BirdLife INTERNATIONAL

Partnership for nature and people

Astrid Schomaker
Executive Secretary
Secretariat of the Convention on Biological Diversity
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15/12/2025

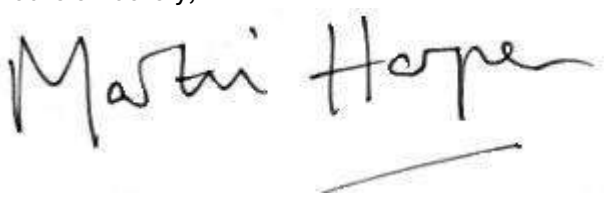
Dear Astrid,

Subject – CBD Notification 2025-135 - Submission of views and information relating to the strategic review and analysis of the current Programme of work on protected areas (PowPA) in the context of the Kunming-Montreal Global Biodiversity Framework

BirdLife International would like to submit the following reflections on the current Programme of work on protected areas. These focus, as requested, on the Programme's alignment with the KMGBF. Please find the text of the submission appended to this letter.

Thank you for the invitation to participate in this consultation and pledge our continued support of the work of the Convention.

Yours sincerely,



Martin Harper
CEO, BirdLife International

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BirdLife International is a charity (No 1042125).
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CBD Notification 2025-135 - Submission of views and information relating to the strategic review and analysis of the current Programme of work on protected areas (PowPA) in the context of the Kunming-Montreal Global Biodiversity Framework

BirdLife International Submission

BirdLife International is the largest conservation Partnership with 123 national Partners covering all continents and landscapes: the only global Partnership conserving birds and all life on our planet.

Submission

We support the core elements of the PoWPA but wish to emphasize the need for **a brief and concise updated programme of work which focuses on delivering the core components of Target 3, as it is directly relevant to this programme of work**. This should include:

1. Identifying and protecting areas of particular importance for biodiversity and ecosystem functions and services (Key Biodiversity Areas)
2. Effectively conserving and managing Protected Areas and OECMs (effective management)
3. Recognizing and respecting the rights of indigenous peoples and local communities, and,
4. integrated into wider landscapes, seascapes and the ocean (mainstreaming)

BirdLife will provide further recommendations on areas 1, 2 and 4 in particular, although we fully support the integration of this PoW with the 8(j) subsidary body in regard to area 3. This would help ensure that Parties clearly understand the priority actions required for implementation. In this regard, we will refrain from proposing specific text changes but instead offer a few key comments and general recommendations.

Aligning PoWPA with target 3 of the KM-GBF and Key Biodiversity Areas (KBAs)

Ensuring 'areas of particular importance for biodiversity' are incorporated into Protected and Conserved Area networks is a key component for the delivery of Target 3 of the KMGBF. Key Biodiversity Areas (KBAs) are the most comprehensive way for Parties to identify these areas through a nationally led, scientifically robust, bottom up process. KBAs play an essential role in achieving the area-based targets of the KM-GBF, particularly Target 1 and 3, and in supporting the programme of work on protected areas, including monitoring progress.

Each KBA is defined as a distinct, geographically delineated site on land and/or in water with clear ecological, physical, administrative, or management boundaries that enable it to be managed as a single unit. While some KBAs are designated protected areas or recognised as OECMs, others are stewarded by local communities or private landowners, and some currently lack active management.

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As part of this, we recommend the PoWPA focuses on the identification of new Protected Areas, as well as the recognition of established OECMs.

The process of identifying and re-assessing KBAs consolidates biodiversity data to guide conservation action and therefore can meaningfully support the PoWPA. A recent study found many countries are missing about half their crucial biodiversity sites in national conservation plans (Plumptre et al, 2025). This emphasises the importance of Parties undertaking a comprehensive biodiversity-inclusive spatial planning process, as identified by Target 1 of the KMGBF, to support the identification and management of PCAs. Significant information gaps remain regarding the location of the most important KBAs, underscoring the need for national coordination in their identification.

In addition, the PoWPA must focus on the effective management of existing PAs and OECMs. KBAs can contribute to this through forthcoming tools to assess the condition of KBAs through remote sensing, however guidance from the IUCN WCPA, as well as tools like the IUCN Green List can be incorporated into the PoWPA here as well.

Recommendation: To address the gaps in identification of 'areas of particular importance for biodiversity' under the PoWPA, and to support challenges around monitoring PCAs, we suggest adding an activity recommending that Parties and the CBD Secretariat collaborate with the KBA Secretariat to identify and then protect global and regional KBAs (areas of particular importance for biodiversity). This would support 30×30 planning and OECM identification by providing quality, quantitative biodiversity data through KBA assessments. We also highlight the importance of having specific polygon and boundary data when planning protected areas, as this is crucial for monitoring, synergies, and achieving the 30×30 target.

Aligning the PoWPA with GBF Target 4 full integration of species-related actions

Despite the clear importance of PCAs in the conservation of species, and *vice versa* the significant contribution that species make to thriving ecosystems, in its current form the PoWPA actions lack a comprehensive approach on these aspects.

There is a need for the inclusion of more specific goals and actions that highlight the role of PCAs in conserving non-migratory, resident species. While other conventions, most notably the Convention on the Conservation of Migratory Species of Wild Animals (CMS), address the needs of migratory species, far less attention has been given to species that do not migrate.

Therefore, we encourage stronger linkages to species-focused work and recommend full integration of the actions identified within the Global Species Action Plan (GSAP)[1]. The Global Species Action Plan (GSAP) is designed to provide guidance on the actions required to conserve and sustainably use wild species under each of the GBF targets. Significantly, the COP has already recognised its contribution to delivery of the GBF.

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Recommendation: **Integrate into the PoWPA the species-related actions as identified under Target 3 within the GSAP.** For a full list of actions, please see the GSAP TABLE OF INDICATIVE ACTIONS FOR THE CONSERVATION AND SUSTAINABLE USE OF SPECIES Global Biodiversity Framework Target 3 pages 14- 16[2].

In addition, we wish to see the action 1.3.7, concerning regional cooperation under the CMS on migratory species actions, reinforced in the updated programme of work.

Mainstreaming

Mainstreaming protected areas and biodiversity considerations into national policies, sectoral strategies, and spatial planning processes is essential to achieving lasting conservation outcomes. Protected areas cannot function effectively in isolation; their success depends on the wider policy and land-use context in which they are embedded. When biodiversity values are integrated into sectors such as agriculture, forestry, fisheries, infrastructure, tourism, and energy, pressures on protected areas are reduced and ecological connectivity is strengthened.

The rapid gap analysis also underscored that sector-specific guidance may be needed. Different sectors interact with biodiversity in distinct ways, and tailored guidance can support better alignment between sectoral policies and protected area objectives. Such guidance could help identify risks, opportunities, and best practices for integrating biodiversity considerations into each sector's operations.

Recommendation: We consider it essential that the updated PoWPA explicitly addresses the mainstreaming-related targets of the KM-GBF, particularly Targets 14 and 15, which focus on integrating biodiversity into decision-making and promoting private-sector engagement. Ensuring that economic and development sectors recognize the benefits of protected areas will help prevent activities that undermine conservation goals and instead encourage practices that contribute to them.

Synergies with other multilateral environmental agreements and cooperation with civil society

We underscore the importance of cooperation and synergies with other multilateral processes, particularly the CMS, the Ramsar Convention on Wetlands, the World Heritage Convention, and the UNESCO MAB Programme. We also note that references to international processes should be updated.

Furthermore, numerous initiatives are underway in support of the 30x30 goal and the implementation of Target 3. The updated PoWPA should address how coordination with these initiatives will be ensured.

Finally, the previous programme of work did not consider the role of civil society. We therefore encourage the updated PoWPA to explicitly promote the participation of relevant organizations and civil society actors. For example, BirdLife International can support Parties in specific actions by providing

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information on critical sites for biodiversity through the KBA network and information on bird species as the global authority for birds on the IUCN Red List. As an additional resource, Parties can also access biodiversity data for free through IBAT.

Recommendation: the PoWPA identifies a clear plan on how the CBD will interact with other international instruments that establish Protected and Conserved Areas to deliver Target 3 of the KMGBF. It also should clearly state how it interacts with other initiatives focused on PCAs, and builds on the work of civil society.

Additional general remarks:

- The timelines must be adjusted to reflect the KM-GBF schedule, with the understanding that the targets will need to be reviewed and updated post-2030 and keeping in mind that the goals of the framework extend until 2050.
- In multiple actions, the Parties are asked to establish national time-bound targets. We believe this work should be conducted under the National Biodiversity Action Plans and Strategies (NBSAPs); therefore, we suggest referring to NBSAPs instead.
- We support updating relevant databases and call for partnerships between the Secretariat and international organizations that have developed and maintained monitoring systems and databases on protected areas or other effective area-based conservation measures (OECMs).
- Similarly, we support activities that strengthen scientific, research, and technical cooperation at the regional, national, and global levels to enhance the establishment and effectiveness of protected areas.

[1] IUCN (2023). Global Species Action Plan: Supporting implementation of the Kunming Montreal Global Biodiversity Framework. Gland, Switzerland: IUCN.

[2] IUCN (2023). Global Species Action Plan: Supporting implementation of the Kunming Montreal Global Biodiversity Framework. Gland, Switzerland: IUCN. GSAP TABLE OF INDICATIVE ACTIONS FOR THE CONSERVATION AND SUSTAINABLE USE OF SPECIES Global Biodiversity Framework Target 3 pages 14- 16

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