



Open letter to the participants in the Open-ended Working Group on the Post-2020 Global Biodiversity Framework

Subject: Concerns about the process and outcomes of the Informal Group on the Post-2020 Global Biodiversity Framework.

Dear Madam, Sir,

Following up on our earlier letter expressing concern about the procedure by which the Informal Group on the post-2020 Global Biodiversity Framework was established, we wish to make a number of points:

1. The outcomes of the Informal Group must not be used as the basis of the negotiations going forward. For example, we note that substantive positions have been eliminated, which Parties have the right to reintroduce. This is important because the CBD has not provided any specific mandate for such Informal Groups to determine how the Convention shall be applied.
2. Furthermore, participants in the Informal Group were selected in a non-transparent manner, and neither representatives of Indigenous Peoples and other rightsholder groups like women, local communities, and youth, nor NGOs, were invited to participate fully and effectively in the deliberations of the Informal Group.
3. We feel the resulting recommendations, especially as they concern human rights, represent a significant regression in comparison to the many positive proposals put forward during the lengthy negotiations on the GBF so far.

We also strongly object to the suggestion to concentrate all references to the rights of Indigenous peoples, women and local communities in biodiversity conservation in a weak, non-binding section currently called “fundamental premises” (section B bis). As they are not linked to indicators, such premises will fall outside of the monitoring framework and thus it is unlikely they will be properly implemented. In addition, we strongly believe that the implementation and accountability section must remain segregated from/outside/ Bbis.

Under the CBD Parties are obliged to monitor and regulate all processes and activities identified as having “significant adverse impacts” on biodiversity to prevent such impacts globally. As activities of the business and the impacts of over-consumption have been clearly identified as accelerating global biodiversity loss, the recommendations of the Informal Group do not comply with these CBD obligations. Instead, the recommendation of the Informal Group leaves it to corporations to report on their activities and regulate themselves.

At the bare minimum, international standards for biodiversity reporting should be set up through the CBD so that governments could control, monitor, and review this voluntary reporting in a systematic and coherent manner, in order to avoid biodiversity greenwashing.

In these regards, we call on Parties to ensure that these fundamental premises’ are appropriately embedded in the GBF Goals and Targets, to ensure their implementation. There is an urgent need for a paradigm shift in biodiversity conservation policy. In light of the profundity of the biodiversity crisis we are currently facing, we need a genuinely rights-based, gender-just, equitable, and transformative Global Biodiversity Framework that also addresses the root causes of biodiversity loss. We thus urge you to have the courage to go beyond weak compromises and insist on the transformative GBF we truly need.

In a separate briefing paper, we will share with you what we consider the essential ingredients for a truly transformative GBF.

Sincerely yours,

Bharath Reddy

On behalf of the CBD Alliance