



# The ingredients for a successful GBF

The elements that should form part of it and those that shouldn't  
And the reasons why

# Mission

## Element that should be part of the target

- “**Halt**” biodiversity loss, in addition to and **before recovery**

Halting the loss of biodiversity is paramount, not just to slow down its rate. It needs to be given precedence over restoration and recovery- because species that are extinct cannot be restored. So, preserving existing biodiversity needs to be the top priority and is not automatically included in “recovery”.

A distinction between loss and recovery is also needed to avoid offsetting.

This language also needs to be included to avoid regression from the strategic plan 2011-2020 and its mission and to ensure coherence.

Concepts of net gain/no net loss/nature positive should not be in the Mission

## Elements to be replaced

- “Put biodiversity on a path to recovery” by “ensuring biodiversity/ecosystem long-term recovery and health/integrity”

“To put biodiversity on a path to recovery” is not measurable, and is weak.

# Goal A

## Elements that should be part of the goal

- “Halt the loss of species & Increase the restoration”

The goal needs to be oriented to halting the loss of both all species and all ecosystems, and to restore (=increase) biodiversity. These need to be measured separately, so as to maintain an understanding of both evolutions.

- Managed or semi-natural ecosystems

In some regions with a long cultural history, valuable and biodiverse semi-natural habitats such as some types of grasslands have evolved over millennia in direct interaction with IPLC cultures and communities which need to be preserved in the same way as entirely natural habitats.

- Increase areas of ecosystems and species abundance to 20%

In line with target 2, a 20% increase of habitats seems ambitious but realistic.

- Genetic diversity

Genetic diversity must be fully maintained and safeguarded in situ where possible

## Elements that should NOT be part of the goal

- Net gain / No Net loss / Net Zero/nature-positive/ Net improvement

“Net gain” or “no net loss” allows for biodiversity to be destroyed in one place with the promise of reinstating or protecting it somewhere else (=offsetting). This facilitates the destruction of biodiversity. Such compensatory schemes have proven to fail in practice and actually allow for more destruction of biodiversity. They often result in gendered, negative social and environmental impacts. It also denies the importance of local biodiversity for community livelihoods, including in particular for women and Indigenous Peoples.

## Elements to be replaced

- 10% reduction of extinction rate with **eliminating** or **halting** human-induced extinctions

In order to halt biodiversity loss, and thus to ensure coherence with the previous mission and SDG 15.5., extinction must of course be **halted** as well. A mere reduction of the extinction rate is not sufficient.

## Goal B

### Addressing elements in the right order

This Goal is about the benefits nature provides for people through sustainable use. The benefits for people are a result of using them sustainably. Therefore, the goal should put “Biodiversity being used sustainably” at centre and first, and only then, through this, “ensuring the long-term integrity of ecosystems and maintaining and restoring nature’s contributions to people”.

### Elements to be replaced

- “Ecosystem services” by “Ecosystem functions”

Ecosystem functions are well defined under the CBD. The word services is a market term, and suggests that the main function of ecosystems is to serve human requirements.

- “Fully accounted” by “biodiversity monitoring to ensure the achievement of the GBF”

Accounting as an economic monetary way of considering the environment can be counterproductive and lead to commodification of nature. The real aim is to monitor in a consistent way if the GBF gets achieved.

### Elements that should be part of the goal

- The right to a clean, healthy and sustainable environment

Respect of human rights, including the recently approved by the HR Council Right to a Healthy Environment, are key to achieving rapid and ambitious progress in the protection, conservation and sustainable use of biodiversity

- **Equitable** conservation and sustainable use

A major cause of biodiversity destruction arises from the profound inequity between regions and within countries and it is therefore vital to tackle this issue according to CBDR, taking also into account historical patterns of production and consumption

- Sustainably and equitably governed and managed ecosystems

Good governance and management of conserved ecosystems are key. The IPBES has particularly noted the vital contribution of Indigenous Peoples, and further securing recognition of their territories is essential.

### Elements that should NOT be part of the goal

- Nature Based Solutions (NBS)

The term nature-based solutions is being used in many different contexts with different definitions and implementations, many of which are counterproductive for the environment. In particular, offsetting and greenwashing NBS-projects by corporations can undermine real biodiversity benefits. Furthermore, most NBS- projects are heavily climate oriented, often even at the peril of biodiversity.

- “Value”

Value could lead to financialisation of Nature

# Goal C

## Main elements central to the goal

Fairly and equitably sharing benefits, in sustainable ways and particularly with IPLCs - prioritising benefits for how human rights to food, health, livelihood and clean environment can be implemented equally for all by more sustainable use of biodiversity than the use determined by commercial market demands.

## Elements that should be part of the goal

- Digital sequence information

A goal addressing the 3rd objective of the CBD that does not include Digital Sequence Information will not keep up with the developments in technology that are currently allowing access without benefit sharing.

- Associated traditional knowledge

The CBD and Nagoya Protocol on Access and Benefit Sharing apply also to traditional knowledge associated with genetic resources within the scope of the CBD and to the benefits arising from the utilisation of such knowledge

- Fair and equitable sharing of benefits in particular with IPLCs

IPLCs play a key role in the conservation and sustainable use of biodiversity. Benefits that are equitably shared with them is a matter of justice, and will also ensure better stewardship of biodiversity.

## Elements that should NOT be part of the goal

- 'Increased monetary benefits that undermine biodiversity'

Increase of 'monetary benefits' should not be allowed to capture biodiversity away from more sustainable, less commercial use and benefits.

- Open access

The objective of the CBD and the Nagoya Protocol is the fair and equitable sharing of benefits arising from the utilisation of genetic resources. It is not about open access.

## Elements that should be part of the goal

- Human rights to be prioritised as sustainable human benefits.

Degradation and loss of biodiversity often result from and reinforce existing patterns of discrimination, and that environmental harm can have disastrous and at times geographically dispersed consequences for the quality of life of indigenous peoples, local communities, peasants and others who rely directly on the products of forests, rivers, lakes, wetlands and oceans for their food, fuel and medicine, resulting in further inequality and marginalization. (HR council, 46th session)

# Goal D

## Elements that should be part of the goal

- By 2025 the resources gap needs to be closed

Every year with a finance gap implies a year with lack of resources for biodiversity

- Common But Differentiated Responsibilities, in accordance with Article 20 of the Convention

This obligation for developed Parties to provide new and additional financial resources to enable developing country Parties to implement the CBD, has not been met. Equity is the key to unlocking implementation and must be included.

➤ New and additional financial resources

Financial resources should be ‘new and additional’, as stipulated in Article 20. Focusing on ‘all sources’ dilutes the obligation for developed country Parties to provide new and additional financial resources to enable developing country Parties to implement the CBD. It also opens the door to private sector financing. There should not be double counting of the financial resources provided.

➤ Resources to control global business & consumption that drive biodiversity loss in poor states

A crucial reason for the gap in the means of implementation is this lack of independent control and regulation of these drivers of global biodiversity loss. This loss will continue to accelerate, if this gap in the ability to control and regulate the commercial drivers of biodiversity loss is not closed.

➤ When talking about the means of implementation, any technology transfer needs to be accompanied by technology assessment

This is to ensure that the technologies are appropriate, sustainable and do not pose risks.

Elements that should NOT be part of the goal

➤ Private sector

Private sector finance comes with benefits for those businesses involved, else they would not invest. Thus, this finance has more often than not a conflict of interest. A lot of the private sector finance is oriented to offsetting. In as far as offsetting is just replacing one area with another, payments for this cannot be counted as biodiversity finance. It is also important to note that private sector finance is unpredictable and has limited scope.

## **New Proposed Goal E: Effective Implementation**

In addition to taking a decision on an improved implementation framework, which is outlined in Section J of the GBF and CBD/SBI/3/CRP.5, there must be a goal to improve implementation. Experience from the Aichi targets shows that only the goals and targets will be respected and followed up in the long term. The GBF therefore needs to address the CBD and all of its obligations in its entirety, including enabling conditions and means for implementation, and if this is not the case, the Implementation mechanism must do so.

Main elements that should be part of the target

➤ Alignment in the structure and timing of NBSAPs and National Reports

NBSAPs need to be updated within two years of the adoption of the GBF (Details in CBD/SBI/3/CRP.5 and CBD/SBI/3/11/ADD 4). Any use of NBSAP, National reporting or other means of CBD implementation have to take into account all obligations of the CBD and fully comply with them, including any of those not dealt within the GBF. Two years are needed to ensure sufficient time for fully participatory processes.

➤ a peer review mechanism that enables discussion and sparks targeted additional action

Main tool for this is a standardised country-by-country peer review mechanism under the open-ended forum (CBD/SBI/3/11/ADD 5). This needs to include a data collection and report phase,

a phase in which the results will be discussed with peers (scientists, NGOs, other CBD Parties) and a ratcheting up phase in which additional measures to ensure the targets are reached are taken.

➤ Addressing compliance

The Convention should have a compliance mechanism that makes it possible for Parties and civil society organisations to trigger actions for non-compliance of the Convention and hold parties accountable in an equitable manner and on the basis of types of national challenges encountered. Compliance must also address developed country Parties' compliance with their financing obligations to developing country Parties. If Parties do not comply there should be appropriate implications.

CITES, the Aarhus Convention and the Bern Convention have proven that such mechanisms can work well and help implement the agreements.

Compliance must also address developed country Parties' compliance with their financing obligations to developing country Parties

➤ Equity and equitable participation

Any proposal for effective implementation must operationalise equity by providing the resources to developing country Parties to implement their CBD obligations, and for them to also meet additional planning, monitoring, reporting and review requirements. A peer review mechanism could help identify additional needs and enable donors to direct resources accordingly. Implementation measures should also be differentiated in an equitable manner and on the basis of types of national challenges encountered.

Elements that should not be part of the goal

➤ NBSAPs should not rely on the work of, and commitments by, business actors.

Any self-reporting by business about their activities should be independently verified and not be part of official reporting (National reports), as it is states parties which are responsible for the achievement of the CBD.

The proposed "voluntary commitments" should not be part of the enhanced mechanism for planning, review and reporting, with the same rationale.

Further reading on goal

- CBDA submission at virtual session of SBI-9 (March 2021):  
<http://www.cbd-alliance.org/sites/default/files/documents/Agenda%20item%209.%20Mechanism%20Review.pdf>
- Joint NGO reactions by RSPB, ClientEarth, Friends of the Earth Europe, BirdLife International, WWF to online consultation (Feb. 2022):  
<https://www.cbd.int/sbi/review/submissions.shtml>

## Target 1: Planning

Addressing elements in the right order

➤ 'Ecosystems and halting their loss' needs to be at the centre of the target.

This is a follow-up of Aichi target 5, and should be in line with Goal A

Elements that should NOT be part of the target

➤ Remove "spatial" from "spatial planning"

Spatial planning can be a tool to address halting ecosystem loss, but it is not done in a biodiversity-supportive equitable and participative way across the globe. There are other suitable planning tools as well.

There is a danger that spatial planning could be used to identify areas for development and for offsetting, rather than as a tool for environmental integrity.

#### Elements that should be part of the target

- Land use change & Land use intensification

The target should make explicit use of “land use change” and “land use intensification” **as major drivers of biodiversity loss** and seek to halt them.

- Natural Forests

This is a continuation of Aichi target 5 to halt the loss of ecosystems, of which forests were a key element.

The CBD also needs to work with a definition of NATURAL forests, as the FAO definition includes monoculture tree plantations, which undermine biodiversity. Therefore, this definition is not compatible with the objectives of the CBD.

- Biodiversity-supportive planning

It is not sufficient to include biodiversity in the analysis of the planning process, but also to ensure that the plans actually **support** biodiversity, i.a. by defining no-go areas for for-profit activities or priority areas for biodiversity.

- Equitable Governance based participative” planning

Planning and Governance only work if there is ownership and/or governance rights over it by rightsholders and it gets widely supported. This will only be the case if land rights are fully respected and those who have interests in the area can participate in the planning process.

- Prioritising indigenous and other customary tenure rights.

Such planning can provide an additional tool for recognition of IPLCs rights, at a stage much earlier than designation/recognition of area-based conservation measures

- Full respect for Human Rights

As people need biodiversity primarily and necessarily to sustain the realisation of human rights to food, health, water, shelter, livelihood/work and clean, healthy & sustainable environment, such biodiversity shall not be wasted for other priorities. Human use of biodiversity must primarily sustain and fulfil human rights equally for all.

#### Elements to be replaced

- “Biodiversity inclusive” by “biodiversity supportive”

Biodiversity-supportive more precisely conveys the idea that processes and activities that are not protecting or sustainably using biodiversity should not be encouraged. Biodiversity is the foundation of life

## Target 2: Degraded ecosystems

#### Elements that should be part of the target

- Restoration

Restoration is important, though it should be worded in a way that it cannot be misused as an excuse for biodiversity destruction in other areas.

- Definition of “degraded ecosystem” in the glossary.

While restoring degraded ecosystems can be a valuable contribution to improve the state of biodiversity, it should be clear what exactly counts as degraded. Ecosystems that are defined, in land use maps and policies, as degraded are sometimes used by IPLCs in ways that are not understood by non-IPLCs.

- Enabling and supporting restoration initiatives of indigenous peoples and local communities.

IPLCs have traditional knowledge on improving the ecosystems they live in.

- With the full and effective participation of IPLCs

Some ecosystems which could be defined as degraded are effectively part of a bigger territory being governed or managed by IPLCs, and their use of this part of the area is what enables the proper conservation of other areas. Changing such destinies would require proper participation.

#### Elements that should NOT be part of the target

- Mentioning of restoration in a way that includes destruction & offsetting

Restoration in itself is very important, but its benefits get undone when restoration is actually a compensation for destruction elsewhere.

## Target 3: Conserved areas

#### Main elements to be addressed in this target:

- Purpose and total area
  - Purpose of conserved areas is to maintain species and habitats in a good conservation status and within planetary boundaries
  - Sufficient total amount of area-based conservation measures to ensure that all threatened species and ecosystems are adequately protected in order to remain within the planetary boundaries

More areas to protect endangered species are needed, but there needs to be a specific focus on the purpose of area-based conservation, which is “to ensure that wild flora, fauna and habitats are maintained at, or restored to a favourable conservation status”.

- equitably governed and effectively managed

Protected areas can only deliver when they are effectively governed and managed (so that they produce the outcomes for which they were designed). Unfortunately, there are too many conserved areas that are no more than paper parks.

- ICCAs as a specific and priority category in area-based conservation

Given the important role that areas governed by IPLCs have in conserving biodiversity (cf. IPBES global assessment report), they need to have preference over protected areas and other community-based conservation measures where applicable.

- Full respect for human rights, including FPIC

In many countries, the top down installation of protected areas has led to evictions combined with violence and other human rights infractions. These must be absolutely avoided, both through highlighting in the target (including the need for free prior and informed consent) and through monitoring the respect of Human rights obligations related protected areas in all parties, with a specific headline indicator.

#### Elements that should NOT be part of the target

- Any reference to or possibility for conservation which excludes IPLCs or people in general (often referred to as “Fortress conservation”)

Protected and conserved areas should be made conditional on the recognition of the rights of IPLC including FPIC.

Indigenous territories and the lands of local communities need to be included in the definition of conserved areas, and designation and governance need to be inclusive and participative everywhere/

#### Elements that should be part of the target

➤ Respect for the rights of IPLCs with explicit reference to UNDRIP and UNDROP  
IPLCs and ICCAs have demonstrated to be the best guardians of nature, wherever this is applicable. However, their rights have been violated often in the name of nature conservation. Therefore, all future area-based conservation needs to take into account their rights.

➤ Governance by IPLCs

- Recognition of importance of IPLCs in the equitable governance and effective management of such areas,
- Recognition of the areas governed by them.

Governance by IPLCs is essential as this is the principal way in which they can ensure conservation. Furthermore, this is the only fair and equitable way. In order for them to be able to govern their areas effectively, their traditional governance structures, and well as their territories, need to be properly recognised.

➤ Participative, equitable and gender-just governance, as well as effective management  
Protected areas only deliver when they are developed and governed participatively and equitably and gender justly.

➤ Ecological representativity

Conserved areas should be designated in places where the species and habitats under threat occur and represent all of the diversity of habitats and species, in all regions etc.

➤ Ecological connectivity

Isolated “islands” of conserved areas surrounded by degraded areas, or areas where potentially biodiversity-destructive activities are undertaken, by definition cannot be effective. Thus, the designation/recognition of conservation measures should constitute a broader ecologically coherent network.

#### Further reading on this target:

- Simon Counsell, ‘Conservationists claim that their aim to place thirty per cent of the planet in protected areas by 2030 is supported by science. It isn’t. What the science does and doesn’t say about 30×30’, REDDmonitor March 2022, <https://redd-monitor.org/2022/03/07/conservationists-claim-that-their-aim-to-place-thirty-per-cent-of-the-planet-in-protected-areas-by-2030-is-supported-by-science-it-isnt-what-the-science-does-and-doesnt-say-about-3/>
- Why a 30 per cent blanket target on protected areas is not enough - F. Wulf in rural 21, June 2021 [https://www.rural21.com/english/current-issue/detail/article/why-a-30-per-cent-blanket-target-on-protected-areas-is-not-enough.html?no\\_cache=1](https://www.rural21.com/english/current-issue/detail/article/why-a-30-per-cent-blanket-target-on-protected-areas-is-not-enough.html?no_cache=1)

## **Target 4: Threatened species and the genetic diversity**

#### Elements to be replaced

- “Active” management should be “effective” management

Effective means “that which works, produces results” while active implies one does something, but it is not defined what

#### Elements that should be part of the target

- In situ

Conservation in the areas where species naturally grow / live is the most natural and safe way of conservation. Many species need their ecosystems, surrounding and / or upbringing in order to function well. This is also important for IPLCs and smallholder farmers developing and conserving agricultural biodiversity and holding in situ seed banks

- Community-based customary sustainable use (CSU), law, management, and monitoring  
CSU is Convention text (article 10c), and has its own Plan of Action

#### Elements that should NOT be part of the target

- Restoration of genetically depleted populations - Genetic restoration (de-extinction)

Genetic restoration refers to the use of genetic engineering technologies, e.g., gene drives, to “restore” populations of animals that are under threat of extinction. Gene drives are generally proposed to eliminate species. However, gene drives are also being proposed to change the genetic expression in a species, for the purported goal of reversing an extinction trend. There are extensive scientific concerns about both engineering animals and using gene drive technologies and the unintended and permanent consequences for wild species and ecosystems. The Convention’s aim should be to protect biodiversity, including at the genomic level.

## Target 5: Use of wild species

#### Elements that should be part of the target

- Non-detrimental

Well defined CITES Language. This wording also prevents countries from legalising destructive practices.

- In situ

Reference to CSU (in addition to legal as per legal and customary use) -otherwise many IPLC practices risk to be excluded as in many national legislations they are considered illegal  
Ensure that all trade and use of wild species allow them to regenerate sustainably, is safe for health of people and ecosystems and respects rights of customary sustainable use

- Avoid **or significantly** reduce human-wildlife conflicts

Stronger wording, more ambition

## Target 6: Invasive species

#### Main aim of target

- Further introduction of IAS should be avoided/stopped/prevented

It is vital to address the underlying causes of IAS: i.e., large monocultures where IAS multiply rapidly, chemical destruction of species that could use IAS as prey; Identify pathways of introductions and transfer of e.g.: plants around the world without proper measures to ensure

they are not harbouring potential IAS; the pet trade ..., use of pesticides that actually open up niches for new pests...

### Elements to be replaced

- “Manage pathways” to be replaced by “Avoid” or “Prevent” the introduction of IAS

It is highly unclear what “manage pathways” actually means

- Identify IAS

Continuous follow up of the appearance of new IAS is very important and pre-empting new introductions e. g through introduction pathways analyses. IAS can't be controlled without the awareness they are there, and early identification makes control easier.

- Control and eradicate in a sustainable manner

Ways of dealing with IAS should be environmentally sound and not generate new risks for the environment or other forms of degradation.

- “50%” by 80%

IAS are a major threat for biodiversity, ecosystems and sustainable, biodiverse agriculture, we need to control as many of them as possible. 50% is not sufficient

### Elements that should NOT be part of the target

- Gene drives

This is an example of ‘innovation,’ that has side- and long-term effects that are entirely unknown, unpredictable and could be devastating. The text should not be calling out specific technologies, and gene drive technologies should not be proposed as a tool in conservation of biodiversity

- Innovation and the use of new tools

Having language focus solely on ‘innovation’ opens the door for potentially high-risk synthetic biology technologies (e.g., gene drives) to be developed and adopted without assessment and comprehensive evaluations. The CBD should be addressing the underlying causes of invasive species. The text should emphasise traditional knowledge, and land management and stewardship

## **Target 7: Pollution**

### Elements that should be part of the target

- Reduce pollution from all sources

All pollutants need to be addressed, even if the list is not exhaustive or if new pollutants are identified.

- Levels that are not harmful to biodiversity and ecosystem functions and human health.

All pollutants should respond to overall environmental and health considerations, not only as separate entities, but also in their combined effect, so that they have no harmful effect on the ecosystem.

- Phasing out Highly Hazardous Pesticides

A relatively small number of HHPs cause disproportionate harm to the environment and human health, including severe environmental hazards, high acute and chronic toxicity. Phasing out the use of HHPs is necessary and consistent with developments in other international fora addressing chemicals and pesticides.

- Reducing nutrients lost to the environment

Excessive use of manure and other organic and synthetic fertilisers lead to pollution levels that destroy sensitive plants and animals. This affects water bodies as well as terrestrial ecosystems such as meadows and forests.

➤ Synthetic pesticides

Undeniable evidence exists that synthetic pesticides pose significant risks to the biodiversity and ecosystem services affecting non-target species, ranging from beneficial soil microorganisms, insects, plants, fish, and birds to human with alarming number of deaths and chronic diseases related to pesticide exposure.

➤ Light and noise pollution

Light pollution has a big impact on nocturnal life, and can increase the risk of extinction of numerous insects. Noise pollution affects marine life significantly, but can also interrupt the communication between terrestrial species, undermining e.g. their mate-finding and therefore threatening the species

➤ Inclusion of measurable or quantifiable targets

The current text has quantified reducing nutrients lost to the environment [by at least half], and pesticides [by at least two thirds]. It would be important to keep these quantifications, in addition to the fact that pollutants need to be kept at levels non-detrimental to biodiversity. In this way, progress can be measured in the amounts by which these pollutants are reduced. In relation to plastic waste and the proposal to phase out Highly Hazardous Pesticides, the quantifiable target is elimination to zero.

Further reading on target

- TWN briefing paper on the pesticides component of target 7:  
<https://www.twn.my/title2/biotk/2021/btk210802.htm>
- Villa-Galaviz, E, Smart, SM, Clare, EL, Ward, SE, Memmott, J. Differential effects of fertilisers on pollination and parasitoid interaction networks. *J Anim Ecol.* 2021; 90: 404– 414. <https://doi.org/10.1111/1365-2656.13373>
- Sud, M. (2020), "Managing the biodiversity impacts of fertiliser and pesticide use: Overview and insights from trends and policies across selected OECD countries", OECD Environment Working Papers, No. 155, OECD Publishing, Paris, <https://doi.org/10.1787/63942249-en>.

## Target 8: Climate change

Main element to be addressed in this target:

➤ The impacts of climate change, and its policies and measures on biodiversity

The responsibility of the CBD is biodiversity, and this should be the first focus

➤ Addressing the common drivers of climate change and biodiversity loss

There where drivers are common between biodiversity loss and climate change, the CBD needs to take responsibility for its part in the crisis

Elements that should be part of the target

➤ Minimise the impact of climate change on biodiversity by reducing greenhouse gas emissions from all sources

While the main responsibility for regulating the reduction of GHG is on the UNFCCC, the impacts of climate change on biodiversity are huge.

For some sectors, such as forests, and agriculture, policy measures by the CBD can also significantly contribute to enable emission reductions.

➤ Reduction of the threats to biodiversity from climate change

The objective of the GBF is to reduce the threats to biodiversity – in this target from climate change- by reducing emissions from GHG from all sources, including from deforestation and agriculture and industrial scale animal production.

➤ Reduction of the threats from actions/policies addressing climate change

Examples: geoengineering; large-scale afforestation that replaces forests with tree plantations, bioenergy and bioenergy carbon capture and storage (BECCS) projects,

➤ Prioritisation of climate actions and policies that enhance biodiversity

Examples are approaches for ecosystem restoration and sustainable, resilient, and equitable management practices in agriculture, such as agroecology, agroforestry, and silvo-pastoralism.

➤ Rights of IPLC and in particular women

Many climate measures and policies undermine the rights of IPLCs, while in fact it is IPLCs who are doing most for preserving biodiversity and the climate.

➤ Conservation of rich natural ecosystems

Natural ecosystems are paramount to preserve the climate AND biodiversity. Especially forests, peatlands, savannas and oceans need to receive protection in order to enable a stable planet.

➤ Ecosystem approach

This approach has been defined by decision V/6, which offered a very comprehensive understanding.

Mitigation and adaptation have to be in compliance with the CBD ecosystem approach making all ecosystems governed and managed by communities who live closest to them as locally adapted to live with and by their regeneration. The extent to which carbon stocks are sustained as self-regenerating is crucial, also to avoid repeated plantation funding produced by emitting industrial processes.

### Elements that should NOT be part of the target

➤ Nature Based Solutions

NBS is being promoted and framed in CBD, not oriented to solving the biodiversity crisis, but oriented to the interests of other sectors, as a contribution to climate mitigation and adaptation. Risks bringing in elements that are negative for biodiversity, such as monoculture tree plantations and gene drives.

There are insufficient guarantees that “safeguards” for NBS would work, while there are many indications that interests of business and policy makers will override human rights concerns.

➤ Geoengineering and BECCS

Decision X/33 of the CBD addresses the negative impacts of geoengineering on biodiversity, and states “that no climate-related geo-engineering activities that may affect biodiversity take place, until there is an adequate scientific basis (...)”

BECCS is a specific form of geoengineering, which relies heavily on plantations for biomass, which have negative impacts on biodiversity.

➤ 10GTeq in emission reductions

The target should be worded to reflect actions and objectives for the protection, restoration, enhancement of biodiversity. Carbon is not a metric that can do this.

Carbon storage varies widely across ecosystems and is not correlated with richness of biodiversity. Using a carbon-based target could actually incentivize the destruction of species-rich ecosystems and promotion of projects focused on carbon sequestration, such as monoculture tree plantations and/or BECCS projects.

➤ Carbon offsets

Offsets do not imply a reduction; at best they mean a displacement from one site of emissions to another one. More often, there is double-counting, baseline problems and others which actually imply that carbon offsets do not raise ambition but are a loss for the climate.

The CBD should facilitate biodiversity policies, and should not facilitate carbon offsetting, as this is not its function.

Further reading on target

- FOEI briefing paper on target 8 <https://www.foei.org/wp-content/uploads/2021/10/Target-8-Briefing-note.pdf>
- GFC on NBS: <https://globalforestcoalition.org/faos-plantations/>
- FOEI on NBS: <https://www.foei.org/publication/nature-based-solutions-a-wolf-in-sheeps-clothing/>
- FOEI on BECCS: [https://www.foei.org/wp-content/uploads/2021/01/Friends-of-the-Earth-International\\_BECCS\\_English.pdf](https://www.foei.org/wp-content/uploads/2021/01/Friends-of-the-Earth-International_BECCS_English.pdf)

## Target 9: Benefits

Addressing elements in the right order

- Sustainable management is more important than benefits, and should be at the start of the target

The target currently prioritises benefits to human beings rather than seeing ecosystems as complex wholes with many functions that may not directly benefit humans but whose damage or destruction would undermine the ecosystem's functioning as a whole.

Elements that should be part of the target

- Pollination

Pollination is one of the most important and most vulnerable ecosystem functions both for plant and insect biodiversity as well as for food security globally

- Equitable sharing of benefits

The benefits of nature are not equitably shared and over-use by some will affect the overall availability of benefits for all

- And livelihoods

Livelihoods of millions of peoples, particularly IPLCs, small farmers, fisherfolk and women depend on the benefits of proper ecosystem functioning

- Protect customary sustainable use by indigenous peoples and local communities

Cultural, social, economic and ecological elements associated with the traditional management systems of lands, waters and territories of indigenous and local communities and their involvement in the management of these areas should be recognized, secured and protected, as they contribute to customary sustainable use of biological diversity (Source: CSU Plan of Action of the CBD)

Elements that should NOT be part of the target

- Significantly increase the contribution of sustainable bio-economy

The bio-economy is a concept that has not been defined or agreed within the CBD. In commercial circles it is a concept promoted by the biotechnology industry to describe use of biotechnological products in production processes. It is not the CBD's role to "Increase" a

particular industrial agenda but to ensure biosafety, conservation of biodiversity, equitable sharing of benefits, etc.

## Target 10: Agriculture and forestry

### Elements to be replaced

- “Ecosystem services” by “Ecosystem functions”

Ecosystem functions are well defined under the CBD. The word services is a market term, and suggests that the main function of ecosystems is to serve human requirements.

### Elements that should be part of the target

- Ensure that all areas under agriculture, aquaculture, fisheries, forestry and other productive uses are managed sustainably

These sectors have been identified by IPBES as the ones which most impact biodiversity. These land-uses together have a bigger land occupancy than any other use. So, their sustainability is key for global environmental sustainability.

- Agroecological approaches and indigenous food systems

Agroecology and indigenous food systems have consistently proven capable of sustaining yields over time, while conserving and sustainably using biodiversity, and providing a basis for adequate nutrition and secure farm livelihoods, especially for small producers. Agroecology also provides farmers a means to spread risks during adverse and extreme weather events, adapt to climate change and build climate resilience. Such food systems are also positive for biodiversity and climate.

- Phasing out all unsustainable production forms, such as systems based on monoculture production and on agrochemical and excessive natural fertiliser inputs

Unsustainable agricultural production forms are the main cause of biodiversity loss, according to the IPBES and they also speed up climate change impacts

Particularly monoculture production is linked to loss of biodiversity and agro-biodiversity, and to agrochemicals which are devastating for biodiversity and ecosystems - and also human health

- Reducing nutrients lost to the environment, including by abolishing synthetic fertilisers

Excessive use of manure and other organic and synthetic fertilisers lead to pollution levels that destroy sensitive plants and animals. This affects water bodies as well as terrestrial ecosystems such as meadows and forests. Synthetic fertilisers should be abolished completely.

- Support to farmer seed systems

Seeds are at the basis of agrobiodiversity. It is small scale producers, in particular indigenous peoples and local communities, women, pastoralists and fishers, which ensure the continuity of seed systems. These should be protected, including through in-situ and on-farm conservation, and ensuring their secure land, water and sea tenure.

### Elements that should NOT be part of the target

- Sustainable intensification

Sustainable intensification retains the focus on productivity, technology and capital-intensive production rather than a structural transformation of food systems via ecological, economic, social and political change. Some practices included are: reduce tillage through the use of GM crops or reduce the carbon intensity of industrial livestock. However, many of those techniques have serious impacts on biodiversity themselves.

- Ecological intensification

Unclear terminology which probably leads to the same practices as sustainable intensification

- Increased productivity

In many cases productivity -as managed by agro-industry - is contrary to biodiversity concerns, so including it could lead to further loss of biodiversity.

Productivity is the competence of the FAO, then the CBD has to ensure/check/regulate that those productive methods are compatible with biodiversity conservation.

#### Further reading on target

- On sustainable intensification, in ECO:  
<https://eco2022cbdalliance.blogspot.com/2022/03/sustainable-intensification-green.html>
- On agricultural biodiversity in the CBD, by FOEI:  
<https://www.foei.org/publication/replanting-agricultural-biodiversity-in-the-cbd/>
- On meat production and impact on forests and biodiversity, by GFC:  
<https://globalforestcoalition.org/whats-steak-impacts-industrial-livestock-feedstock-sector-forests-biodiversity-farmers-communities/>

## Target 11: Air quality

#### Elements that should be part of the target

- **Prevent** hazard and extreme events

Rather than just protection against them

- Maintain and enhance nature's contribution, in particular to the regulation...

Nature's contributions can improve many other conditions

#### Elements that should NOT be part of the target

- Nature Based Solutions

The reinsertion of Nature-based solutions (NBS) in this target would be problematic because the contributions mentioned in this target need to be maintained for their own sake and not to offset the destruction of nature elsewhere.

## Target 12: Urban areas

#### Elements that should be part of the target

- Increase **the biodiversity and the area of ...**

Green and blue areas alone in urban spaces is not enough, it should be assured that they are high in biodiversity.

Increase the area of green and blue spaces for healthy well-being in urban and other densely populated areas by opening up built up and sealed spaces and greening them.

## Target 13: Access and Benefit Sharing

#### Elements that should be part of the target

➤ **Free prior and informed consent**

If consent isn't given freely, it is not consent. "Free" is part of the agreement of the ILO169 convention.

➤ **Digital sequence information**

A Goal addressing the 3rd objective of the CBD that does not include DSI will not keep up with the developments in technology that are currently allowing access without benefit sharing.

➤ **Associated traditional knowledge**

The CBD and Nagoya Protocol on Access and Benefit Sharing apply also to traditional knowledge associated with genetic resources within the scope of the CBD and to the benefits arising from the utilisation of such knowledge

➤ **Sharing of benefits in particular with IPLCs**

IPLCs play a key role in the conservation and sustainable use of biodiversity. Benefits that are equitably shared with them is a matter of justice, and will also ensure better stewardship of biodiversity.

➤ **Co-operation on horizon scanning, assessment and monitoring**

Technical and scientific cooperation between parties is required for the horizon scanning, assessment and monitoring of technologies not simply the transfer of the technologies. Transfer without Horizon Scanning, Assessment and monitoring is without appropriate wisdom and safeguards.

Elements that should NOT be part of the target

➤ **Facilitated access**

The objective of the CBD and the Nagoya Protocol is the fair and equitable sharing of benefits arising from the utilisation of genetic resources. It is not about facilitated access.

## **Target 14: Governments**

Elements to be replaced

➤ **Fully integrate biodiversity values into policies with "considerations" or else "issues and commitments"**

Even though the definition of "values" in the CBD recognises all the different values (the intrinsic, ecological, genetic, social economic, scientific, educational, cultural, recreational and aesthetic values), in the implementation and in indicators this has a tendency to be reduced to "economic value". "Considerations" implies biodiversity needs to be duly considered, also when the project that would lead to destruction would be economically more profitable than the economic value of nature. "Issues and commitments" imply any issue that can raise for biodiversity, and any commitment parties have made.

Elements that should be part of the target

➤ **Strong regulation by governments,**

Governments must be the primary actors, because industrial sectors such as mining, industrial agriculture, oil production, etc are so much more powerful than biodiversity advocates and environmental defenders. Governments need to determine environmental rules and ensure it is not advantageous to disregard the needs of biodiversity to be more competitive.

➤ **All new and existing policies**

The integration of all biodiversity issues and commitments into policies, or in short, a "biodiversity check" is both needed for all new policies to avoid negative effects on

biodiversity as well as for all existing policies so they do not continue to have negative effects on biodiversity.

- Comprehensively applied assessments of environmental, social, cultural, gender and human rights impacts

Development projects and other processes which destroy biodiversity and ecosystems are normally also negative for social, cultural, gender and human rights impacts

Ultimately, all policies need to be compatible with the needs for biodiversity and thus of people and the planet, ensuring the goals and targets of the GBF are reached.

- Adopt NBSAPS as overarching and comprehensive policy instruments”

NBSAPs need to be developed as comprehensive policy instruments, including the political weight at ministerial decision-making level. This shall ensure that all policies, regulations, planning, financing assessment, poverty reduction and other state's processes which affect biodiversity will respect all CBD obligations and fulfil them, independent of the governance level or economic sector.

NBSAPs were also part of the Aichi Targets, so not including it would be a regression.

- Strategic environmental and technology assessments

Technologies should be required to undergo horizon scanning, assessment, and monitoring of technologies, in order to avoid negative impacts, regulate to prevent harm and to prioritise conservation of biodiversity.

#### Elements that should NOT be part of the target

- Recognize biodiversity as a strategic asset for the economy

This suggests we need to put an economic value on biodiversity. It reduces biodiversity to only one of its values, and often leads to trading and offsetting, and thereby to more destruction.

- “Sustainable” deep sea mining

Deep sea mining presents an unacceptable risk to ecosystems that are little understood, highly biodiverse, fragile, and slow to recover from the impacts of activities such as mining. No such mining can ever be sustainable, and it should be prohibited altogether.

## **Target 15: Business**

#### What the scope of the target should be

- Ensuring liability, legal responsibility and accountability of business

Hold business and the finance industry legally accountable for any negative impacts on biodiversity and human rights and apply the polluter pays principle.

- Installing a governmental regulatory framework

Such framework should ensure all business and economic activities are sustainable and are in line with the needs of biodiversity.

#### Addressing elements in the right order

- The first and key element in this target must be government responsibility

Businesses do not have the obligation to change their behaviour because the CBD says so. They do if governments regulate them. And the role of the CBD is to ensure governments cooperate on this

#### Elements to be replaced:

- “Reducing biodiversity-related risks to businesses and financial institutions” by “reducing business-related risks to biodiversity”

The risks businesses have, should not be the concern of the CBD, but the risks of undermining biodiversity are at the core of the work of the CBD

- “Eliminate” instead of “reduce” negative impacts

The earth has already surpassed planetary boundaries, also in particular related to biodiversity. We need to return to living within the planetary boundaries. This requires stopping the impacts rather than merely reducing them. If negative impacts continue to happen -even if to a lesser degree- the situation keeps worsening.

- “accept responsibility for their actions” by “be held responsible for their actions”

The difference is that in “accept responsibility” corporations can choose themselves how they fill in this responsibility, and how lightly they go over problems, whereas “being held responsible” implies a policy framework that defines the implications of responsibilities and liability.

### Elements that should be part of the target

- Operate within planetary boundaries

Planetary boundaries are already being breached with serious and inequitable impacts and this must be the basis for planning all business activity.

- Legal, administrative and policy measures

The target needs to be based on all types of implementable regulatory measures, issued by governments at all levels

- penalties for infractions and liability and redress

Environmental regulation for business needs to be binding, and needs to be implemented. This includes penalisation for infractions of environmental regulation, both nationally and transboundary for those businesses which work at transboundary level.

Also, green labelling for products which do have negative environmental and social impacts needs to be penalised

- address conflicts of interest

Businesses which have an economic interest in the outcome of regulations or environmental decision making should not have a say in these regulations or decisions. Clear conflict of interest policies need to be established. This applies for local, national and UN decision spaces.

- Monitor and regulate all processes and activities of business

States have to identify and monitor all processes and activities of business and financing which have adverse impacts on world's biodiversity

- Especially large and economically significant businesses

Large businesses work internationally. International coordination of regulation is needed because of their size and transboundary characteristics.

Large businesses also have significantly more impact than small ones, and have a bigger capacity to implement measures than small ones.

- Those with significant impacts on biodiversity

Industrial agriculture, mining, forestry are major causes of biodiversity loss and thus require particularly strong regulation.

- Ensure full transparency of business' activities and their impacts

Governments must follow up on business' activities and their impacts and citizens have the right to have verifiable information

➤ Respect human rights

Most environmental defenders whose rights are being violated, were standing up against corporate projects, in defence of nature. Defence of the life and rights of environmental defenders is intrinsically important, and their plight is important for ecosystem conservation.

➤ Telecoupling

comprehensive analysis of both the socioeconomic and environmental impacts of distant, coupled human and natural system's interactions. This is a concept explained and demonstrated in the IPBES global assessment report.

➤ Cross-border responsibility regarding environmental impact

According to paragraphs 3 and 4b of the Convention, countries need to take responsibility to stop damage to biodiversity in other countries, including through their production and consumption, and thus through regulating their businesses. Any overstep of the fair and equitable footprint of countries does involve such damage to other countries. This obligation is particularly important in relation to supply chains and telecoupling.

From CBD articles 3, 4b, 7c, 8 1, 14.1d & 22.1, it follows that developed country CBD parties with many transnational corporations under their jurisdiction are obliged both to control them to prevent adverse impacts and also to provide resources for the developing countries to regulate such TNCs ( CBD articles 8m, 11, 14 and 20)

Elements that should NOT be part of the target

➤ Business self-responsibility and self-reporting

Self-regulating and self-reporting have in the past not proven to be effective measures to improve environmental protection or human rights compliance. Even if governments “regulate that business needs to self-regulate” this doesn't change the underlying problem of self-regulation. They also involve a direct conflict of interest

➤ Subordinating implementation to WTO or other trade agreements

Other agreements such as WTO cannot be cited to avoid obligations to protect biodiversity within states and in areas beyond national jurisdiction. Else the environment will forever be subordinated to economic interests.

➤ Sustainability of extraction

To become sustainable, extraction and production need to be reduced without delay to end the breaching of planetary boundaries.

Business must verifiably, publicly and independently prove that its extraction and production processes are not causing biodiversity destruction.

➤ **Encourage** business and financial institutions

Measures which just “encourage” will not be sufficient in scope and impact to revert the significant impact of business on the environment. A much deeper change is needed.

➤ Biodiversity-positive practice

Biodiversity-positive is not a well-defined term, but it seems to imply the adding up of negative impacts and supposed positive ones. More often than not, this is greenwashing.

## Target 16: People

Scope of the target

This target should be oriented towards governmental regulatory frameworks so actions, activities, consumerism and corporations that destroy biodiversity through promoting unregulated consumption choices are reduced to be within planetary boundaries.

This includes incentives and price policies  
Ensuring use of resources for consumption is sustainable and equitable

#### What the scope should NOT be

The current scope of the target seeks to transfer the responsibility for making ‘responsible choices’ to people. This is unacceptable, as people do not have access to the information, the resources nor do they have the power to make the necessary changes.

#### Elements that should be part of the target

- Policies regarding consumption products

Governments have to take responsibility to make sure that consumers don't buy hugely damaging products, and that information on products is real.

- Prices that reflect the effect on biodiversity

There should be higher prices for products which are more harmful to the environment. Conscious consumption can't be a prerogative of the (higher) middle classes. Taxes and subsidies should get the balance right, and ensure environmentally friendly and healthy food is accessible and affordable for all.

- Identify and monitor all processes and activities of waste and consumption

States have to identify and monitor all processes and activities of waste and consumption, which have adverse impacts on the world's biodiversity and regulate and manage them all, so that their adverse impacts on biodiversity are prevented. The CBD has to ensure this happens, and coordinate the effort by states.

- In accordance with fairness and equity, taking into account historical patterns of production and consumption

The responsibility for taking action has to first lie with those who are most responsible for unsustainable production and consumption.

#### Elements that should NOT be part of the target

- “Where relevant” when talking about overconsumption

Wherever overconsumption happens, it is relevant and needs to stop. In a world with limited resources, overconsumption by some population groups imply both an overly big impact on the planet, and an unfair reduction of resources for other population groups.

- Cultural preferences

Cultural preferences can be important, but a country with a huge impact on biodiversity through its consumption needs to change this, and can't call upon “culture” to avoid acting. If included, it should have a clear indication of this element.

## **Target 17: Biotechnology**

#### Elements that should be part of the target

- Precautionary Principle to address adverse impacts

Identify, prevent, and control actual and potential adverse impacts of biotechnology on biodiversity, applying the precautionary principle.

- Modern biotechnology and synthetic biology

Synthetic biology and other new genetic techniques fall within the scope of modern biotechnology. During the timeframe of the GBF, synthetic biology and other new genetic techniques will be increasingly used, hence their risks should also be adequately addressed.

Some parties have threatened to derail decision-making on Synthetic biology under CBD if not specifically mentioned by GBF.

➤ Parts and products (from biotechnology)

Living Modified Organisms (LMOs) are too limited in scope, and decisions under the CBD regarding biotechnology, such as synthetic biology, go beyond LMOs and also address the organisms, components and products of synthetic biology. This is important because the LMO isn't the only point of impact; synthetic DNA/RNA, for example, can have direct impacts on the conservation of biodiversity in severe ways. Thus, the CBD should continue to discuss the “parts, organisms and products of synthetic biology,” as a package term, rather than just LMOs.

➤ Horizon scanning, monitoring and assessment

Horizon scanning, monitoring and assessment are relevant to modern biotechnology, including synthetic biology and other new genetic techniques, and would allow for the rapid and fast-paced developments in the field to be reviewed, and their potential adverse effects anticipated, monitored and assessed.

➤ The need for regulation

Article 8(g) of the CBD obliges Parties to establish or maintain means to regulate the risks associated with living modified organisms (LMOs) resulting from biotechnology. The Cartagena Protocol on Biosafety is the legally-binding instrument that implements Article 8(g) and Parties have to take necessary and appropriate legal, administrative and other measures to implement their obligations.

Article 14, Impact Assessment and minimising adverse impacts, is important for the whole GBF and particularly target 17.

➤ Socio-economic considerations

Article 26 of the Cartagena Protocol establishes the right of Parties to take into account socio-economic considerations, especially with regard to the value of biodiversity to indigenous peoples and local communities (IPLCs). The roots of this article are in the CBD's Article 8(j), which sets out obligations with respect to the “knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles”.

➤ Liability and redress

Article 14 of the CBD obliges Parties to examine the issue of liability and redress for damage to biodiversity.

➤ Free, prior and informed consent

The principle of free, prior and informed consent (FPIC) for IPLCs is established and implemented not only by the CBD, but also international human rights standards such as the UN Declaration on the Rights of Indigenous Peoples. CBD COP Decision 14/19 in particular calls for FPIC (or the equivalent at national level) of potentially affected IPLCs to be sought or obtained in relation to the environmental release of all new technologies and consent for their use must be discussed and obtained at global level of gene drive organisms.

➤ In accordance with fairness and equity, taking into account historical patterns of production and consumption

The responsibility for taking action has to first lie with those who are most responsible for unsustainable production and consumption.

Elements that should NOT be part of the target

➤ Innovation principle

This term is applied to new technologies (synthetic biology, geoengineering) proposed to address problems caused by the economic model of endless growth instead of directly addressing the consequences of that model.

- Benefits of biotechnology

The use of the word benefits is manipulative and experience to date with GM crops shows that the impacts on biodiversity and human health where they are grown are negative

- Restriction of this target to Cartagena parties  
The GBF needs to be applicable to all CBD parties.

## Target 18: Perverse Incentives

### Elements to be replaced

- 500 billion USD by 1 trillion USD per year of additional reduction, reaching the overall reduction of at least 4-6 trillion USD per year.

The Dasgupta review shows 4-6- trillion USD is a more probable estimate amount of perverse incentives, though it is probably still an underestimate

Incentives need to be reduced by 1 trillion USD per year annually because: a) not all have been identified, and 4-6 trillion is an underestimate and b) there is an urgency to address this problem. The objective should be to eliminate incentives that damage biodiversity both directly and indirectly by 2030.

### Elements that should be part of the target

- Eliminate, phase out or reform or repurpose all perverse incentives as soon as possible.

Perverse incentives support measures that undermine biodiversity, human rights, and the finance given for biodiversity. They have the potential to undermine all other biodiversity policies. The failure to comply with Aichi Target 3 thus played a key role in the overall failure to implement the Strategic Plan 2010-2020 of the CBD. It is of utmost importance there is no regression from Aichi Target 3.

There should be no exceptions, ALL incentives harmful to biodiversity need to be identified and eliminated or repurposed by 2030.

- Identify perverse incentives and analyse what drives them

Not all perverse incentives have been identified yet, there is a clear need for a systematic in-depth process of identifying and analysing different types of perverse incentives, including potential novel perverse incentives. They need to be continuously evaluated. Such a process should also include a profound analysis of the institutional arrangements and structures that might drive the creation of perverse incentives

- In a just and equitable way

The elimination, phasing out and reforming of perverse incentives should be part of a broader process of just transition, including through ensuring that subsidies, to the extent that they benefit marginalised communities, are reformed and coupled with alternatives so as to not disproportionately impact those communities.

- Redirection of financial savings of reforms and channelling to IPLCs and other vulnerable groups

When financial savings are generated from subsidy reform, the resources should be used for activities that support biodiversity. Savings which are not repurposed for the same groups should be equitably redistributed, especially to the Indigenous Peoples, local communities and women which are conserving and sustainably using biodiversity.

### Elements that should NOT be part of the target

- Payments for environmental services

Payments for environmental services lead to the commodification and financialization of biodiversity, undermine cultural value systems that support biodiversity conservation and reinforce the disadvantageous economic position of politically and economically marginalised groups like women, Indigenous Peoples and small farmers, who often have insecure or otherwise non-recognized land governance rights.

- In a manner consistent with WTO rules

It is not acceptable to make a decision in the CBD subordinate to the WTO which may be a key reason for biodiversity loss. The WTO may, in fact, need to adapt to align with the CBD and the GBF

- In harmony ...with other relevant international obligations

This is ambiguous and could make CBD subordinate to other international agreements, unless they are harmonious to and aligned with CBD objectives

- Redirect and repurpose to nature-positive activities

'Nature-positive activities' is not defined language in the CBD and could be used to allow offsets.

#### Further reading on target

- Analysis and proposals for Targets 18 and 19 of the First Draft of the post-2020 Global Biodiversity Framework, Third World Network  
[https://www.twn.my/announcement/Target%2018%2019%20GBF\\_TW%20Briefing%20Note.pdf](https://www.twn.my/announcement/Target%2018%2019%20GBF_TW%20Briefing%20Note.pdf)
- Incentivising deforestation for livestock products, Global Forest Coalition,  
<https://globalforestcoalition.org/perverse-incentives-deforestation-for-livestock/>
- Circular economy or vicious cycle? How corporate capture of policy-making and perverse incentives are driving deforestation, Global Forest Coalition,  
<https://globalforestcoalition.org/forest-cover-63/>

## Target 19.1: Financial resources

#### Scope of the target

- The level of finance needs to be commensurate with the needs for implementation of the GBF and be achieved by 2025, as the money still needs time to produce results

Finance provided should be in relation to what is needed for the planet, not in function of what governments feel they can spare. It must be supplied early enough so there is time enough to produce the desired effects.

- Implementing common but differentiated responsibilities, and article 20 of the Convention

The obligation for developed country Parties to provide new and additional financial resources to enable developing country Parties to implement the CBD, has not been met. Equity is the key to unlocking implementation and must be included.

#### Elements that should be part of the target

- Multilateral tax reform and addressing sovereign debts

Tax reform and debt justice would more permanently counter the debt-austerity nexus that limits developing countries in particular from reaching their biodiversity targets, while beginning to right the historic imbalance between those who have economically benefited the most from biodiversity decline and those who have not.

- Ensuring that sufficient funds are channelled to support biodiversity stewardship by IPLCs, smallholder producers and women

Sufficient finance needs to be provided for IPLCs smallholder producers and women, as they have been identified as the real guardians of nature (80% of currently existing nature is being preserved by them). Yet, often they lack the resources to do so, or they are coerced into signing contracts with damaging industries, because of poverty.

- Public financial resources

It needs to be governments who are responsible for providing this money. Private finance has so far only been provided as an exchange for leniency in regulation, access to resources, or for greenwashing. The implementation of the GBF would be undermined by these.

#### Elements that should NOT be part of the target

- Private finance

There may be interests or obligations connected with private finance that are in contradiction to the need to conserve biodiversity, thereby creating a conflict of interest.

Private finance will only be provided if there is profit to be made from it, or reputation to be gained. This leads to finance that is oriented towards offsetting and greenwashing.

Finance for offsetting cannot be counted as finance for biodiversity, as this finance is only meant to compensate for other destruction.

- Innovative financial resources

Many innovative finance instruments are related to commodification of Nature, with all its negative consequences

- Blended finance/ leveraging private finance

The use of public funds to de-risk private capital investment is problematic. Large amounts of public capital will be needed to leverage the desired private capital. There is no guarantee that more private capital will lead to biodiversity outcomes and sustainability. Instead, there is a risk of private gains and social losses, as blended finance guarantees the incomes of investors and investment bankers, rather than peoples and nature.

- Only appropriate, socially acceptable and environmentally sound technology and innovation is promoted, accessed or transferred

Any technology or innovation that is transferred should be subject to technology horizon scanning, monitoring, and assessment, and must be appropriate, socially acceptable and does not cause significant damage to the environment, in accordance with Article 16.1 of the CBD.

#### Further reading on target:

- J.Dempsey et al Biodiversity targets will not be met without debt and tax justice, Nature, December 2021 <https://www.nature.com/articles/s41559-021-01619-5>

## **Target 19.2: Other resources**

#### Elements that should be part of the target

- Technology horizon scanning, monitoring, and assessment

Broadly scoped research into future technologies that are still on the horizon and the assessment and ongoing monitoring of technologies that are in development are essential to ensuring that their potential risks for biodiversity are addressed and that existing

technologies, practices and knowledge systems are explored as potential alternatives that are more able to conserve biodiversity.

#### Elements that should NOT be part of the target

➤ Innovation

This word can signal a desire to avoid tackling the real issues of biodiversity loss by promoting a ‘technical fix’ for a problem

- Access to and transfer of technology, and promote development and access to innovation  
Such language could open the way to the imposition of untried innovations and technologies that could further damage biodiversity

## Target 20 (Awareness)

## Target 21: Participation & rights holders

#### Scope of the target

- Respect for human rights and IPLCs rights, including land and resource rights, particularly of women

IPLCs have conserved 80% of existing biodiversity, but they only are able to do so where their rights are well respected.

Environmental defenders get killed – or their basic rights otherwise violated- while they are working to conserve the environment. Respect for their rights is vital for ensuring the environment doesn't get undermined.

- Broad participation in full, equitable and effective participation in decision-making related to biodiversity, by IPLCs, women, girls, youth and all other civil society groups.

Without proper participation, there is no ownership, and plans do not get followed up. Participation is an essential component of good governance, as it helps to improve plans, to gather additional facts and perspectives, and to raise attention to challenges that need to be overcome.

Note that participation needs to be well defined, ensuring it to mean real involvement of rightsholders groups, and avoiding consultations of types which are so specialised that the people can't give input.

#### Addressing elements in the right order

- Make this the first target.

Because this issue is cross-cutting and a prerequisite for all the other targets

- Separate respect for Human Rights and participation, and bring human rights in the first place

Respect for human rights is a prerequisite for all other participatory measures.

#### Elements that should be part of the target

- **Free, Prior and Informed Consent**

The principle of free, prior and informed consent (FPIC) for IPLCs is established by international human rights standards such as the UN Declaration on the Rights of Indigenous Peoples.

➤ Access to information

All civil society groups and concerned citizens have the full right to be aware of the state of the environment, and the threats and risks to it from any given industry or development project.

➤ Access to justice

Rights and participation become meaningless if they are not being upheld by justice systems

Further reading on target

- The essential rights for community forest management, Friends of the Earth International, <https://www.foei.org/publication/essential-rights-community-forest-management/>

## **New target: Gender**

Scope of the target

It is of utmost importance from a perspective of human rights that the post-2020 Global Biodiversity Framework is gender just and gender transformative.

Parties to the CBD have also agreed that the GBF will be gender transformative, and the commitment is reiterated in the draft Gender Action Plan that will be part of the GBF. Only such a specific target will ensure the generation of specific policy support and institutional capacity to ensure the GBF is built on the rights, role, needs and aspirations of women in all their diversity.

## **New target: impact of actions on biodiversity in other countries**

Scope of the target

- Ensure that Parties' activities do not cause damage to the environment of other Parties or areas beyond national jurisdiction

Articles 3 and 4b of the Convention set this obligation out clearly and include both other countries and areas beyond national jurisdiction (ABNJ).

CBD articles 3 and 4 (b) can be fully understood as CBD obligations in this respect in their connection to the CBD articles 7c, 8 (l) and to the articles 6 (f), 8 (i), 8 (j), 8 (m), 14.1 (d) & 22.1, etc

Moreover, we cannot address biodiversity loss and our multiple crises while we continue to damage the environment of other Parties and Areas Beyond National Jurisdiction. We need to address these crises collectively according to the principle of CBDR.

Elements that should be part of the target

- Consumption and international trade and investment

These are major drivers of biodiversity loss and must be tackled at national and international level, in a just and equitable way

- Countries' ecological footprints not to exceed their fair share of global biocapacity,

Currently the difference in ecological footprint between countries and between global north and global south is huge. It needs to be thoroughly and verifiably documented so that this information can be used to identify and sanction countries with high ecological footprints.

Current gross inequalities in ecological footprints plus the inequitable geographic distribution of negative impacts have to be addressed urgently in order to address biodiversity loss

➤ Avoid negative telecoupling

According to paragraphs 3 and 4 of the Convention, countries need to take responsibility to stop damage to biodiversity in other countries, including through their production and consumption.

Telecoupling: comprehensive analysis of both the socioeconomic and environmental impacts of distant, coupled human and natural system's interactions. This is a concept explained and demonstrated in the IPBES global assessment report.