

Business for Nature inputs on the Zero Draft of the Post-2020 Global Biodiversity Framework

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Business for Nature (BfN), a global coalition bringing together influential organizations and forward-thinking businesses, welcomes the opportunity to comment on the Zero Draft of the Post-2020 Global Biodiversity Framework. We congratulate the team on making significant progress, which is well recognized and much appreciated. We also attach a copy of [BfN's Policy Recommendations](#), which have been developed after extensive consultation with partner organizations and companies, and which were launched by CEOs in Davos on 21 January 2020. We look forward to contributing to future discussions and drafts.

In addition, we offer the following comments:

1. General comments

- **The document currently focuses strongly on policy and could be strengthened by emphasizing the role of business and finance as part of the solution.** The draft framework mainly addresses one of the three key actors for mainstreaming (as identified in the draft LTAM). The main strategic focus is policy and governments, while other key actors (business, finance and civil society) are only mentioned in a very limited way as part of the solution. The growing number of commitments and actions that business implements to reverse biodiversity loss clearly shows that non-state actors can and should also play their part. We need to join forces to create and deliver a new deal for nature and people. Business is mainly mentioned in terms of 'stopping the bads' rather than encouraging the 'goods' (including the role of technology and innovation). For example, there is no parallel in this document to UNFCCC's approach with non-state/party commitments.
- **The theory of change that forms the backbone of the draft framework is helpful to focus on key issues** (tools and solutions for implementation and mainstreaming; reducing threats to biodiversity; and meeting people's needs). **However, the number of goals and targets is still overwhelming and many of the proposed goals/targets need to be made much more relevant to drive action in the private sector (business and finance).** The list as a whole retains characteristics of the Aichi targets (not all are SMART or address actions of economic actors); given that there has not been sufficient progress on these, it is not clear why the outcome would be different with such a similar approach.
- **There is a need to clarify 'who does what?'** which was an identified reason for the failure of the Aichi targets, and also - what exactly should be done? The Zero Draft (page 6) states that the theory of change *assumes* that transformative actions are taken, and are supported by enabling conditions, but not what these transformative actions and conditions should be. This is particularly true in relation to the sustainable use of wild species. There will need to

be more detailed action steps, particularly around action targets 17 and 20 (sustainable consumption and ‘new social norms’) without which they could appear too high-level to be applicable. Business could have a clear role in promoting consumer behavior change, but it needs to be recognized and spelled out.

2. Comments relating to the Policy Recommendations of Business for Nature

BfN launched five policy recommendations to policy makers required to place nature at the heart of the global economy. Below is a summary of these five recommendations with specific comments on how the Zero Draft could be improved to reflect these recommendations better and encourage a positive feed-back loop between policy ambition and business actions.

1. *The need to adopt targets to reverse nature loss: Provide direction and ambition*

Businesses need long-term certainty to invest in changing business models. Concrete evidence-based targets informed by science are needed to provide clear direction and ambition for business action to reverse nature loss by 2030. These targets should be relevant and translatable from the global to the local level.

- **It is not clear in the document if the CBD is ready to welcome, or even identify, an ambitious apex-target to provide direction and urgency at the highest political level.** Efforts are underway through the Global Commons Alliance and other initiatives to identify an apex target to protect, conserve and restore nature, and to provide evidence-based targets informed by science for organizations. The business-relevance and effectiveness of the Global Biodiversity Framework will increase if such an apex-target is translatable to business decisions and KPIs. The efforts to identify an apex-target should be considered for adoption in the post-2020 framework once agreed and mirrored in a mission statement to halt and start to reverse the loss of biodiversity and put nature on a path to recovery for the benefit of all people and the planet. Note that an informal group of leading conservation, science and business organizations has suggested a proposal of: “Zero net loss of nature from 2020, net positive by 2030, and full recovery by 2050” which we support. Such a proposal calls for a significantly faster change than the one proposed in para. 10 of the CBD Zero Draft, where zero net loss is targeted by 2030 (10.a) and not immediately.
- **This apex target should be underpinned by specific targets** that: a) significantly reduce production and consumption footprints; b) halt and reverse the loss of habitat and species and restore their resilience; c) conserve ecosystem services; d) protect natural areas appropriately respecting the rights, practices and wishes of indigenous peoples and local communities; and e) introduce nature back into man-made environments.

For any targets or mission statement to be effective it has to be supported by an implementation framework. The post-2020 framework should therefore include an implementation and ratchet mechanism informed by science to increase action and ambition.

2. Align, integrate and enforce policies for nature, people and climate: Ensure coherence

Climate change, nature loss and social inequality need to be solved together to achieve a just transition. Policy coherence and efficient implementation and enforcement at global, national and local levels is needed to create a level playing field that supports business action.

- **Policy coherence and integration between the nature, climate, food, health, prosperity and inequality agendas is vital** to ensure that nature and biodiversity are no longer dealt with in a silo but as part of solutions to other societal problems. Mainstreaming of biodiversity needs to be across the Rio Conventions and other international agreements, across departments within country governments and into decision making by governments, business and society as a whole. In the Zero Draft, alignment of nature with the climate, food and inequality agenda needs to be more focused. While the draft provides a good starting point, it is still formulated in a generic way (with a focus on national policies). **The links to nature-based solutions as a key element to combat climate change and inequality as a barrier for success should both be made more explicit.**

3. Value and embed nature in decision making and disclosure: Go beyond short-term profit and GDP

The value of nature for people and the economy needs to be visible and considered in decision making. Governments, companies and financial organizations would take better decisions if they used information ‘beyond short-term profit and GDP’ that includes impacts and dependencies on nature, as well as synergies and tradeoffs informed by science and planetary boundaries. The valuation may be qualitative, quantitative or monetary, to reflect the importance, value, and utility of natural capital, recognizing that nature’s intrinsic value cannot be fully captured in economic terms.

- **The need to value and embed nature in all decision making is not reflected strongly enough in the Zero Draft, and the potential role of natural capital assessments and accounting is not yet mentioned.** We welcome the monitoring-target suggested for private sector organizations to reflect biodiversity in their planning, valuation and impact assessment processes, and would also welcome indicators. However, the draft framework only mentions the valuation of biodiversity in relation to other policies and planning, and not for decisions by business and finance.
- **BfN is calling on governments to adopt policies to enable all actors to go beyond short-term profit and GDP and this idea could be emphasized in the draft.** There is only

a suggested element for a 2030 target for monitoring related to the integration of biodiversity values into national accounts, which is an opportunity to refer to the UN-SEEA framework in the draft. A comparable ambition for private sector applications regarding natural capital assessments and accounting to embed nature in business decision making would be welcomed.

4. *Reform subsidies and incentive mechanisms: Finance a just transformation*

The transformative change needed to reverse nature loss, climate change and inequality cannot be achieved without proper incentives and financial mechanisms. A systemic change is required in subsidies and incentives to reward business leadership to design innovative, circular and profitable business models that deliver positive long-term outcomes on nature.

- **The suggestions to reform incentives and eliminate harmful subsidies are a good first step but need to be elaborated as this is a crucial element in changing the rules of the game. The focus should be on ‘redirecting’ rather than just ‘eliminating’ harmful subsidies.** It is unclear in the draft how the CBD sees the role for other policy domains (such as agriculture, finance, industry, trade) that are crucial to implement the reforms, as it is within their mandate and not CBD’s or Environment/Nature ministries.
- **Resourcing still tends to focus on ‘financing green’ instead of ‘greening finance’.** The focus is on getting more money for biodiversity projects instead of ensuring that all investments take impacts and dependencies on nature into account.

5. *Join forces for nature and empower everyone to act: Engage, enable and collaborate*

Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. Governments play an important role in empowering society to collaborate and act for nature.

- **In the document and theory of change, the sections on support mechanisms, enabling conditions and transparency focus only on policy. The role of Governments in creating an enabling environment for all stakeholders to act is not sufficiently reflected.** The private sector should be identified as a key actor that can deliver solutions for nature, enabling the opportunity to create a positive feedback loop between policy ambition and business action.
- **To empower all parts of society to act at the necessary scale and urgency the post-2020 framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans, in particular for high-impact sectors.** BfN would welcome the CBD to adopt an approach that included non-party commitments as part of a joint public-private approach to reverse nature loss.