

Submission in Response to [CBD Notification 2025-044](#):

"Invitation to submit information on the inclusion of additional headline, component and complementary indicators for the monitoring framework for the Kunming-Montreal Global Biodiversity Framework"

Thank you for the opportunity to provide input on the inclusion of additional headline, component, and complementary indicators under the KMGBF monitoring framework (CBD Notification 2025-044).

This submission was prepared by members of the Human Rights and Biodiversity working group. Individuals and organisations involved in drafting this submission include: Lou Darriet (SwedBio), Meenal Tatpati (Women4Biodiversity), Jessica Campese and Emmanuel Nuesiri (CEESP), Neema Pathak Broome (ICCA Consortium), Florian Doerr (GIZ), Dyo-Ann Guillao (Indigenous Peoples Rights International), Wara Iris Ruiz Condori (Indigenous Peoples Rights International), Elisa Marchi (ASU); Phil Franks (IIED), Amelia Arreguin (CBD Women's Caucus)

This submission includes:

- A call for responsive, ongoing development of the monitoring framework, the metadata sources and methods used in its application, and related guidance and capacity building efforts. These recommendations are offered in line with [Decision 16/31](#), which has requested the Executive Secretary of the CBD to work with relevant organisations to update metadata, especially for those indicators that need further development (see paragraph 30(a)).
- Suggested new indicators, as well as amendments to existing indicators, aimed at advancing a human rights-based approach (HRBA) to GBF implementation, including by addressing critical gaps. This includes gaps and recommendations noted by the AHTEG on Indicators, e.g. in relation to monitoring Section C (see [COP/16/INF/3](#) and [COP/16/INF/4](#)). The gaps identified by the AHTEG have also been noted in [Decision 16/31](#), paragraph 5. While many of these additional indicators fit the criteria outlined in this submission, some would need further development related to methods and metadata sources; these are included as examples of indicators that could be incorporated going forward.

Section C Indicators: HRBA, gender equality and intergenerational equity

Gaps: Section C principles and considerations are not fully operationalized through current headline, component, or complementary indicators. COP-16/INF/3 guidance clearly states (p. 23, para. 79) that "indicators are needed to monitor progress in the application of the cross-cutting approaches" in Section C of the KMGBF, including the human rights-based approach, gender equality, and intergenerational equity.

Further, the UN-Permanent Forum on Indigenous Issues has underlined that it is the responsibility of Member States and other actors to obtain free, prior and informed consent directly from Indigenous Peoples when developing policies and legislation pertaining to conservation measures and protected areas¹. Ultimately the monitoring framework and its implementation need to reflect and respond to the broader context of past and ongoing conservation-associated and other human rights violations² and international human rights law, including UNDRIP. The Human Rights Council³ has, for example, reinforced that policy and processes of states should align with the United Nations Declaration of Rights of Indigenous Peoples.

Further, there exist persistent information gaps pertaining to gender equality and intergenerational equity in relation to the GBF as a whole, and particularly to area-based conservation. Measuring related dynamics is therefore of high importance for Section C to be fully observed.

Proposals: Additional indicators and considerations that we recommend exploring in further development and implementation of the monitoring framework include:

- Amend relevant existing indicators—particularly under Targets related to people (including, but limited to, Targets 3, 21, 22, and 23) to explicitly require sex- and age-disaggregated reporting.

Goal D and Target 19: Direct funding to Indigenous Peoples and local communities, women and youth

- **Gap:** No current, comprehensive indicators measure *equitable* access to biodiversity finance or capacity-building, particularly for Indigenous Peoples, local communities, women, and youth. According to the report of the Special Rapporteur on the rights of Indigenous Peoples titled, "[Green Financing- A just transition to protect the rights of Indigenous Peoples](#)", prepared pursuant to Human Rights Council Resolution 51/16 there is a lack of transparency, reporting and monitoring mechanisms on commitments to support IPs under both the UNFCCC and the UNCBD. The report also states that current funding must adopt a HRBA and redress gaps in funding for IPs for their own renewable energy, climate action and conservation projects

Proposals:

Drawing on indicators included in Decision 16/31:

- Equity and accessibility related complementary indicators for Goal D in the current framework could be incorporated as disaggregated elements of the headline indicator to help address this gap. These are:
 - International funding targeted at indigenous peoples and local communities within biodiversity-related activities
 - Domestic funding targeted at indigenous peoples and local communities within

¹ Paragraph #46 Session #22 (2023)

² <https://rightsandresources.org/publication/report-special-rapporteur-human-rights-council-rights-indigenous-peoples/>

³ Resolution 57/28

- biodiversity-related activities
- Private funding targeted at indigenous peoples and local communities, within biodiversity-related activities
- Private funding mobilized for indigenous peoples and local communities, women and youth

Additional components that we recommend considering going forward include:

- Adding explicit reference to disaggregation of funding related indicators by gender and youth

Target 3: Advancing equity and rights in area-based conservation

Enabling appropriate recognition of Indigenous and traditional territories through all pathways

- **Gaps** - [As identified in COP/16/INF/4](#) (particularly section 3, *A Gap analysis of the KMGBF monitoring framework*, ref to Target 3 at p.39) “No disaggregation of the Headline Indicator 3.1 (Coverage of protected areas and other effective area-based conservation measures) is yet possible by indigenous peoples and local communities thus it cannot inform on the recognition and respect of the rights of indigenous peoples and local communities, including over their traditional territories...” Headline indicator 3.1 needs to include ITTs as a third pathway towards recognition of contributions to conservation (apart as a potential disaggregation of PAs and OECMs).
- **Proposals** - SB8j will be developing guidance on ITTs and on Targets 2 and 3. It is crucial that Headline Indicator 3.1 in the GBF Monitoring Framework be reviewed and updated to reflect this guidance from SB8j once it has been negotiated and adopted.

Ensuring that human rights, including FPIC and participation, are fully considered in relation to decision-making about area-based conservation

Gaps - Existing indicators for Target 3 leave several important gaps related to human rights-based elements, including participation of Indigenous Peoples’, local communities, and women in decision-making processes, and FPIC in relation to formation or expansion of Protected Areas and OECMs and for legal recognition of Indigenous and traditional territories.

Proposals

New or amended indicators with known metadata include:

- Further develop and re-incorporate, as a headline or component indicator, an indicator on the number of countries implementing national legislation, policies or other measures regarding FPIC related to conservation. This indicator was previously included in CBD Decision 15/5

Additional components and indicators that we recommend considering going forward include:

- Add indicator that specifically addresses the requirement to uphold FPIC in relation to declaration, recognition, and expansion of protected areas and OECMs. With recognition that the monitoring framework must be addressed as a whole, these elements could be incorporated into indicators for Target 22 or Target 3.
- Add additional indicators to further reflect the rights of Indigenous Peoples related to their conservation efforts and security of tenure in relation to area-based conservation - e.g. (based on availability of meta-data and where consistent with / supported by the recommendations of IP & LC representative bodies). These include:
 - Reported cases of indigenous people being evicted from their homes by government and armed security forces,
 - proportion of indigenous peoples displaced from their traditional LTR,
 - Incidence of arrests and harassment faced by indigenous peoples for engaging in sustainable livelihoods and customary practices.
- Component level indicator on the number of PAs where Indigenous Peoples and local communities meaningfully participated in the process to develop the management plan, e.g. participated in the relevant meetings and workshops. While specific metadata sources would need to be identified, this could be assessed using standard literature review or other relevant, publicly available information
- Adopt additional recommendations for Target 22, and capacity development (below), which will collectively strengthen human rights integration in Target 3 implementation, including by ensuring that Target 3 monitoring incorporates cross-cutting and implementation related commitments in the GBF.

Strengthening monitoring of equitable governance

- **Gaps:**
 - While the current Headline and complementary indicators are intended to include some information about the frequency and outcomes of governance and equity assessments, including as a component of effectiveness, there are open questions and likely gaps in terms of the comprehensiveness of this data.
- **Proposals:**
 - Return the indicator on number of sites having completed a site-level assessment of governance to being a component (vs complementary indicator)
 - Expand the scope of this indicator to include assessments of OECMs, as many such assessments can equally be applied to and are relevant for OECMs
 - Once the recommendations on ITTs have been developed by SB8j, further develop the existing indicator re: coverage by governance type to ensure the target, and its methods and guidance for implementation, reflect this guidance
 - We further recommend that the developing methodology include guidance to ensure appropriate assessment approaches and data governance for (composite and disaggregated) indicators on equitable governance, prioritizing rights-holder led and participatory assessment processes with FPIC.

Target 22 - Strengthening monitoring of full and equitable participation

Gaps: As noted above, while we welcome the existing indicators pertaining to the nature and quality of participation under Target 22, including Indigenous Peoples and local community participation in decision-making, we note that there are pressing, remaining gaps. There is also need to more explicitly address the need for full, equitable participation in decision-making about area-based conservation, either under Target 22 and/or Target 3.

Proposals:

New or amended indicators with known metadata include:

- Include existing LANDex indicator 3c ("Rural men and women living on community land who perceive their rights are secure") as a measure for disaggregated data on gender as well as secure land tenure.
https://d2znjf2o4e8a2t.cloudfront.net/media/documents/Methodology_3C_MASTER.pdf

Additional components and indicators that we recommend considering going forward include:

- Add a new component level indicator, or amend the existing indicator by adding additional text, to specifically address Participation in decision-making of indigenous peoples and local communities in the establishment and management of protected areas and other effective area-based conservation measures

These would provide indicators for equitable governance and respect for procedural rights at component level for which there are existing, practical methods for monitoring

Addressing capacity needs and ongoing development of indicators and methods

Advancing an HRBA to GBF implementation, in line with commitments in Section C and across multiple Targets, requires ongoing monitoring and responsive, accountable action.

While we appreciate the call for indicators for which there is fully developed metadata and related methods, we also strongly encourage the Secretariat and Parties to be adaptable and responsive to evolving knowledge and circumstances, including by remaining open to indicators for which further data and method development may be needed, as well as potential for new indicators that may be identified / developed going forward. While it is important to have a monitoring framework that is as complete as possible at this stage, there is also need to ensure that the framework and its implementation reflects and responds to important, ongoing discussions regarding, among others:

- Appropriate / self-determined recognition of Indigenous and traditional territories
- Reporting by non-state actors, including in relation to Target 3

We also strongly encourage SCBD and Parties to take into account capacity-building needs around the development and use of indicators. Here, we underscore the importance of addressing capacity-related gaps as identified in **CBD COP-16/INF/4**, particularly in the disaggregation of data by right-holder groups and in monitoring governance and equity dimensions.

Therefore, we recommend that the CBD Secretariat and Parties:

- Include a methodological annex or guidance note within the monitoring framework to outline best practices, including for collecting and reporting data related to equity in area-based conservation, as well as sex and age-disaggregated data, ensuring consistency, ethical standards, and alignment with international benchmarks, such as SDG 5.
- Ensure capacity development support to improve data collection and disaggregation for human rights-relevant indicators. UN-OHCHR has developed a comprehensive framework of Human Rights Indicators in line with the Sustainable Development Goals indicators. The guidance is available here:
https://www.ohchr.org/sites/default/files/Documents/Issues/HRIndicators/SDG_Indicators_Tables.pdf
- Foster collaboration with human rights institutions, Indigenous Peoples and local communities organizations, women networks, and gender/youth networks in indicator development and data collection

We welcome the opportunity to engage further in refining indicators that ensure the monitoring framework fully reflects a HRBA and supports equitable and inclusive biodiversity action.