Civil Society Alliance for Biodiversity Conservation
Comments on CBD/WG2020/2/3

To the CBD Secretariat:

We, the Civil Society Alliance for Biodiversity Conservation composed by a number of Chinese CSOs, would like to thank the OEWG Co-Chairs for preparing the zero draft of the post-2020 global biodiversity framework (CBD/WG2020/2/3, "the zero draft"), which helps to advance discussions on concrete matters in the OEWG's second and future meetings. After group consultations, we jointly provide the following views on the zero draft.

1. We agree that the zero draft seems **less ambitious** than it would need to be to protect and restore nature through "**transformative change**", as specified in IPBES Global Assessment Report. We believe that the 2030 mission should be set at a higher level "to **stop and reverse the decline of biodiversity** and put biodiversity on a path to recovery by 2030." Further, this mission should be set to achieve a balance between ambition and practicability using various measures, including addressing the drivers of biodiversity loss and preparing action plans for key industries. We also propose an addition of descriptions of additional climate-change-imposed risks into the background section of the Draft to highlight the urgency of transformation.

2. We note that the zero draft sets two types of goals: long-term goals and action-oriented targets. This division is an effective way to promote specific discussions. In the previous discussion on the area percentage targets, we noted that action targets are a powerful tool to support the implementation of policies, but these targets (e.g. X% of

the area) may help urge the output of the policies and not ensure that effective biodiversity conservation will be achieved. Therefore, **quantifiable targets for assessing the effects of policies** are also needed to help monitor the progress of long-term actions. In addition, we suggest that the **long-term goals be focused on actions for 2030**, starting from now, rather than for two timeframes of 2030 and 2050 respectively. Setting goals for different timeframes, as shown in the zero draft, would take more negotiation time and resources, both of which are already very limited, and drag down the negotiation progress.

3. We note that the zero draft refers to the need for unprecedented collaboration and all-inclusive civil participation to initiate broad changes within the 2050 vision. Particularly in the sections “tools and solutions for implementation and mainstreaming”, “enabling conditions”, and “responsibility and transparency” , much emphasis is attached to the rights and actions of indigenous peoples and local communities, civil society and the private sector. Their contributions are essential to ensure the achievement of the goals. However, it is risky to achieve the target of **all-inclusive civil participation in biodiversity conservation** and mainstreaming as it is missed in the zero draft on how to recognize and incorporate the contributions and actions of non-state actors, particularly civil society, indigenous peoples and local communities and the private sector. We suggest the contributions of non-state actors to biodiversity conservation be identified and supported, including those of civil society, communities, and the private sector

4. Considering the characteristics of **the ocean**, we believe that marine connectivity

makes regional or global cooperation crucial for marine conservation. We think that references to exchanges and cooperation with other international organizations and multilateral environmental conventions, as we note in the zero draft, particularly in the sections “theory of change”, “enabling conditions”, “responsibility and transparency”, and “outreach, awareness, and uptake”, are very beneficial. We also hope that the zero draft will provide an in-depth definition of "ocean" and the responsibilities and obligations each country assumes within its jurisdiction, and that the Framework will provide measures to urge cooperation among the parties in the conservation and sustainable use of biodiversity in areas beyond national jurisdiction, to assess the impacts of fisheries, shipping and other marine activities on the marine ecosystem, and to minimize these impacts.

5. We note that the issues of implementation mechanisms, resource mobilization, responsibility and transparency are still being discussed and are not specified in the zero draft. We call for a matching implementation support mechanism related to the ambitious goals to ensure the effective implementation of the Framework. China’s “ecological civilization” concept has become a theme of COP15, involving a batch of reform and action-oriented policies across the country, such as “ecological red lining” and “environmental monitoring and inspection”. This should be referential as a prototype of implementation mechanisms under the Framework.

Based on our experience in China, we hereby propose our views as follows:

Original Text	Proposed changes (proposed new text in Bold and delete in ~~strikethrough~~).	Background and Rational of the changes
B. 2030 and 2050 Goals	B. 2030 ~~and 2050~~ Goals	Setting goals separately for different timeframes does NOT help the effective use of negotiation resources.
10.The Framework has five long-term goals for 2050 related to the 2050 Vision for Biodiversity. Each of these goals has an associated outcome for 2030.[11] The five goals are:	10.The Framework has five long-term goals for ~~2050~~ **2030** related to the ~~2050~~ **2030** ~~Vision~~ **Mission** for Biodiversity. Each of these goals has an associated outcome for 2030.[11] The five goals are:	
(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;	(a) No net loss by 2030 in the area and integrity of freshwater, ~~marine~~ **sea shore, sea island** and terrestrial ecosystems~~, and increases of at least [20%] by 2050~~, **maintaining healthy ecological processes**, ensuring ecosystem resilience;	As an assessment indicator, "no net loss in the area and integrity" is quite impractical to measure given the fluidity and volume of the marine ecosystem. There is no concept of "increase" relating to the area and integrity of the marine ecosystem. Therefore, we propose to change "marine" to "sea shore and sea island ecosystems" and to represent offshore conservation with other indicators, such as healthy ecosystem functions restored by establishing and maintaining marine protected areas and ecological restoring measures. For the freshwater ecosystem, it is very important to ensure the health of eco-hydrological processes.
(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.	(b) The percentage of species threatened with extinction is reduced by [X%], **the percentage of threatened species is reduced by [X%],** ~~and the abundance of species has increased on average by [X%] by 2030 and by [X%] by 2050~~, **stopping human-**	Any reduced percentage of species threatened with extinction depends on success in "stopping human-induced extinction of known endangered species", because species extinction itself is related to such percentage reduction and therefore causes ambiguity in the way to achieve the goal.

	induced extinction of known endangered species.	In addition to the extreme scenario of threats, the human-induced endangerment of species should also be greatly reduced to reflect the general status and achievements of species conservation.
C. 2030 Mission		
11. The 2030 Mission for this framework is: To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people.	11. The 2030 Mission for this framework is: ~~To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people~~ **To halt and reverse the decline of biodiversity and put biodiversity on a path to recovery by 2030**.	Be more ambitious to achieve transformation.
D. 2030 action targets		
(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.	1. **Effectively r**~~R~~etain and restore freshwater, marine and terrestrial ecosystems, **achieving ocean and land integration**, increasing ~~by at least [50%] all~~ the land and sea area under comprehensive spatial planning, **strictly forbidding arbitrary** ~~addressing~~ land/sea use change, **conducting ecological restoration planning based on comprehensive spatial planning**, achieving by 2030 a net increase in area, connectivity and integrity and retaining existing intact areas and wilderness, **maintaining healthy and steady ecological processes (particularly environmental flows in the freshwater ecosystem)**.	To effectively protect freshwater, marine and terrestrial ecosystems, attention should be paid to their interconnectedness, integrity and systematicity. Measures should be taken to establish a land and sea integrated conservation mechanism for land and sea coordination. A rigorous implementation of comprehensive spatial planning tools, including “ecological cordons”, can solve the problem of “land use change”, a main driver of biodiversity loss. At the same time, it is also necessary to conduct ecological restoration planning and implementation for the 2030 mission. In recent years China has taken various helpful measures to conduct land planning nationwide and forbid any change to predetermined land use.

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.	2. **Based on the best scientific information currently available and the pre-warning principles, establish a protected area system, strictly p~~P~~**rotect sites of particular importance for biodiversity through protected areas and other effective area-based conservation measures **to ensure the effective conservation and sustainable use of other ecosystem functions**, by 2030 covering ~~at least [60%] of such sites and at least~~ [30%] of land and sea areas **(within and out of national jurisdiction)** ~~with at least [10%] under strict protection~~. **Acknowledging the contribution of private and community protected areas to the national protected area system, and providing policy and financial support.**	Considering that the design of this action framework is based on actions at the national level, and that the marine and terrestrial ecosystems are different in that 60% of the oceans are out of national jurisdiction, it is necessary to clearly define the concept of oceans in the action targets and specify that the ocean as referred to in the Draft includes coastlines, islands and sea areas, which include areas within and out of national jurisdiction. In addition to the area of protected sites, we should also increase the effectiveness of protective measures through scientific and effective management. Further, the rights and traditions of indigenous people should be respected and multi-stakeholder participation should be encouraged.
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.	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 **all key areas for biodiversity** ~~at least [50%] of priority sites~~.	China is one of the countries most invaded by alien species in the world, and the prevention and control of invasive alien species has been included in its 13th Five-Year Plan for Environmental Protection. However, the investigation, assessment and control measures for invasive alien species are not consistent with the extent of such threats, with more efforts needed in terms of investment and implementation.

4. Reduce by 2030, pollution from excess nutrients, biocides, plastic waste and other sources by at least [50%].	4. **Fundamentally improve by 2030, the quality of the ecological environment, eliminating the harmful effects of pollution on ecosystem services and biodiversity, reducing the use of pesticides and chemical fertilizers by 50%, reducing the effects of light and noise pollution on biodiversity, fully controlling plastic pollution and eutrophication.** ~~Reduce by 2030, pollution from excess nutrients, biocides, plastic waste and other sources by at least [50%].~~ **Establish by 2030, a green recycling and low-carbon industrial system, significantly reducing per capita material consumption, taking various measures, such as source prevention, comprehensive treatment, and recycling, to reduce the amount of solid waste by 50%, fully promoting a "waste-free city".**	The amount of chemical fertilizers and pesticides used may be maintained or even reduced through various measures, such as promoting organic fertilizers, preventing and controlling crop diseases and insect pests in an environmentally friendly way. China has made some progress in this regard. Scaling-up is possible through international cooperation and other means. Efforts should be made to build a recycling and low-carbon industrial system to improve the rate of resource production and the recycling rate of major wastes. Based on first-hand experience, a "waste-free city" may be promoted on a broad scale, so that pollution from plastic waste can be effectively controlled by 2030 and zero emission to natural environments can be achieved.
5. Ensure by 2030 that the harvesting, trade and use of wild species, is legal and at sustainable levels.	5. **Improve legal, standardization, and tracking systems, e**~~E~~nsure by 2030 that the harvesting, trade and use of wild species, is legal and at sustainable levels, **strengthening law enforcement and measures against international illegal trade of wild species**.	Law enforcement on international trade is also particularly important to ensure the legality, sustainability and traceability of the harvest, international trade and use of wild species by 2030, and to ensure that these activities will not endanger the survival of wild species.
6. Contribute to climate change mitigation and adaptation and disaster risk reduction through nature-based solutions	6. Contribute to **effective biodiversity conservation**, climate change mitigation and adaptation **to enhance**	Nature-based solutions should be elevated to address the issues of ecological security, including food security.

providing by 2030 [about 30%] [at least XXX MT CO2=] 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.	**resource protection and** disaster risk reduction **and to ensure the health and security of ecosystem functions** through nature-based solutions providing by 2030 [about 30%] [at least XXX MT CO2=] 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.	
(b) Meeting people's needs through enhanced use and benefit-sharing	(b) Meeting people's needs through reasonable use and benefit-sharing	Not all "enhanced uses" are "reasonable". The concept of reasonable use should include equality and efficiency in addition to sustainability.
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%].	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%].~~ **By 2030, ensure that all people, especially the poor and disadvantaged, have equal access to sustainable use of wild species and their benefits, including rights to more nutrition, food security and livelihood.** **Establish and improve eco-compensation and insurance systems for wild animal attacks to reduce human-wildlife conflicts.**	The expression "enhance the sustainable use of wild species…" contains ambiguities that encourage the utilization of wildlife. The number of people who have benefited from the sustainable use of wild species is difficult to measure by itself. We suggest changing it to a new expression. There are many pathways to address human-wildlife conflict, particularly poverty alleviation and livelihood development, all except the use of wild species.

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%].	8. Conserve and enhance the sustainable use of biodiversity in ~~agricultural~~ **agriculture (or farming), fishery, forestry, animal husbandry** and other managed ecosystems to support the productivity, **conservation** ~~sustainability~~ and resilience of such systems, reducing by 2030 related productivity gaps by at least [50%].	In Chinese, a broad sense of agriculture refers to five elements: farming, forestry, animal husbandry, fishery and sideline production. Agriculture in a narrow sense refers to farming. Here “agriculture” should be in its broad sense. To prevent misinterpretation, we suggest an addition of "fishery, forestry and animal husbandry". In addition, considering that these managed systems primarily serve for agricultural production, we propose to replace "sustainability" with "conservation".
9. Enhance nature-based solutions contributing, by 2030, to clean water provision for at least [XXX million] people.	9. Enhance **ecosystem service capacity** ~~nature-based solutions~~ contributing, by 2030, to clean water provision for at least [XXX million] people.	This target should aim to enhance water quality and other ecosystem functions, not just to emphasize the use of water resources.
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%].	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%], **particularly women, children, seniors, and people with disabilities**. **Green spaces should be designed and built in a way that is beneficial to biodiversity conservation and the provision of habitats and corridors for species.**	Consistent with SDG 11.7, this target should be focused more on biodiversity conservation as an integral part of green spaces.
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.		
(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.	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. **Carry out a biodiversity census to achieve open and transparent information sharing, and establish a mechanism to facilitate the engagement of stakeholders in biodiversity monitoring, information updating and sharing.** **Ensure that the meaning and significance of biodiversity are widely understood and recognized by all government departments and society at large, including indigenous peoples and local communities, civil society and enterprises.**	It should not be lower than Aichi Target 3 and should be met as soon as possible. Considering the different levels of capacity each country has to collect biodiversity data, we suggest further enhancing information collection and multi-stakeholder participation. An thorough understanding of "biodiversity" must be achieved before fundamental changes to the relationship between humans and nature, as well as mainstreaming, can happen.
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.	13. Integrate biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts, **climate change planning**, **and the development planning of key industries**, ensuring by 2030, that **biodiversity-related financial risks are identified**, values are mainstreamed across all sectors and that biodiversity-inclusive strategic environmental assessments and environmental impact assessments are comprehensively applied, **so that the net increase of**	The mainstreaming target can be achieved only after biodiversity conservation is integrated into the development and planning processes of key industries (such as agriculture and infrastructure) to significantly reduce the threat of biodiversity loss.

	biodiversity can be achieved.	
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.	14. Reform economic sectors **and policy frameworks (including trade policies) at the national, regional, and international levels** 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, **promoting sustainable investment and financing policies and incorporating biodiversity-related risks and impacts into the financial disclosure system**.	In recent years China has made progress in green finance, including the establishment of a green credit performance assessment system. Measures should be taken to integrate biodiversity conservation as soon as possible and incentivize financial institutions to identify and disclose risks.
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 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.	18. **Strengthen understanding and disseminating knowledge relating to biodiversity, p~~P~~**Promote ~~education and~~ the generation, ~~exchange~~, sharing and use of **such** knowledge ~~relating to biodiversity~~, in the case of the traditional knowledge, innovations and practices of indigenous 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 and **enhanced** management of biodiversity.	We edited the text and refined the steps of knowledge-sharing and education.
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	19. Promote the full and effective participation of indigenous peoples and local communities, **civil society**, and of women and girls as well as youth **and the private sector**, in decision-making related to the conservation and sustainable use of biodiversity,	Indigenous peoples and local communities, civil society, women and girls, youth and the private sector are special non-state groups involved in biodiversity conservation. Civil society and the private sector can play a key role in mobilizing and leading social forces to participate in biodiversity conservation.

use of biodiversity, ensuring by 2030, equitable participation and rights over relevant resources.	ensuring by 2030, equitable participation and rights over relevant resources, **establishing legal, normative and resource mobilization mechanisms to ensure support and commitment to incorporating the spontaneous efforts of these groups to biodiversity conservation into the national biodiversity conservation targets.**	Their rights to equitable participation and resource access need to be guaranteed, and this is conducive to mainstreaming both in civil society and among individual citizens. These groups, particularly local communities, civil society and the private sector, help the government keep its promise to reduce threats to species by establishing and maintaining private or community protected areas. Their efforts should be effectively protected by laws and regulations, recognized by the international community, and should be made a pillar of support outside the government.
20. Foster diverse visions of a good quality of life and unleash values of responsibility, to effect by 2030 new social norms for sustainability.	20. **Promote the development of green education systems in all countries, f**~~F~~oster a **green, recycling-oriented, and low-carbon lifestyle**, ~~diverse visions of a good quality of life~~ and unleash values of **ecological conservation** ~~responsibility~~, to effect by 2030 new social norms for sustainability **and harmony between humans and nature**.	Based on SDG target 12.8, China has been promoting green education in recent years, helping raise public awareness of ecological conservation, striving to build a resource-saving and green society, and joining efforts to build eco-friendly values that bring harmony between humans and nature.

Finally, we look forward to further revising the zero draft based on more views and suggestions from various stakeholders at the second OEWG meeting.