversity (through means such as protected areas and OECMs). To strengthen this target, we propose the following modifications:

- Given the target calls for both protected areas and OECMs, we propose replacing the first word "Protect" with "**Effectively conserve**".
- We recommend that **Key Biodiversity Areas** (KBAs) should be specifically mentioned as a recognised global, site-scale network of areas of biodiversity importance; they have been identified bottom-up through nationally led processes, encompass all elements of biodiversity (including genes, species and ecosystems), foci of different prioritisation methods (threat, geographical restriction, integrity, ecological

[3] UNEP/CMS/COP13/Doc.17/Add.2/Annex 1: https://www.cms.int/sites/default/files/document/cms_cop13_doc.17_add2_cms-contribution-to-post-2020-framework_e_0.pdf

processes and irreplaceability) and encompass existing networks focused on particular subsets of biodiversity (e.g. Important Bird and Biodiversity Areas, Alliance for Zero Extinction sites etc.).

- Given that some important sites for biodiversity require restoration to recover the species and ecosystems to former levels, we think that it is important to include '**restore'** in the wording
- By '**value'** we mean the biodiversity elements (populations, ecosystems, and ecological processes) for which a site has been identified as being of importance, which should be kept in favourable condition.
- The target of covering 60% of sites of particular importance for biodiversity is far too low. Currently, 50% of the area of the world's 16,000 Key Biodiversity Areas are covered by protected areas, and preliminary results indicate that many unprotected sites are likely covered by OECMs (Donald et al 2019), so the proposed 60% coverage is already likely exceeded, and **100% is both achievable and necessary by 2030**.
- We are concerned about the mention of 10% under Strict Protection as it implies that other sites do not need effective protection, so suggest dropping this clause.
- Many additional sites are likely to qualify as KBAs for different taxonomic groups and ecosystems, and documenting these needs to be a focus of action over the coming 10 years to be sure we are placing protected areas and OECMs in the most important places. Hence we recommend including the word **'document'**.
- We recommend that the language here mirrors that for Goal A and Target 1 in ensuring representative coverage of **"freshwater, marine and terrestrial ecosystems"**, rather than using the vague reference to "land and sea areas".
- In order to effectively conserve wide-ranging and migratory species in particular, sites must be connected into networks and integrated into the wider landscape or seascape, so we suggest add in the term "**connected and integrated networks**" of protected areas and OECMs.

In the monitoring framework, we propose the following additions:

- Under 'Coverage and representivity' we propose adding the indicator 'Number of countries in which Key Biodiversity Area inventories have been updated using the Global KBA Standard', as a measure of progress towards documenting sites of particular importance for biodiversity
- Under 'Protected area management' we propose adding the indicator 'Proportion of Key Biodiversity Areas in favourable condition'.

In the guidance for this target, there should be reference to the need for investment in protected area management, given that many smaller nations are already struggling to manage and protect existing areas. Furthermore, reference to private sector commitment to 'do no harm' through the avoidance and governance of protected areas and OECMs would be an important step.

**3. Control all pathways for the introduction of invasive alien species, achieving by 2030 a [50%] reduction in the rate of new introductions, and eradicate or control invasive alien species to eliminate or reduce their impacts by 2030 in at least [50%] of priority sites.**

**Recommended Text**

*3.* Control all pathways for the introduction of invasive alien species, achieving by 2030 a [50%] reduction in the rate of new introductions, eradicate or control **priority** invasive alien species, to reduce their **impacts** by 2030, **including 100% of key areas for biodiversity, and 50% of all oceanic islands.**

**Commentary: We recommend the following modifications to strengthen the wording of this target:**

- We suggest that we should specify that such impacts should be addressed in all key areas for biodiversity (i.e. sites of significance for the global persistence of biodiversity) as this is essential if we are to meet Goal A.

- 'Priority sites' are not clearly defined, so we suggest referring oceanic islands in addition to all key areas for biodiversity. Invasive alien species have had particularly devastating impacts on oceanic islands, but are also often feasible to eradicate or control.

In the monitoring framework, we recommend the following additions:

- 'Change in the number of countries with biosecurity and rapid response measures in place to control introduction pathways, and establishments, operating at both regional (i.e. biosecurity cooperation and information sharing across nations), national (i.e. pathways of introduction to countries) and sub-national (i.e. pathways of introduction to islands, freshwater bodies and priority terrestrial and marine habitats).'
- Change in the **rate of establishment** of IAS as well as the rate of introductions; change in the rate of **successful** IAS eradications and **successful control programmes and biosecurity plan implementation;** change in the impact of IAS **on native habitats and species distribution/abundance**.
- Furthermore, the indicators should include both legislation and enforcement. The discussion in the elements about the number of countries with measures in place should specify these as **biosecurity** measures. The elements also need to specify a reduction in the rate of invasive alien species introductions, and an increase in the number of successful eradication attempts of invasive species (particularly on small islands with threatened endemic species). Therefore, the indicators should include **trends in the numbers of IAS establishment events**, **trends in the numbers of IAS establishment events compared to business-as-usual**, and **implementation of biosecurity plans.** This is because Biosecurity is never 100% effective and needs to be backed-up with an Early warning and rapid response (EWRR) capacity - establishment must be prevented, which means focusing beyond introductions alone. The intentional/unintentional distinction is functionally useful but is not a fundamental element of targets or measures. Better to focus on restoring and protecting islands and catchments as a priority, whether that is at national or sub-national level. The latter will be important in achieving adequate focus on important sites (e.g. Key Biodiversity Areas).

**4. Reduce by 2030 pollution from excess nutrients, biocides, plastic waste and other sources by at least [50%].**

**Recommended Text**

4. Reduce by 2030 **all types of pollutants [including excess nutrients, biocides, plastic waste and other marine debris, chemicals, noise and artificial light] in all freshwater, marine and terrestrial ecosystems and atmospheric environments** by at least [50%] **relative to 2020.**

**Commentary**: We support a 50% reduction in pollution, but there needs to be a baseline here. We suggest a baseline of 2020: "**relative to 2020**". We suggest "**all types of pollutants"** should be reduced, but would add additional pollutants if specific types are to be listed in the target itself, and it is important to recognise that in addition to plastic other materials are directly and indirectly responsible for harm to biodiversity, so would add "**and other marine debris"**.

Furthermore, we are concerned about the vague reference to the **"amount"** of pesticide use in the indicators; the "amount" used could be reduced but replaced with a lower amount of a pesticide with a higher toxic load. Therefore, the agreed measurement for the amount needs to account for the toxicity/toxic load of the pesticides (accounting for lethal dose and persistence in the environment) as well as the number of pesticide applications per hectare.

We also suggest adding a sub-target/element for ensuring that rigorous pre-approval pesticide test procedures are in place for wildlife and human health effects, which would reduce the prevalence of the most harmful chemicals. Finally, the wording of 'biocides' in the targets does not match with the elements, where only pesticides are highlighted in this area. If biocides are to be included, there need to be specific

sub-targets and indicators related to non-pesticide biocides (e.g. antibiotics). In terms of the change in trends in nitrogen waste elements, we suggest that it refers to achieving a full nutrient balance at farm level.

**5. Ensure by 2030 that the harvesting, trade and use of wild species, is legal and at sustainable levels.**

**Recommended Text**

5. By 2030 **all direct exploitation of** wild species **is sustainable,** legal **and governed by ecosystem-based approaches, impacts from** harvesting **are within safe ecological limits, overexploitation is avoided and carried out without detrimental impacts to non-target species.**

**Commentary**: According to the IPBES global assessment, use and exploitation of natural resources are amongst the 5 major threats to biodiversity. Harvesting or trade are ways in which use/exploitation can occur. So language should be adjusted accordingly in this target to reflect this.

The current language refers to harvest/use/trade being at sustainable level, therefore, not addressing, associated impacts on non-target species, for instance, through bycatch. These activities not only impact populations of the species used/harvest/traded, but others as well and should be conducted both in a sustainable way and at sustainable level. In addition, this target needs to ensure that sustainable use is done consistent with international commitments, with effective regulation, monitoring and enforcement mechanisms in place. There are good elements and indicators highlighted for this target in Annex B, but more could be done to draw out this element.

In the monitoring framework for this target, we welcome the inclusion of the various versions of the Red List Index, but note a minor typo: the erroneous inclusion of 'impacts of' before 'internationally traded species'.

**6. Contribute to climate change mitigation and adaptation and disaster risk reduction through nature-based solutions providing by 2030 [about 30%] [at least XXX MT $CO_2$=] of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity and food security.**

**Recommended Text**

6. Contribute to climate change mitigation and adaptation and disaster risk reduction through nature-based solutions providing by 2030 **at least** 30% of the mitigation effort needed to achieve the goals of the Paris Agreement, complementing stringent emission reductions, and avoiding negative impacts on biodiversity and food security.

**Commentary**: We strongly support this target. However, this use of the term 'nature-based solutions' needs to come alongside a **set of agreed principles** as to what good nature-based solutions look like. Broadly, such principles should include the following:

- They must not be a substitute for a rapid fossil fuel phase out.
- They must prioritise the protection and restoration of existing carbon-rich ecosystems and their key functions and biodiversity: not all climate actions support biodiversity and ecosystem integrity, as large scale plantation establishment and burning of forest biomass have an adverse impact on biodiversity and questionable positive impacts on climate change.
- They must recognise the key role of indigenous peoples and local communities.
- They must not harm biodiversity, indeed recognising that biodiversity plays a functional role in providing greater, more resilient and secure stores of carbon, as well as delivering associated co-benefits.

We are pleased that adaptation is included upfront in the target, however adaptation needs to be about how species and ecosystems can better adapt to climate change as well as how nature helps people adapt to a changing climate.

Given that the science is unclear as to the exact contribution of NBS to climate change, it is difficult to give an exact percentage of the amount of mitigation effort that should come from NbS. Indeed, the carbon stored in intact forests may be far higher than initially estimated, so 30% should be seen as a conservative figure. Given this, we suggest the addition of **"at least"** here.

We would like to see more language around 'future nature' given that we are on a climate change trajectory for a 2˚C warmer world. Our strategies for putting nature on a path to recovery should account for the future climate state.

Regarding the monitoring framework, the indicators for the amount of carbon stored in ecosystems should go beyond just REDD+ and include national inventories.

### Proposed additional target

**'Implement intensive management actions, both *in situ* and *ex situ* as required, for species whose continued survival depends on such actions, and whose recovery cannot be cannot be achieved solely through the implementation of Targets 1-6 above.'**

**Commentary:** We are concerned that to achieve Goal B, action targets 1-6 on reducing threats to biodiversity are insufficient to stop extinctions or reduce species extinction risks by 2030. Certain threats simply cannot be abated or reversed by 2030 – the time-lag in the system is too slow, for example the threats to corals from ocean warming and acidification. Furthermore, most of the species that are at risk of extinction before 2030 are now so rare that they need targeted recovery actions to avert extinctions, halt declines and increase populations. Such emergency actions include intensive on-the-ground management of threats, biocontrol, ex-situ conservation, assisted migration, technologies for local management of pH in marine systems, efforts to combat wildlife disease, etc. We therefore strongly recommend the addition of a target to promote such recovery actions for species that require them.

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

**7. Enhance the sustainable use of wild species providing, by 2030, benefits, including enhanced nutrition, food security and livelihoods for at least [X million] people, especially for the most vulnerable, and reduce human-wildlife conflict by [X%].**

**Recommended Text**

7. Enhance the **sustainability of the** use of **domestic and** wild species, **including local varieties and under-utilised species,** providing, by 2030, benefits, including enhanced nutrition, food security **and resilience** and livelihoods for at least [X million] people, especially for the most vulnerable, and reduce human-wildlife conflict by [X%].

**Commentary**: We are concerned that the phrasing "enhance the sustainable use" can be interpreted to mean to take more/increase the amount of extraction of wild species. This is also supported by the main measure used: increasing the number of people that benefit from the harvest of species. We suggest the above amendments to bring clarity to the intention of this target in relation to the sustainable use of species, as the current wording may fail to support the sustainability or legality of the resource use. Furthermore, reducing human-wildlife conflict seems to have been tacked on to the end of this goal,

and is poorly defined, especially in terms of how 'incidences of human-wildlife conflict' will be measured as an indicator.

**8. Conserve and enhance the sustainable use of biodiversity in agricultural and other managed ecosystems to support the productivity, sustainability and resilience of such systems, reducing by 2030 related productivity gaps by at least [50%].**

**Recommended Text**

8. Conserve and **ensure** the sustainable use of biodiversity in agricultural and other managed **freshwater, marine and terrestrial** ecosystems to support the productivity, sustainability and resilience of such systems **for food security and enhanced nutritional value**, reducing by 2030 related productivity **and sustainability** gaps by at least [50%].

**Commentary**: This target in its current form translates to 'sustainable intensification' which we see as a risk to biodiversity. We understand that this is an attempt to recognise the needs of developing countries, but it needs significant strengthening in order to ensure that it does not allow for/drive perverse outcomes. One should either use the term "enhance the *sustainability*, or "**ensure** the sustainable use", and we should reduce "**sustainability**" as well as productivity gaps. It is important to clearly focus on more than agricultural systems, including **marine and freshwater**, and link this target to improved **food security and nutrition** outcomes under Goal D. As such we recommend the above formulation to bring clarity to the intention of this target.

The elements about pollinators, soil health, natural pest controls, biologically-friendly agriculture and agricultural area under sustainable management fit with this reframing but are currently lost in the monitoring elements. We are supportive of the mention of integrated pest management and call for 100% of farms to use this, with pesticides being used as a last resort. It is important that effective regulation, monitoring, and enforcement mechanisms are developed are in line with international commitments on sustainable use.

**9. Enhance nature-based solutions contributing, by 2030, to clean water provision for at least [XXX million] people.**

**Recommended Text**

9. Enhance **biodiversity-inclusive** nature-based solutions**,** contributing, by 2030, to **provision of clean water and other benefits from nature** for at least [XXX million] people.

**Commentary**: This target's focus on clean water provision misses the broader application of nature-based solutions (NBS) – and the need for these to be "**biodiversity-inclusive**" - to deliver benefits for nature whilst delivering nature's benefits to people (i.e. ecosystem services). This target should be revised to make explicit the mutualistic relationship between delivering for nature whilst enhancing people's health, livelihoods and well-being, with regard to clean water, clean air, etc. As such it should be reframed to include the wider "**benefits from nature**" in addition to provision of clean water. Sub-targets and indicators relevant to a range of ecosystem services should be defined, as relevant to this broader definition of NBS, and linking to Target 6. Critically, a clear definition of 'nature-based solutions', with underpinning principles and guidance on how to apply them, is essential in order to ensure effective implementation.

The elements and indicators discussing the" 'number of people with access to sufficient amounts or quality of freshwater" are not directly attributed to nature-based solutions (NbS) – this number could increase due to other (technical infrastructure) inventions. The elements and indicators should more explicitly refer to NbS in order to avoid loopholes in the target, and the size of the role that NbS are to play should be quantified.

In the monitoring framework for this target, under "Change in the number of protected forested watershed, and inland water ecosystems essential for the provision of water", we suggest adding the SDG indicator 'Coverage by protected areas of important sites for mountain biodiversity'.

**10. Enhance the benefits of green spaces for health and well-being, especially for urban dwellers, increasing by 2030 the proportion of people with access to such spaces by at least [100%].**

**Recommended Text**

10. Enhance the benefits of **biodiverse** green spaces for **physical and mental** health and well-being, especially for urban dwellers, increasing by 2030 the proportion of people with access to such spaces by at least [100%].

**Commentary**: A "green space" does not necessarily benefit biodiversity. There needs to be a reference to "**biodiverse"** green spaces. This target could then have dual benefits: maximising the green space beneficial for biodiversity in urban areas, and enhancing both "**physical and mental**" health and well-being for people through having access to this space.

Note that this target could be aligned to **SDG 11.7**:

- 'By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities'

and the associated **SDG indicator 11.7.1**:

- Average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities

**11. Ensure that benefits from the utilization of genetic resources, and related traditional knowledge, are shared fairly and equitably, resulting by 2030 in an [X] increase in benefits.**

**Recommended Text**

11. Ensure that benefits from the utilization of genetic resources, and related traditional knowledge, are shared fairly and equitably, resulting by 2030 in an [X] increase in benefits **to providers and an increase in the availability of new cultivars and breeds and new biotechnology products with application of biosafety rules for the benefit of broader society.**

**Commentary**: The indicators for this target should more clearly express that the countries with the beneficial genetic resources and traditional knowledge should be the ones to receive monetary or other benefit. This is important not only for fair compensation, but because it acts as an additional case to protect the best sites for nature and as an incentive to fund good management and research.

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

**12. Reform incentives, eliminating the subsidies that are most harmful for biodiversity, ensuring by 2030 that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.**

**Recommended Text**

12. Reform incentives, eliminating the subsidies that are harmful for biodiversity **by 2025**, ensuring by 2030 that incentives, including public and private economic and regulatory incentives, are positive for biodiversity.

**Commentary**: The term "most" harmful for biodiversity is concerning as it is a weakening of the Aichi Targets and reduces the potential of this target to drive movement towards less environmentally destructive agriculture and fisheries, so we recommend its removal from the target text. It is important to monitor *all* subsidies and incentives not just the direct ones. Indirect subsidies and those which encourage consumption or influence supply chains also have impacts on biodiversity directly or through pollution/waste or increased consumption. Furthermore, the words "positive or neutral" should be replaced with just "**positive**" to make this target more ambitious. This target needs to be strong in order to drive meaningful change in Target 8. A stepped timeframe will ensure policy is in place and action started (e.g. "**by 2025**"), with results achieved and reported by 2030.

Note that this target could be aligned with **SDG 12C**:

- Rationalize inefficient fossil-fuel subsidies that encourage wasteful consumption by removing market distortions, in accordance with national circumstances, including by restructuring taxation and phasing out those harmful subsidies, where they exist, to reflect their environmental impacts, taking fully into account the specific needs and conditions of developing countries and minimizing the possible adverse impacts on their development in a manner that protects the poor and the affected communities

and its associated **SDG indicator 12.C.1**:

- Amount of fossil-fuel subsidies per unit of GDP (production and consumption) and as a proportion of total national expenditure on fossil fuels

**13. Integrate biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts, ensuring by 2030 that biodiversity values are mainstreamed across all sectors and that biodiversity-inclusive strategic environmental assessments and environmental impact assessments are comprehensively applied.**

**Recommended Text**

13. Integrate biodiversity values into **regional,** national and local planning, development processes, poverty reduction strategies and accounts, **with mechanisms in place by 2025**, ensuring by 2030 that biodiversity values are mainstreamed across all sectors and that biodiversity-inclusive strategic environmental assessments and environmental impact assessments **using a conservation-enabling hierarchy approach**, are comprehensively applied.

**Commentary**: This integration needs to be done in ways that give biodiversity meaningful weight in environmental impact assessments and strategic environmental assessments, across. Such planning and implementation should also be done at ecologically-relevant scale, extending beyond national borders for example to cover an expanse of intact forest, a river, a coast or a flyway. The conservation hierarchy approach is an adaptation of the Mitigation Hierarchy to ensure outcomes beyond the project level. To ensure full and effective implementation mechanisms to support this targets implementation must be in place by 2025.

Proposed indicators for revised target 13 could include:

- Proportion of national territory covered by current biodiversity-inclusive strategic environmental assessment (or equivalent comprehensive spatial planning) using a conservation-enabling hierarchy approach
- Number of governments / subnational governments (a) with public procurement policies and action plans for achieving at least no net loss or net gain of biodiversity and (b) achieving at least no net loss or net gain of biodiversity through these policies and plans
- Number of sector-wide policies in place for achieving no net loss or net gain of biodiversity

Alongside a proposed revision to **SDG indicator 12.1.1**, reporting against **SDG 12.1**:

- Number of countries with sustainable consumption and production (SCP) national action plans **incorporating biodiversity considerations** or SCP mainstreamed as a priority or a target into national policies

**14. Reform economic sectors towards sustainable practices, including along their national and transnational supply chains, achieving by 2030 a reduction of at least [50%] in negative impacts on biodiversity.**

**Recommended Text**

14. **Require all actors (including economic sectors, companies, financial institutions, cities, and local governments) first to avoid and then to minimise their negative impacts on biodiversity by 2025, to take actions to restore biodiversity, and to** reform their national and transnational **value so that** by 2030 **their actions result in no net loss or net gain o**f biodiversity against a 2020 baseline.

**Commentary**: This target would be better placed in the first section as the ecological footprint of economic sectors is a key threat to biodiversity. Furthermore, in the monitoring elements, the 'change in the number of private-sector organisations' needs to be a proportion and reflect size, not number of individual businesses. The metric needs to have meaning, for example, provide evidence in annual reporting and undertake natural capital accounting.

Proposed indicators for revised target 14 could include:
- Number of countries having policies requiring no net loss or net gain of biodiversity and reporting for companies listed or operating in their territories
- Number of financial institutions using biodiversity metrics to guide investment and risk management around a goal of no net loss or net gain of biodiversity
- Number of companies that have set and implemented targets for achieving no net loss or net gain of biodiversity, taking into consideration biodiversity impacts across their value chains
- Number of sectoral policies in place for achieving no net loss or net gain of biodiversity
- Number of governments / subnational governments (a) with public procurement policies and action plans for achieving at least no net loss or net gain of biodiversity and (b) achieving at least no net loss or net gain of biodiversity through these policies and plans

Alongside a proposed revision to **SDG indicator 12.6.1**, reporting against **SDG 12.6**:
- Number of companies publishing sustainability reports **including biodiversity information**

**15. Resources, including capacity-building, for implementing the framework have increased from all sources so that by 2030 resources have increased by [X%] and are commensurate with the ambition of the targets of the framework.**

**Recommended Text**

15. Resources, including capacity-building, for implementing the framework have increased from all sources **with these mechanisms established by 2025** so that by 2030 resources have increased by [X%] and are commensurate with the ambition of the targets of the framework.

**Commentary**: We would prefer to see an explicit target for financial resources. Here, financial resources could decline but be offset by increases in other resources like capacity building. Ensuring sufficient financial resources are mobilised to support efficient and effective implementation of all targets is critical, so this requirement needs more prominence. The indicators should also include a metric on private finance. Furthermore, it is crucial that these resource flows and expenditures are effective. It shouldn't just be about how much resource mobilisation there is but about how effective this resourcing is.

**16. Establish and implement measures in all countries by 2030 to prevent potential adverse impacts of biotechnology on biodiversity.**

**Recommended Text**

16. Establish and implement measures in all countries **by 2025** to prevent potential adverse impacts of biotechnology on biodiversity.

**Commentary:** The phrasing "establish and implement measures" is very weak, and the measures must be in place well before 2030 in order to achieve and report results by 2030 (e.g. "**by 2025**").

**17. People everywhere take measurable steps towards sustainable consumption and lifestyles, taking into account individual and national cultural and socioeconomic conditions, achieving by 2030 just and sustainable consumption levels.**

**Recommended Text**

17. People, **industries, retailers, financial institutions and governments** everywhere take measurable steps **by 2025** towards sustainable consumption and lifestyles, taking into account individual and national cultural and socioeconomic conditions, achieving by 2030 just and sustainable consumption levels, **reducing production of waste and residues by 50%.**

**Commentary:** We are concerned that simply asking "people everywhere to tackle consumption patterns "taking into account individual conditions" could be interpreted as a way for those in over-consuming, developed countries to justify continuing business-as-usual consumption and lifestyles. As such, we suggest **listing other relevant actors** to clarify responsibility, and, the inclusion of a milestone to ensure measurable steps are taken "**by 2025**". This has the potential to be wrapped into an ecological footprint and supply/value chain target. Any target concerning sustainable consumption should be explicitly linked and aligned to **SDG Goal 12**[4] and indicators associated with it.

**18. Promote education and the generation, sharing and use of knowledge relating to biodiversity, in the case of the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior and informed consent, ensuring by 2030 that all decision makers have access to reliable and up-to-date information for the effective management of biodiversity.**

**Recommended Text**

18. Promote education and the generation, sharing and use of knowledge relating to biodiversity, in the case of the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior and informed consent **by 2025**, ensuring by 2030 that all decision makers have access to reliable and up to date information for the effective management of biodiversity.

**Commentary:** The addition of a milestone to 2025 ensures that this first clause and its related activities are actioned "**by 2025**", with all decision-makers having access to the outputs by 2030 to inform the effective management of biodiversity. The final clause of Target 18 also needs better clarification, as it is not only the decision-makers but also the indigenous peoples and local communities (unless they are assumed to be part of decision-makers in the text) who should also have access to such information. In other words, it is important to ensure two-way flow and equitable access of information.

[4] SDG Goal 12: Ensure sustainable consumption and production is about promoting resource and energy efficiency, sustainable infrastructure, and providing access to basic services, green and decent jobs and a better quality of life for all.

**19. Promote the full and effective participation of indigenous peoples and local communities, and of women and girls as well as youth, in decision-making related to the conservation and sustainable use of biodiversity, ensuring by 2030 equitable participation and rights over relevant resources.**

**Recommended Text**

19. Promote the full and effective participation of indigenous peoples and local communities, and of women and girls as well as youth, in decision-making related to the conservation and sustainable use of biodiversity **by 2025**, ensuring by 2030 equitable participation and rights over relevant resources.

**Commentary:** The addition of a milestone to 2025 ensures that promotion of full and effective participation is actioned "**by 2025**", with equitable participation and rights over relevant resources ensured by 2030, avoiding parties delaying implementation to 2030. "Full and effective participation" needs to be expanded and clarified further (e.g. different levels of participation - from informing to empowering). In particular, it is important to stress that indigenous peoples, local communities, women, girls and youths get to participate right from the outset of decision-making processes, rather than just asked to validate the already made decisions.

**20. Foster diverse visions of good quality of life and unleash values of responsibility, to effect by 2030 new social norms for sustainability.**

**Recommended Text**

20. Foster **by 2025** diverse visions of good quality of life and unleash values of responsibility, to effect by 2030 new social norms for sustainability.

**Commentary**: We have made limited changes to this target's language except with respect to inserting a **2025 milestone** to monitor progress. This is due to the target's current phrasing which is unnecessarily confusing, and there is no obvious connection in the wording on how it benefits the environment. If it is about biodiversity awareness, engagement and action (as suggested in the monitoring elements and indicators) then it should be worded as such.

## E. IMPLEMENTATION SUPPORT MECHANISMS

Proposed additions:

**13 (e) Clear guidance and action plans, with timelines for milestones which map a pathway to change by 2030, to enable all actors to contribute towards achieving the transformational change needed and to demonstrate that their impact on biodiversity is net positive from 2030.**

**13 (f) Effective periodic review to assess implementation so as to promote reduction of mismatches between the levels of ambition and implementation of national goals and targets versus the adopted global goals and targets**

**Commentary**: A large part of the reason for the failure to meet the majority of the Aichi Targets is the lack of a clear implementation plan to achieve them. We therefore suggest adding two further implementation support mechanisms to the list in section E to provide i) clear guidance and actions plans and ii) a mechanism for the effective periodic review to assess implementation.

International cooperation is fundamental in achieving full and effective implementation, and, further in fostering the enabling conditions critical to achieving this, therefore we suggest adding reference to international cooperation in both paragraphs 13 and 14.