FEDERATIVE REPUBLIC OF BRAZIL
MINISTRY OF FOREIGN AFFAIRS
ENVIRONMENT DEPARTMENT
BIODIVERSITY DIVISION

Brasília, 30th December 2025

Ms. Astrid Schomaker
Executive Secretary
Convention on Biological Diversity (CBD)

Dear Secretary Schomaker,

Pursuant to Notification CBD 2025/135 (SCBD/SSSF/SS/JA/MG/MS/92511), you may find attached Brazil's 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.

Please accept the assurances of my highest consideration.

Diogo Machado Gonçalves
CBD National Focal Point
Ministry of Foreign Affairs of Brazil

Brazil's 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

Brazil would like to share the following views and information regarding the strategic review of the current Programme of Work on Protected Areas (PoWPA) in the context of the Kunming–Montreal Global Biodiversity Framework (KMGBF). At the outset, it is important to acknowledge key operational dilemmas that may affect the achievement of Target 3. First, many countries may be able to expand the area formally designated as protected; however, without adequate and predictable financing, sufficient staffing, effective management plans, and meaningful local participation, such expansion risks being largely nominal and unlikely to deliver durable conservation outcomes. Second, conservation approaches that overlook, restrict, or displace Indigenous Peoples and Local Communities not only undermine human rights but also tend to be ineffective from an ecological standpoint. While the GBF underscores equitable governance and the recognition of areas conserved by Indigenous Peoples and Local Communities, translating these commitments into practice requires appropriate legal frameworks, procedures to ensure free, prior and informed consent (FPIC) where applicable, and fair and equitable benefit-sharing arrangements. Third, available assessments point to a substantial global biodiversity finance gap, and closing it (at the scale of hundreds of billions of dollars annually) will depend on sustained political will, enabling domestic policy and regulatory measures (including fiscal instruments, incentives, and payments for ecosystem services), and clear, transparent public–private arrangements capable of mobilizing and maintaining long-term funding.

To address these difficulties, a phased planning approach could be adopted, with mandatory intermediate milestones to ensure that Target 3 is achieved by 2030, rather than pursuing implementation as a single continuous process. In practice, implementation could proceed in iterative cycles, covering diagnosis and planning, expansion and consolidation, and results and evaluation, supported by a clear timeline. In the immediate term (2025), Parties would complete national gap assessments (including representativeness mapping, governance arrangements, and capacity needs) and identify priority areas to reach 30% with a focus on effectiveness. In the short term (2025–2027), implementation would concentrate on prioritized areas through the establishment and expansion of protected areas, the development of management agreements with Indigenous Peoples and Local Communities, and the creation of critical corridors and mosaics of protected areas. In the medium term (2027–2030), efforts would focus on consolidating effective management, monitoring outcomes, securing recurrent financing, and strengthening sectoral integration, so that the 30% target is met by 2030 with both equity and effectiveness.

In this context, effective implementation will require coordinated action and a clear allocation of responsibilities among the actors involved. National governments should provide leadership in identifying priority areas, establishing the necessary legal and policy instruments, mobilizing resources, and ensuring intersectoral coordination. Subnational authorities (states and municipalities) are central to local delivery, including enforcement, day-to-day management, and building partnerships with communities on the ground. Indigenous Peoples and Local Communities should be recognized as key rights-holders and implementing partners through co-governance and, where applicable, direct territorial management, while also contributing traditional knowledge and serving as essential stewards; this requires their full participation in

decision-making and access to direct financing. International NGOs and technical networks can provide specialized support, such as systematic conservation planning and priority assessments, while also assisting with programme design and implementation and facilitating access to relevant funding streams. The private sector and financial institutions have a pivotal role in aligning financial flows with biodiversity objectives through sustainable investment, risk-management approaches, and market instruments that support conservation outcomes. The scientific community and universities contribute the evidence base through ecological research, monitoring protocols, criteria for representativeness and connectivity, and evaluations of effectiveness. Finally, multilateral organizations and funders can provide grants and financing to scale up measures and help steer investment flows toward the delivery of Target 3.

Moreover, achieving Target 3 by 2030, ensuring that at least 30% of terrestrial and marine areas are effectively conserved and managed through representative, well-connected systems with equitable governance, including the recognition of Indigenous and traditional territories, will require the PoWPA review to incorporate and strengthen several core elements. In particular, the review should shift emphasis from purely spatial metrics to indicators of effectiveness, including management performance, measurable conservation outcomes, ecological integrity, and social equity. It should also explicitly operationalize equitable governance and the rights of Indigenous Peoples and Local Communities by requiring appropriate safeguards, ensuring free, prior and informed consent (FPIC) where applicable, and recognizing areas conserved by Indigenous Peoples and Local Communities as an integral part of conservation efforts. In parallel, stronger provisions would be required to advance ecological connectivity and representativeness based on science-driven prioritization, including methods to identify and secure corridors and to improve representativeness through biodiversity mapping, hotspot analyses, and the identification of critical functions and ecosystems. Finally, the review should embed sustainable financing and innovative resource-mobilization mechanisms, such as national biodiversity funds, payments for ecosystem services, transparent public–private partnerships, and biodiversity-linked climate finance instruments, supported by clear financial targets and an implementation timeline.

The objectives, targets, and activities under the PoWPA that should be prioritized to effectively support national implementation of GBF Target 3 merit particular attention. As immediate, high-impact measures, Parties should undertake national gap mapping and assessments to identify additional areas for protection, evaluate ecological representativeness and connectivity, and ensure that local communities are meaningfully engaged throughout the design and implementation process. In the short term (2025–2027), emphasis should be placed on recognizing, formalizing, and supporting protected areas and other conserved or managed areas under the stewardship of Indigenous Peoples and Local Communities, including by accelerating relevant legal and administrative processes and providing resources to enable co-management arrangements. For the 2025–2030 period, priority actions should focus on ensuring effective management and demonstrable outcomes by institutionalizing evaluation and performance systems, delivering capacity-building programmes, and adopting management plans with measurable targets. In parallel, efforts should strengthen connectivity and protected area networks by identifying and securing priority ecological corridors and integrating protected areas within broader managed landscapes. These measures must be underpinned by sustainable financing and long-term mechanisms, including the creation or strengthening of national biodiversity funds, payments for ecosystem services, and financial instruments that ensure recurrent funding reaches local managers. Finally, robust social safeguards and participatory processes, covering FPIC where applicable, fair and equitable benefit-sharing, and conflict-resolution mechanisms, should be integrated with continuous social monitoring, and expansion pathways toward 30% should be required to demonstrate explicitly how both effectiveness and rights will be ensured.

Despite the relevance of preventing, mitigating, and adapting to climate change and its associated impacts, the issue of reducing the risk of natural disasters and extreme events is addressed only under the topics of forest biodiversity, biodiversity in agriculture, and island biodiversity. However, these extreme phenomena affect all ecosystems, biodiversity broadly, and human populations—including Indigenous Peoples and Local Communities—so they should be addressed more robustly in the PoWPA.

With regard to species at risk of extinction, greater emphasis is recommended on addressing threats and protecting critical habitats, prioritizing these actions across all targets and programmes of work. It would also be desirable to extend to other ecosystems and taxonomic groups the action that addresses "identify nationally and then act, as appropriate, to improve the conservation status of threatened species, including migratory species, dependent on inland water ecosystems."

As for invasive alien species (IAS), it is considered that, in general, the programme of work addresses the issue in different sections, with emphasis on prevention and minimizing the risks of new invasions. The document also prioritizes early detection and rapid response in marine and insular environments, in addition to a focus on management, control, and eradication. However, it is suggested that the review of the PoWPA integrate these mechanisms more clearly and operationally, aligning it with GBF Targets 3 and 6.

The importance of establishing and managing marine protected areas should also be highlighted, including through the development and implementation of comprehensive integrated management plans for marine and coastal areas from local to national scale, with the full and effective participation of local communities, ensuring that the establishment and management of these areas contribute directly, where appropriate, to poverty reduction. In this context, it is suggested to reinforce the recommendations under Targets 5 and 9 to eliminate destructive fishing practices; restore and maintain fish stocks at sustainable levels; strengthen enforcement, surveillance, and patrolling; and recognize the importance of sustainable fishing practices, including traditional practices.

The review of the PoWPA should shift from an approach focused primarily on expanding coverage to one that also prioritizes management effectiveness and equity in social participation, supported by clear operational timelines and instruments, so that expansion by 2030 genuinely advances GBF Target 3. To that end, the PoWPA review could incorporate several reinforcing improvements. First, given that the monitoring of functional groups is not currently operational under the Convention, it would be useful to establish a Global Key Functional Groups Monitoring Initiative under the Monitoring Programme of Work, supported by dedicated technical working groups for pollinators, decomposers, dispersers, and other functional groups essential to sustaining ecological processes. Second, since drivers of biodiversity loss are often addressed in a fragmented manner, the review could create a Task Force on Integrated Management of Multiple Stressors, explicitly examining the combined effects of habitat loss, inappropriate pesticide use, climate change, and invasive alien species, and strengthening coherence across the Programmes of Work on Agriculture, IAS, Climate Change, and Health. Third, in light of agricultural incentives that may be harmful to biodiversity, the Programme of Work on Agricultural Biodiversity should be prioritized and accelerated. Finally, considering that risk assessment has been treated relatively cautiously under the Convention, the review could promote the development, together with the FAO, of voluntary technical guidelines for pesticide risk assessment for native pollinators across different biomes, to be annexed to the Programme of Work on Agricultural Biodiversity.

Regarding the contributions on Indigenous-related issues to the Programme of Work on Protected Areas, in the context of the KMGBF, Brazil would like to share the following views and information.

Indigenous territories play a strategic role in the conservation of biodiversity at the global scale and, together with the traditional knowledge of Indigenous Peoples, constitute one of the main pillars for the effective implementation of the KMGBF. In this sense, maintaining the integrity of these territories and recognizing Indigenous Peoples' own management systems are essential for ensuring that the commitments undertaken under the Convention on Biological Diversity are translated into concrete short-, medium- and long-term actions through 2030, in a fair, equitable and socially sustainable manner.

First, the recognition of Indigenous Peoples' rights as a foundational element of protected area policy, rather than merely a crosscutting declaratory principle, must be incorporated and substantially strengthened. While the KMGBF, particularly under Target 3, affirms that protected areas and other effective area-based conservation measures should be implemented in a fair and equitable manner, the PoWPA still lacks clear mechanisms to translate this commitment into operational guidance. The continued predominance of an approach driven mainly by biophysical targets and territorial coverage constrains the meaningful integration of the territorial, cultural and political dimensions of Indigenous Peoples, who must be recognized as rights-holders and central actors in conservation governance.

Against this backdrop, the full, effective and continuous participation of Indigenous Peoples and Local Communities in decision-making processes should be strengthened as a core requirement under the PoWPA. Although the inclusion of Indigenous Peoples is referenced in the PoWPA and in other CBD programmes of work, participation has too often been limited to ad hoc consultations, without guarantees of substantive influence over strategic decisions concerning the establishment, expansion and management of protected areas. This gap is inconsistent with the spirit of KMGBF Target 22, which calls for the full and effective participation of Indigenous Peoples and Local Communities in the implementation of the Framework. The PoWPA review should therefore move toward establishing minimum standards for participation, including shared governance arrangements, recognition of Indigenous decision-making systems, and access to information in culturally appropriate formats.

A further element that should be incorporated more explicitly into the PoWPA is free, prior and informed consent (FPIC) as a mandatory safeguard for projects and actions associated with protected areas that may affect Indigenous Peoples and Local Communities' lands, waters, territories or areas of traditional use. FPIC is an internationally recognized right, notably under International Labour Organization (ILO) Convention No. 169 (ratified by Brazil) which establishes the obligation to consult Indigenous Peoples whenever administrative or legislative measures may directly affect them. While FPIC is referenced in other CBD decisions, it is not yet clearly operationalized within the scope of the PoWPA. This is a significant gap, particularly in the context of implementing KMGBF Target 3, as the expansion of protected areas and other area-based measures, if pursued without robust safeguards, may lead to territorial conflicts and rights violations.

The need to strengthen safeguards becomes even more evident when one considers the indirect and cumulative impacts of environmental and development policies on Indigenous ways of life. Recent experience with the spread of the so-called cassava witches' broom fungus provides a clear illustration of the vulnerability of traditional food systems to ecological disturbances. Unlike cacao witches' broom, which is caused by the fungus *Moniliophthora perniciosa*, the outbreaks observed in cassava cultivation have been associated with fungi of the genus *Ceratobasidium*, including *Ceratobasidium theobromae*, and have resulted in significant productivity losses.

In the region of the border between Brazil and French Guiana, particularly in the municipality of Oiapoque, in the State of Amapá, the outbreak had a disproportionate impact on Indigenous Peoples' food base and their primary source of agricultural income. The official detection of the pest in Indigenous areas in northern Amapá underscored the vulnerability of traditional food

systems to the emergence and spread of diseases in tropical agroecosystems, a phenomenon that may be further intensified by climate change. This case also reinforces the relevance of CBD Decision VIII/23, in connection with KMGBF Target 9, by recognizing the importance of traditional knowledge for understanding and safeguarding the biodiversity–food–nutrition nexus.

The initial public response focused on emergency measures, such as the provision of industrialized food supplements, alongside technical and scientific approaches aimed at containing the outbreak, including the selection of plant material for laboratory propagation and attempts to introduce non-local cassava varieties. Recent experiences, however, have shown greater effectiveness where responses were Indigenous-led and grounded in an integration of traditional knowledge systems. In the Wajãpi Indigenous Land, for example, an inter-institutional initiative involving Indigenous agents, the Iepé Institute, FUNAI, and state authorities prioritized adapted traditional management practices, the conservation of agrobiodiversity, and the multiplication of locally resistant varieties, more than forty of which were documented, thereby preventing genetic erosion and strengthening community food security.

The combination of these technical, political and community-based factors shows that responses to environmental threats, especially those capable of undermining food security and the economic foundations of communities, must rely on effective articulation between science and traditional knowledge. The cassava case therefore underscores the value of formal collaboration mechanisms, including *ad hoc* groups dedicated to identifying and advancing locally grounded solutions led by Indigenous Peoples and Local Communities. This approach is fully consistent with the spirit of the KMGBF, notably Target 22, which calls for full and effective participation, and Target 9, which links agricultural biodiversity, nutrition and the safeguarding of traditional knowledge.

This need is even more pressing given the heightened vulnerability of these populations to the impacts of conventional logistics and production projects and, more recently, to the rapid expansion of initiatives associated with the energy transition. Indigenous Peoples and Local Communities are increasingly facing new territorial pressures driven by the search for alternative energy sources, with the potential to replicate long-standing patterns of displacement, cultural disruption and loss of autonomy over areas of common use.

In parallel, the installation of wind farms and solar plants in areas of common use, fishing grounds, and zones adjacent to Indigenous communities, particularly in coastal and semi-arid regions, has generated impacts that go beyond land occupation. Documentary evidence and case studies in Brazil point to constant turbine noise, persistent nuisance, and negative effects on local ways of life, especially for local communities. Academic research on the deployment of wind projects in Brazil's Northeast also records socio-environmental conflicts, restrictions on customary land use, and disruptions to community dynamics.

In sum, effectively aligning the PoWPA with the KMGBF in relation to Indigenous Peoples and Local Communities requires stronger safeguards, the operationalization of full and effective participation, recognition of traditional knowledge as a foundation for conservation solutions, and the incorporation of equity and socio-environmental justice criteria. The PoWPA review therefore represents a strategic opportunity to address long-standing gaps and to ensure that the expansion and management of protected areas contribute simultaneously to biodiversity conservation and to the protection of Indigenous rights and ways of life.

This orientation is not merely programmatic; it reflects clear operational requirements embedded in the KMGBF that should guide the PoWPA review. Target 1 requires that land-use planning and spatial planning be carried out in a participatory and integrated manner, which implies treating Indigenous land use as a binding parameter rather than ancillary information. Target 3 conditions the expansion of protected areas and other effective area-based conservation measures on

principles of justice, equity, and respect for rights—effectively precluding conservation processes that replicate displacement, impose arbitrary access restrictions, or undermine territorial autonomy.

In the area of agricultural biodiversity, Target 9 reinforces that maintaining food-related genetic diversity depends on safeguarding traditional food systems and recognizing Indigenous ecological knowledge as a conservation "technology", a dimension clearly reflected in responses to cassava witches' broom and other phytosanitary threats. Target 22, in turn, calls for the full, effective, continuous, and decision-making participation of Indigenous Peoples and Local Communities across all KMGBF implementation processes, including protected area governance, impact assessments, benefit-sharing mechanisms, and territorial-use models.