forestry, fisheries & the environment
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

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Ms Astrid Schomaker
Executive Secretary
Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
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Montreal, Quebec, Canada
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Dear Ms Schomaker

**SUBMISSION OF SOUTH AFRICA'S 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 (KMGBF)**

South Africa expresses its appreciation to the Secretariat for the opportunity to submit its views and information in support of 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 (KMGBF) (hereafter referred to as the Review of PoWPA). South Africa considers this to be a timely and constructive opportunity to review and update the PoWPA, recognising the fundamental role that protected areas play as a cornerstone of biodiversity conservation. Moreover, the update has been long overdue since Parties have not undertaken any formal update of the PoWPA since its adoption in 2004 (Decision VII/28, Annex).

We support the process established to review and update the PoWPA in the context of the KMGBF and wish to contribute constructively to this process. South Africa is of the view that the PoWPA, which comprises 16 targets and 126 specific actions, remains a relevant and valuable instrument for supporting the implementation of the KMGBF. However, the KMGBF introduces a paradigm shift from PoWPA in several important ways; which will require strategic alignment. For example, KMGBF introduces: (a) From Protected Areas to Area-Based Conservation, (b) Stronger emphasis on Rights and Equity and (c) Stronger emphasis on restoration.

Our submission is presented in a tabular format (**Annexure A**, refers) and is structured in accordance with the guidance provided in the notification inviting submissions from relevant authorities on the strategic review and analysis of the current PoWPA in the context of the KMGBF. General comments are provided at the outset, followed by responses to the guiding questions outlined below.

1) *What aspects should be incorporated or reinforced in the current review of the Programme of Work to improve alignment with the Kunming-Montreal Global Biodiversity Framework? Please consult the rapid gap analysis in document CBD/SBSTTA/25/INF/1 for reference.*
2) *How could the approach to implementing the Programme of Work be revised to better contribute to achieving Target 3 of the Kunming–Montreal Global Biodiversity Framework? In your response, consider potential actors and timeframes.*
3) *Which goals, targets, or activities of the Programme of Work should be prioritized to support national implementation of the Framework by 2030?*

The intention is not to propose a line-by-line rewrite of PoWPA, but to provide clear high-level pointers on where and how PoWPA could be updated to reflect and align with the KMGBF.

Please note that this correspondence repeals the correspondences submitted on 15 and 19 December 2025.

Thank you for your consideration.

Yours sincerely,



**Ms Malepo Phoshoko**
**Director: Biodiversity Multilateral Coordination (CBD National Focal Point)**
**DATE: 22 December 2025**

**ANNEXURE A: REGISTER OF SOUTH AFRICA'S VIEWS**

| A. General Comments | |
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| **Key issues and rationale** | **Recommendations and proposals** |
| South Africa welcomes the strategic review of the PoWPA in the context of the KMGBF. South Africa reiterates its appreciation for the opportunity to provide views on the strategic review of PoWPA. We do acknowledge that this Programme of Work has played a central role in advancing protected area systems globally, and with appropriate updates, it can continue to serve as a practical tool and operational guidance document for Parties to effectively implement the KMGBF Target 3, thus ensuring that protected areas and other conserved areas truly contribute to halting and reversing biodiversity loss. An updated and strengthened PoWPA could provide Parties and other relevant stakeholders with the operational tools they need to effectively establish and maintain national and regional systems of terrestrial and marine protected areas that are comprehensive, effectively managed, and ecologically representative by 2030 and beyond. | South Africa fully supports the first review and update of the PoWPA since its adoption in 2004 to serve as the operational guide for implementing the KMGBF, especially Target 3. We believe that the update would not be too much of a task, given that some of the core principles and elements of PoWPA have already gradually entered the broader CBD decisions and implementation processes, including in the KMGBF. In this document, we provide key pointers on the areas of the PoWPA that need to be updated to align with the KMGBF. |
| As Parties transition from the Aichi Biodiversity Targets to the KMGBF, many of the terms and concepts central to the implementation KMGBF Target 3 such as "Areas of particular Importance for Biodiversity and Ecosystem Functions and Services", "*Effectively Conserved and Managed*", "*Ecologically Representative*", "*Well-Connected*", "*Equitably Governed*", and "*Other Effective Area-Based Conservation Measures (OECMs*)" are being domesticated in diverse national contexts. However, the broad nature of these concepts, while flexible, requires clearer, more operational definitions and guidance to ensure coherence, comparability and rigour across Parties. | Countries such as South Africa, which have long relied on innovative approaches to expand conservation area estates, offer valuable experience that can inform the global refinement of these terms and the overall implementation of KMGBF Target 3. South Africa's Biodiversity Stewardship Programme is widely recognised as an international best practice for securing biodiversity outside the state-owned protected area estate through voluntary agreements with landowners, communities and traditional authorities. This model has enabled the expansion of conservation areas in a cost-effective, socially grounded and ecologically strategic manner, creating a robust foundation for advancing both protected areas and OECMs under the KMGBF.<br><br>South Africa's stewardship approach includes a range of legal and non-legal categories, providing flexibility for different landholding types and conservation objectives. In addition, South Africa has a range of existing |

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| | management measures in the marine and coastal environment which help enhance the conservation of biodiversity. In our view, the revised PoWPA must explicitly address sustainable financing, particularly for biodiversity areas outside formal protected areas that are under the custodianship of IPLCs in many countries. These territories play a critical role in achieving the 30x30 agenda, yet often lack access to predictable, direct and culturally appropriate financial mechanisms for stewardship, restoration and monitoring. |
| **B. What aspects should be incorporated or reinforced in the current review of the Programme of Work to improve alignment with the Kunming-Montreal Global Biodiversity Framework?** | |
| **Key issues and rationale** | **Recommendations and proposals** |
| It has been well documented that PoWPA has played a central role in advancing protected area systems globally. It has always been viewed as a practical, capacity-building programme designed to help Parties create and manage ecologically representative protected area systems, and we believe that it remains essential day-to-day operational content for countries to effectively implement the KMGBF, in particular, Target 3. We believe that updating the PoWPA is essential for delivering on the KMGBF and ensuring that protected and conserved areas truly contribute to halting and reversing biodiversity loss. | South Africa recommends that the PoWPA be updated to serve as the operational guide for Parties to effectively implement the KMGBF, particularly Target 3. An updated PoWPA should, over and above the existing goals, targets, and activities include guidance on development and implementation of sustainable finance plans, post establishment support, institutional arrangements including participation of Indigenous People and Local Communities (IPLCs), and Youth, the diversification of various governance types, fair and equitable sharing of benefits flowing from OECMs and protected areas, evaluation and improvement of management effectiveness, linkages between the PoWPA and other KMGBF targets apart of Target 3, and mainstreaming of the PoWPA into other sectors. These additions and the need to strengthen the guidance of the existing goals, targets, and activities would ensure that the updated PoWPA remain relevant, effective, and aligned with KMGBF.<br><br>Moreover, there is a need for the updated PoWPA to be understood, acted upon, implemented, reported and evaluated, in consistent with the key considerations for the implementation of the KMGBF, including recognising the contribution and rights of IPLCs, adoption of the whole-of-government and |

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| | whole-of-society approach, implementing the PoWPA in line with national circumstances, priorities and capabilities and following a human rights-based approach, respecting, protecting, promoting and fulfilling human rights, etc. |
| While the PoWPA enshrines development of participatory, ecologically representative and effectively managed national and regional systems of Protected Areas (*Defined means a geographically defined area which is designated or regulated and managed to achieve specific conservation objectives*), it does not take into account the important contribution of conservation areas outside of formally protected areas such as the Other Effective Area-Based Conservation Measures (OECMs) (*A geographically defined area other than a Protected Area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in situ conservation of biodiversity*). It is our view that the OECMs and other conservation sites outside of formally protected areas, including land collectively held and used by IPLCs, make an important contribution to the global systems of conservation estate. Both Protected Areas (PAs) and OECMs are a cornerstone of biodiversity conservation and livelihoods, including improved food and water security; climate mitigation; disaster risk reduction; and health and well-being. | South Africa recommends that the scope of PoWPA be expanded to include a focus on both declared Protected Areas and OECMs, including the IPLC's territories, lands and waters. Moreover, the role and rights of IPLCs, governance systems and their custodianships should be included within area-based conservation strategies and the global accounting for conservation areas so as to be more inclusive.<br><br>We also recommend that the PoWPA should ensure that PAs and OECMs sites are sufficiently well-planned, ecologically representative, well-connected, and effectively managed in order to achieve both the socio-economic and the conservation outcomes. |
| South Africa also recommends that the newly updated PoWPA also incorporate the Target 1 (Spatial planning) and 2 (Restoration) of the KMGBF, so as to consider the spatial planning and restoration/rehabilitation aspects of the national and regional systems of Protected Areas and OECM. | South Africa recommends that the newly updated PoWPA also incorporate Targets 1 and 2 of the KMGBF to consider the spatial planning and restoration/rehabilitation aspects of the national and regional systems of Protected Areas and OECM. One of the activities that could be included in the revised PoWPA includes the following:<br>▪ <u>Support the rehabilitation of degraded habitats within and outside protected areas to enhance ecosystem integrity.</u> |
| We are of the view that the current PoWPA, in the main, emphasises the monitoring and reporting on the management effectiveness of the protected areas (e.g., Management Effectiveness Tracking) over other monitoring and reporting tools. It would be crucial for the updated PoWPA to improve the monitoring of the PoWPA to become more robust, including by aligning the PoWPA with the formal KMGBF Monitoring Framework, so that countries become obligated to report progress against the PoWPA using the related indicators in the KMGBF Monitoring Framework. Adding the KMGBF Monitoring | South Africa suggests that the updated PoWPA introduce new monitoring and reporting requirements, including by adopting the KMGBF Monitoring Framework and indicators, so countries are obligated to report progress against the PoWPA using the related indicators in the KMGBF Monitoring Framework. Alternatively, the secretariat may commission a study to identify suitable (scientifically sound and straightforward) indicators for assessing and |

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| Framework to the updated PoWPA will introduce new reporting requirements and clearer indicators for area coverage and effectiveness of protected areas and OECM. | monitoring area coverage, effectiveness, and representativeness of the protected areas system.<br><br>We also recommend that the updated PoWPA introduce new additional actions that make reference to the implementation of national and regional programmes to monitor and assess ecosystem condition and track changes in species threat status within protected area systems and sites.<br><br>South Africa stands ready to share experience and to learn from other Parties in the further development of guidance on monitoring and reporting on PoWPA. |
| **C. How could the approach to implementing the Programme of Work be revised to better contribute to achieving Target 3 of the Kunming–Montreal Global Biodiversity Framework? In your response, consider potential actors and timeframes.** | |
| **Key issues and rationale** | **Recommendations and proposals** |
| In our view, strengthening the implementation of PoWPA will require concerted efforts from all sectors of society at national, regional and international levels. | We recommend that the revised PoWPA adopt the whole of government and whole of society approach to ensure that everyone is included in its implementation. The following stakeholder groupings should be included in the implementation of the next iteration of PoWPA:<br>▪ Parties<br>▪ Researchers<br>▪ Academia<br>▪ Donors<br>▪ Decision Makers<br>▪ Spatial Planners<br>▪ Policy Makers<br>▪ Civil Society<br>▪ Indigenous And Local Communities<br>▪ Business<br>▪ Private Sector<br>▪ Citizens |

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| The revised PoWPA, in its approach to implementation, should intentionally promote, facilitate and encourage regional and subregional trainings and workshops to strengthen the capacity of Parties and other relevant stakeholders to implement the programme and support the coordinated action. | South Africa suggests that the approach to implementing PoWPA could be revised to better reflect and guide the Parties on institutional, temporal and technical requirements of achieving Target 3, including clarifying and supporting the various institutional roles, creating partnerships, building capacity, and facilitating technology transfer. |
| Given that the PoWPA has not been updated by the Parties to the convention since its adoption in 2004 (Decision VII/28, Annex), now is the opportune time to update the timelines of the programme of work to align with that of KMGBF. We propose that indicative milestones to guide the implementation of the PoWPA be set towards the year 2030. In our view, the year 2030 milestones could help Parties align the implementation, monitoring and reporting on the programme with the implementation, monitoring and reporting on the KMGBF. | South Africa suggests that the PoWPA goals, targets and actions be updated to include a clear, global numeric targets and timelines to establish comprehensive, effectively managed, and ecologically representative national and regional systems of protected areas for terrestrial areas and marine areas as contained in Target 3 of the KMGBF i.e. *Conserve **at least 30%** of land, inland waters, coastal and marine areas **by 2030** through protected areas and other effective area-based conservation measures (OECMs),* with emphasis on ecological representativity, connectivity, effective management and equity. |
| **D. Which goals, targets, or activities of the Programme of Work should be prioritized to support national implementation of the Framework by 2030?** | |
| **Key issues and rationale** | **Recommendations and proposals** |
| Recognising that not all 126 actions under PoWPA can be implemented with equal intensity before 2030, South Africa suggests prioritising a subset of goals and activities that are particularly important for achieving Target 3, including strengthening national monitoring systems. | South Africa proposes the prioritisation of the implementation of activities by 2030, related to the following aspects:<br>- Goal 1.1: Establish and strengthen national and regional systems of protected areas integrated into broader land- and seascapes. The focus on ecologically representative and connected Marine Protected Area Systems and Conservation Estate. South Africa's MPA network is large but uneven in representativity and connectivity. The current NBA assessment, in particular the marine systematic conservation analysis and planning is improving on the two aspects for the expansion of South Africa's marine conservation estate. |

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| | - Goal 3.1 (Policy frameworks): (Highlight activities that ensure national laws and policies explicitly support OECMs, connectivity conservation, and the development of coherent biodiversity information and monitoring policies).<br>- South Africa is actively exploring the development of a legal framework for OECMs under the National Environmental Management: Biodiversity Act (NEMBA). This legal framework takes the form of a norms and standards document that aims to set out norms, standards, and indicators for each criterion that a terrestrial, marine and coastal area must meet in order for that area to be recognised as an OECM. The intended norms and standards, therefore, are aimed at providing for a consistent and transparent process, recognising the voluntary and free, prior and informed consent principles to recognise, report on, and monitor OECMs in South Africa.<br>- Goals 3.2–3.4 (Capacity, technology and finance): (Sustainable financing of the whole PoWPA from establishment to post-establishment; Resource mobilisation; Capacity development and technology transfer, including through the Technical and scientific cooperation support centre established under the CBD).<br><br>- Strengthening government programs (for instance, the Expanded Public Works Programmes [EPWP] or game donation) that have the potential to deliver socio-economic benefits and support community-led transformation and OECMs |