

17 March 2020

CBD post-2020 Co-Chairs  
CBD Secretariat

--by email--

Dear Co-Chairs of the Open-Ended Working Group on the Post-2020 Global Biodiversity Framework, and Secretariat of the Convention on Biological Diversity,

I am writing on behalf of the Wildlife Conservation Society, United Nations Development Programme, World Resources Institute, and Rainforest Foundation Norway. We would like to congratulate you on a very successful second meeting of the Open-Ended Working Group (OEWG-2) last month in Rome, Italy. We were pleased to observe such extensive and thoughtful discussions undertaken by Parties and Observers on the zero draft of the framework.

We are writing to comment on an important area of divergence noted by Co-Leads of Contact Group 2. The Co-Leads noted in their report to Plenary that, with respect to action target 1 (paragraph 12(a)(1)), *“There was no clear direction taken of how to approach ‘retaining existing intact areas and wilderness’, some proposing its deletion while others supported its retention”* [1]. Although we intervened during the contact group discussion, our organizations would also like to provide the substance of those responses in writing and propose a way forward for consideration by the Co-Chairs and Parties.

We note comments from some Parties that the terms “intact areas” or wilderness” will require clearer definitions. Several peer-reviewed publications do provide clarity on how to define and identify “intact areas” and “wilderness” in both terrestrial and marine environments [2-5], including explicit advice on methodologies using existing datasets that can be used at national, regional and global scales. Furthermore, in defining wilderness areas, these papers make it very clear that such wilderness areas *“do not exclude people... Rather, they have lower levels of impacts from the kinds of human uses that result in significant biophysical disturbance to natural habitats, such as large-scale land conversion, industrial activity, or infra-structure development”* [3].

Particularly in conversations in the margins, we note apprehension by some Parties in using these terms because wilderness and intact areas, as defined in the research cited above, are unevenly distributed across Earth’s surface. Some Parties, therefore, perceive these terms as irrelevant to them. We stress, however, that a) most Parties still have some areas of *relatively* intact ecosystems that should be prioritized for conservation and restoration efforts, or ecosystems that contribute to the integrity of wilderness areas (e.g. by hosting migration pathways), and b) actions taken by Parties may have an impact on wilderness or intact areas in other countries, which would be part of their responsibilities under the Convention. Because these are global targets to be applied carefully at the national and international level, there is ample opportunity for all Parties to contribute to the idea behind the concepts of wilderness and intactness through different types of actions.

The bottom line is that we do understand that there may be different perspectives on the use of those terms in a post-2020 global biodiversity framework, and would not want definitional challenges to

prevent a successful outcome for these negotiations. Whatever terms are used, there is a critical need to ensure that the goals and targets specify those areas which are so significant that they should be subject to an aim of 'no loss' rather than 'no net loss'. As such, we would like to propose a compromise for the consideration of the Co-Chairs and the Parties.

**Instead of using the terms “intact areas and wilderness,” the framework could replace this phrase with “areas of high ecological integrity.”**

We propose this as a practical solution for these reasons:

- It would reduce the number of terms being used in the framework, as many Parties positively received the inclusion of ecosystem integrity within the ecosystem goal (paragraph 10(a)), and this language would tie the action target directly to the goal (as requested by Parties).
- It is a term that governments and other stakeholders use across a variety of scientific and policy contexts, including the CBD Aichi Biodiversity Targets themselves (Aichi Target 10).
- It eliminates problems caused by the perception that intact areas and wilderness are subject to strict binaries that would limit the applicability of this goal to certain Parties.
- Parties could instead set credible, evidence-based thresholds for what constitutes an area of 'high ecological integrity' in relation to their own national circumstances, whilst taking account of international practice. It means all Parties will need to engage in restoring and/or retaining ecosystem integrity and will need to designate national targets that speak to a global set of ecosystem outcomes.
- The concept of “areas of high ecological integrity” can be understood in both a terrestrial and marine context, but “wilderness” is often used only for terrestrial systems.

Our proposed revision of the existing action target 1 is as follows:

*Ensure that 100% of land and sea areas are under comprehensive, multi-sectoral and biodiversity-inclusive spatial plans and policies that prioritize the retention and restoration of existing ~~Retain and restore freshwater, marine and terrestrial~~ ecosystems with high ecological integrity, 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 a net gain in area, connectivity and integrity of all natural ecosystems and no loss of areas with high ecological integrity. ~~and retaining existing intact areas and wilderness.~~*

Clean version of the above:

Ensure that 100% of land and sea areas are under comprehensive, multi-sectoral and biodiversity-inclusive spatial plans and policies that prioritize the retention and restoration of existing ecosystems with high ecological integrity, achieving by 2030 a net gain in area and integrity of all natural ecosystems and no loss of areas with high ecological integrity.

Attached, please find a document on the use of the term integrity relative to other phrases such as intact areas. We look forward to discussing this further with you, and please do not hesitate to get in touch if you have any questions.

Thank you very much for your consideration.



Sincerely,

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*References:*

- [1] Secretariat of the Convention on Biological Diversity (2020). [CBD/WG2020/2/L2 - Preparation of the post-2020 global biodiversity framework.](#)
- [2] Jones, K. R. et al. (2018). "[The Location and Protection Status of Earth's Diminishing Marine Wilderness.](#)" *Current Biology*, 28, 2506–2512.
- [3] Watson, J. E.M. et al. (2016). "[Catastrophic Declines in Wilderness Areas Undermine Global Environment Targets.](#)" *Current Biology*, 26, 2929–2934.
- [4] Kormos, C. F. et al. (2015). "[A wilderness approach under the World Heritage Convention.](#)" *Conservation Letters*, 0, 1–8.
- [5] Watson, J.E.M. et al. (2009). "[Wilderness and future conservation priorities in Australia.](#)" *Diversity and Distributions*, 15(6),1028-1036.