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ICLEI – Local Governments for Sustainability - Cities Biodiversity Center

ICLEI – Local Governments for Sustainability is a global network of more than 1,750 local and regional governments committed to sustainable urban development.

Physical Address
Unit 1, 2nd Floor, South Tower, Sable Park, 14 Bridge Boulevard, Century City, 7441

Postal Address
PO Box 5319, Tygervalley, 7536
South Africa

Phone
+27 21 202 0381

E-mail
iclei-africa@iclei.org

Website
www.africa.iclei.org

Non Profit Company (NPC)

VAT No. 4400266807

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Astrid Schomaker
Executive Secretary
Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
413 Saint-Jacques Street, Suite 800
Montreal, Quebec, Canada
H2Y 1N9

Dear Ms Schomaker,

Re: Submission of views and information on the inclusion of additional headline, component and complementary indicators for the monitoring framework for the Kunming-Montreal Global Biodiversity Framework

Ref.: SCBD/IMS/NP/JEC/KM/92144

The urgency for vertical integration—from policy design to on-the-ground implementation—has never been more critical. The Kunming-Montreal Global Biodiversity Framework underscores the need for a whole-of-society and whole-of-government approaches to halt and reverse biodiversity loss. As the crisis unfolds most visibly at local and subnational levels, effective implementation depends on multilevel governance where local action aligns with national commitments, bridges jurisdictional divides, and fosters coordinated delivery of the GBF targets across all levels of government.

ICLEI- Local Governments for Sustainability Cities Biodiversity Center submits the feedback and proposals below to address the gaps in the Monitoring Framework (CBD Decision 16/31) with the purpose of enhancing coordination and cooperation, minimizing duplication of efforts, and maximizing the efficient use of resources that will empower both Parties and cities to create resilient, livable, and sustainable environments for present and future generations.

Target 3- *Ensure and enable that by 2030 at least 30 percent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.*

- The current indicator measures the area of protected areas and OECMS, but it would be valuable to also measure the progress and the impact of these areas at subnational and local level

Target 5 *- Ensure that the use, harvesting and trade of* ***wild species*** *is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spill-over, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.*

- The current indicator associated with this target is narrow in scope. The headline indicators', primarily focuses on fish species, which does not fully capture the breadth of the target's intent. GBF Target 5 does not restrict its application to fish or aquatic species; rather, it encompasses all wild species — terrestrial, freshwater, and marine — that are subject to use, harvest, and trade. This causes limitations in terms of taxonomy but also the ecosystem type taken into consideration.

  We recommend broadening the scope of the indicator to include all wild species that are harvested, used, or traded, regardless of ecosystem or taxonomy. This would ensure a more comprehensive and aligned measurement of progress toward the full intent of Target 5.

Target 6: *Eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or*

potential invasive alien species by at least 50 per cent, by 2030, eradicating or controlling invasive alien species especially in priority sites, such as islands.

- While the indicators measure the rate and the spread of invasive alien species it does not effectively measure the action for mitigation

Recommendation

- It would be of great benefit to measure the existence and enforcement of national, subnational and local IAS legislation and action plans, as well as control, eradication and monitoring measures
- Measure funding allocated to IAS prevention and control (at all levels)

Target 7 *- Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on science, taking into account food security and livelihoods; and also preventing, reducing, and working towards eliminating plastic pollution.*

- This includes a focus on reducing excess nutrients, minimizing pesticide and chemical risks, and explicitly **preventing, reducing, and ultimately eliminating plastic pollution**. Suggest that specific indicators measuring plastic waste/pollution is included since the target directly speaks to that
- Indicators are quite local level focused and ask about municipal waste. Consider adding more indicators that take into consideration how waste is measured on a regional/subnational level. Such indicators may also overlook **informal waste sectors** and rural areas where pollution monitoring is limited. Lastly, incorporating broader geographic metrics would improve understanding of systemic pollution trends and facilitate more coordinated interventions.

Target 8*- Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solution and/or ecosystem-based approaches, while minimizing negative and fostering positive impacts of climate action on biodiversity.*

- Suggest measuring heat island effect, flooding, water eutrophication and coastal erosion specifically when considering climate change and possibly track solutions for cooling, flood attenuation and other mitigation measures through the use of nature-based solutions and/or ecosystem based approaches
- Although the target highlights Nature based Solutions and ecosystem-based approaches, current indicators do not **explicitly measure the scale, quality, or biodiversity outcomes of NbS projects**. Without this, it's difficult to assess how effectively these solutions contribute to both climate resilience and biodiversity goals.
- Suggest when measuring the portion of local governments supported to specify “within subnational boundaries”

Target 9 - *Ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and local communities.*

The current indicators lack sufficient specificity and depth to adequately capture the dimensions of sustainable wild species management and its social outcomes.

- One indicator references traditional occupations related to biodiversity, but **does not define or disaggregate what is meant by "traditional occupations."** This creates ambiguity, especially across diverse cultural and national contexts. Suggest indicator specifies what is meant by traditional occupations specifically in relation to what the target is trying to measure
- Suggest specific indicators for measuring the **management** of wild species - consider asking around the policies that exist that outline these practices

  Recommendation: Introduce **specific indicators that measure the existence, quality, and implementation of national or local policies and frameworks** that govern wild species management. For example:

  - Number of countries or jurisdictions with formal strategies or policies for sustainable wild species use;
  - Proportion of wild species use that is governed under community-based management regimes or co-management agreements;
  - Inclusion of customary law in species management practices.

Target 10- *Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches contributing to the resilience and long-term efficiency and productivity of these production systems and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services .*

- Suggest to measure policies that include biodiversity practices in a city/region/country. Without this, it is difficult to assess the **enabling conditions for large-scale adoption** of sustainable practices
- Existing headline indicators focus almost exclusively on agriculture, with little to no coverage of aquaculture, or fisheries—despite their explicit inclusion in the target.

Recommendations:

- Aquaculture: Proportion of farms using ecosystem-based or integrated multi-trophic aquaculture practices
- Fisheries: Proportion of wild fish stocks managed using ecosystem-based approaches, including bycatch reduction and habitat protection.

Target 12- *Significantly increase the area and quality and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature and contributing to inclusive and sustainable urbanization and the provision of ecosystem functions and services.*

- The current indicator emphasises the physical presence of green and blue spaces but **does not capture whether countries or municipalities are proactively planning for or prioritizing the expansion and improvement of such spaces** through their urban development policies. Suggest that the indicator includes measuring the amount of policies that include the creation of green spaces specifically for their urban planning
- The indicator also provides limited insights with regards to the space's accessibility - suggest complementary spatial indicators which look at accessibility metrics, such as the percentage of the urban population within a 10-minute walk to a public green space
- Measuring green space coverage alone **does not reflect the ecological quality or biodiversity value** of those spaces.

  Recommendation: Add indicators to track:

  - The proportion of urban green/blue spaces managed to support **native biodiversity**;
  - **Connectivity** between green/blue spaces to support urban wildlife movement;
  - Inclusion of green infrastructure elements that support multiple ecosystem services.
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Target 13*- Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilization of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030 facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.*

- Although traditional knowledge is explicitly mentioned in the target, there are **no clear indicators that track its use in relation to genetic resource access or**

benefit-sharing mechanisms. This undermines efforts to recognize and protect the contributions of Indigenous Peoples and local communities (IPLCs), who are key holders of such knowledge. Suggest that indicators include measurements for the use of traditional knowledge

Recommendation: Introduce indicators that measure:

- The **number or proportion of benefit-sharing agreements that include components related to traditional knowledge**;
- Legal or policy frameworks that **recognize and protect traditional knowledge** in access and benefit sharing processes;
- The **involvement of Indigenous Peoples and local communities** in the negotiation and implementation of access and benefit sharing agreements.

- Develop indicators that reflect training, funding, or institutional support provided to IPLCs to participate in access and benefit sharing processes and safeguard their knowledge systems

Target 14 *- Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, fiscal and financial flows with the goals and targets of this framework.*

- The **current indicator framework does not effectively measure the actual inclusion of biodiversity into policies and decision-making processes** across sectors and levels of government. This is a critical gap, as policy integration is a foundational driver of biodiversity mainstreaming.

Target 16- *Ensure that people are encouraged and enabled to make sustainable consumption choices including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.*

- While the target outlines important actions like establishing supportive frameworks and improving education, there is currently no indicator that measures the effectiveness of public awareness campaigns or information dissemination on sustainable consumption at the local and national levels. Without tracking **public engagement and understanding**, it is difficult to assess the overall impact of awareness efforts in influencing sustainable consumption behaviors.