**Comments on the CBD ZeroDraft of the Post-2020 Global Biodiversity Framework
from Global Wildlife Conservation**

Global Wildlife Conservation (GWC) conserves the diversity of life on Earth by safeguarding wildlands, protecting wildlife and supporting guardians in more than 50 countries. We maximize our impact through scientific research, biodiversity exploration, habitat conservation, protected area management, wildlife crime prevention, endangered species recovery, and conservation leadership cultivation. https://globalwildlife.org

Recommendations to Parties on the Zero Draft

GWC congratulates the Co-Chairs of the Open-Ended Working Group, the CBD Secretariat and other stakeholders for this comprehensive Zero Draft of the post-2020 Global Biodiversity Framework, in particular the inclusion of outcome-oriented goals and action-oriented targets. Our comments on the Zero Draft are limited to the goals and targets on ecosystems and species, which are core to our mission.

**Goals for 2030 and 2050 (Section B)**

Paragraph 10(a) on a goal for ecosystems

We commend the inclusion of an outcome-based goal for ecosystems and strongly support the inclusion of both _integrity_ and _area_ within this goal. We recommend using the term "net gain" instead of "no net loss" to make this consistent with the proposed 2030 Action Target on ecosystems. The outcome of "retaining existing intact areas and wilderness" in the Action Target on ecosystems should be reflected in the goal on ecosystems, while the Action Target should not duplicate the goal on ecosystems.

Paragraph 10(b) on a goal for species:

We are concerned that the goal for species is considerably less ambitious that the current Aichi Target 12. We call upon Parties to renew the commitment to halt species extinction by 2020.

There is a loophole with this goal where it would be met if all threatened species went extinct and the non-threatened species did not change (because the percentage of threatened species would be zero, and the average abundance of the remaining species would be higher). Furthermore, recovery or restoration of biodiversity could be achieved through increases by species adapted to human-modified landscapes (invasive or native) overriding decreases in species restricted to natural habitats. We recommend a state-based outcome rather than a rate-based target. We also propose that Goal 2 should include the specific language of species recovery used by the Green Status of Species method. Improved wording of the goal would be:

(b) Extinctions halted from 2020, net species extinction risk stabilized by 2030, and the percentage of species with demonstrated recovery (i.e. being viable and ecologically functional across their range) has increased on average by [X%] by 2030 and by [X%] by 2050.

We strongly support the inclusion of the proposed IUCN Green Status of Species index as an additional indicator for this goal. Tested extensively over the past two years, it is the only available globally-applicable metric that can capture species recovery. A representative sample of species could be tracked using this new index. The specific indicators recommended are:

- Number of extinctions prevented according to the Green Status of Species.
- Species-level changes in Green Status of Species Recovery Score.

Action Targets for 2030 (Section D)

Paragraph 12(a)(1) on a target for retaining and restoring ecosystems:

We strongly support the inclusion of a target on ecosystems but feel that this should not duplicate the goal on ecosystems. We suggest that 50% of land and sea area under comprehensive spatial planning addressing land/sea use change is far too low; this should by 100% by 2030. We support including within the target additional *actions* including conservation and restoration, and that the target should specify a net increase in area and integrity *of all natural* ecosystems, as well as the retention of existing intact areas.

Paragraph 12(a)(2) on a target for protecting sites of particular importance for biodiversity:

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). We recommend that KBAs should be specifically mentioned as they are the only 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 prioritization methods (threat, geographical restriction, integrity, ecological 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.).

Currently, 50% of the area of the world's 16,000 Key Biodiversity Areas[1] are covered by protected areas, and preliminary results[2] indicate that many unprotected sites are likely covered by OECMs, 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 don't need effective protection, so suggest dropping this clause. And given the target calls

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[1] www.keybiodiversityareas.org
[2] Donald et al 2019 Conservation Letters DOI: 10.1111/conl.12659

for both protected areas and OECMs, we propose replacing the first word 'protect' with 'conserve'. 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.

We thus propose the following wording for Target 2:

> *(2) Conserve, restore, and document the value of all key biodiversity areas and other sites of particular importance for biodiversity through protected areas and other effective area-based conservation measures, by 2030 covering at least [30%] of land and sea areas.*

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