



The ingredients for a successful GBF

**UPDATED VERSION
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**The elements that should form part of the GBF
those that shouldn't**

And the reasons why

With special thanks to:



EcoNexus



Mission

Elements that should be part of the target

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

Halting biodiversity loss is paramount, not just slowing down its rate. It must be given precedence over restoration and recovery because extinct species 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 necessary in order 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.

- In fair and equitable, and gender-just ways

Ensure that measures are taken to halt biodiversity loss and to ensure its recovery respect human rights, including women’s rights and provide benefits for all, especially those whose livelihoods most depend on biodiversity.

Elements that should NOT be part of the mission

- Net Gain/No Net Loss/ Nature positive

These concepts are not defined in the Convention text. They are based upon the assumption that biodiversity loss in one area can be compensated by restoration or even conservation of other areas, which has no scientific basis and has proved to lead to further biodiversity decline. It also denies the rights and livelihood dependency of Indigenous Peoples and local communities on the ecosystems they live in and near, which cannot be compensated for by restoration or conservation of other sites.

Elements to be replaced

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

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

Further reading:

- “Net gain is a lose-lose option for rights, gender justice and social equity in biodiversity policy”, Global Forest Coalition, 2022, <https://globalforestcoalition.org/biodiversity-offsets/>

Goal A

Elements that should be part of the goal

- Halt the loss of species & increase their restoration

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

- All natural and semi-natural habitats

The condition of natural habitats is essential for biodiversity. Natural habitats in most parts of the world continue to decline in extent and integrity. Some of them, such as forests and wetlands, have deteriorated most in the last decades and should be particularly highlighted in the goal; it should include all natural habitats, and their further loss must be halted and subsequently brought to zero.

- 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; they need to be preserved in the same way as entirely natural habitats.

- Area

In addition to their integrity, connectivity and resilience, the actual extent/area of ecosystems such as rainforests is an important goal to be achieved.

- Increase areas of ecosystems and species abundance by 20%

In line with target 2, a 20% increase in habitats seems ambitious but necessary.

- Genetic diversity

Genetic diversity must be fully maintained and enhanced *in situ* where possible in all managed ecosystems.

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 practice facilitates the destruction of biodiversity; such compensatory schemes have proven to allow for more biodiversity destruction. They often result in gendered, negative social and environmental impacts. It also denies the importance of local biodiversity for community livelihoods, particularly for women and Indigenous Peoples.

Elements to be replaced

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

To halt biodiversity loss and thus ensure coherence with the previous mission and SDG 15.5., all extinctions (100%) must be stopped. A mere reduction of the extinction rate is not sufficient.

Goal B

Elements to be replaced

- “Ecosystem services” by “Ecosystem functions”

The CBD defined ecosystem functions clearly, while the word “services” is a market term that suggests that ecosystems are only there to serve human (economic) requirements - and an economic system that is growth-driven and, as depicted by IPBES, one of the primary root drivers of biodiversity loss. Thus this reference needs to be replaced.

- “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 the commodification of nature. The aim should be to monitor the implementation of the GBF consistently.

Elements that should be part of the goal

- The right to a clean, healthy and sustainable environment

The resolution was passed at the UN General Assembly on July 28 and is vital for the enjoyment of all human rights and for achieving rapid, inclusive, equitable and ambitious progress in the protection, conservation and sustainable use of biodiversity

- Equitable and gender-just conservation and sustainable use

A significant cause of biodiversity destruction arises from the profound inequity between regions and within countries. It is vital to tackle this issue according to CBD, taking into account historical production and consumption patterns and gender-differentiated forms of sustainable use.

- Sustainably and equitably governed and managed ecosystems

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

- Wide range of biodiversity values

IPBES indicated the importance of multiple perspectives and understandings of nature, including those of Indigenous Peoples and local communities who use and embody concepts like Mother Earth to leverage transformative change. However, policy-makers have mainly focused on the economic and market value of biodiversity while ignoring the other values of nature. Indicators on these multiple values must not focus only on economic issues.

- Fair and equitable reduction of the ecological footprint to operate within planetary boundaries

For the overall use of biodiversity to be truly sustainable, it must be within planetary boundaries. To get to this point, the ecological footprint needs to be reduced to a level that does not exceed the Earth's biocapacity. This is a priority, especially in countries where overconsumption prevails, while LDCs still need to have room for development, in line with Agenda 2030

Elements that should NOT be part of the goal

- Nature-Based Solutions (NBS)

The term nature-based solutions is used in many different contexts, many of which are counterproductive for the environment. In particular, offsetting and greenwashing NBS-projects by corporations can undermine real biodiversity benefits. Most NBS projects are heavily climate oriented, often to the peril of biodiversity, and UNEA has asked for an analysis of their long-term effect on the climate first.

- "Value"

The word value is usually interpreted by decision-makers by focusing on its economic and monetary aspects. As the IPBES values assessment showed, this approach could lead to the overexploitation of nature through processes of commodification and financialisation of nature in a system driven mainly by economic growth values. Instead, multiple, non-monetary values should be taken into account.

Goal C

Main elements central to the goal

Fairly and equitably sharing benefits in sustainable ways, particularly with IPLCs - prioritising how human rights to food, health, livelihood and a clean environment can be implemented equally for all by a 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 reflect the developments in technology that currently allow access without benefit sharing.

- Associated traditional knowledge

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

- Fair and equitable sharing of benefits, in particular with IPLCs

IPLCs play a crucial role in the conservation and sustainable use of biodiversity. Equitably sharing benefits with them is a matter of justice and will also ensure better biodiversity stewardship.

Elements that should NOT be part of the goal

- 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 must be prioritised

Human rights are negatively affected by the degradation of biodiversity and overexploitation. "Environmental harm can have disastrous and sometimes geographically dispersed consequences for the quality of life of indigenous peoples, local communities, peasants, small-scale fisherfolk 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 marginalisation". (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 gap in financing implies a year with a lack of resources for biodiversity.

- Common But Differentiated Responsibilities (CBDR), in accordance with Article 20 of the Convention.

This obligation for developed Parties to provide new and additional public 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, and public. The focus on ‘all sources’ dilutes the obligation of 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, which leads to corporate capture of biodiversity policy-making. There should not be double counting of the financial resources provided, e.g. climate funds being classified as biodiversity funds as well.

- 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.

- Regarding the means of implementation, any technology transfer needs to be accompanied by a technology assessment.

It must be ensured that the transferred technologies are appropriate, sustainable and do not pose risks.

- Direct access of Indigenous Peoples, local communities, women and other rightsholder groups to sufficient financial resources to sustain their conservation initiatives.

Financial resources should reach local and indigenous peoples’ organisations and territories so that the distribution of resources available for biodiversity conservation can motivate and strengthen the capacities of rights holders. This should be done in ways which do not result in offsetting.

Elements that should NOT be part of the goal

- Private sector

Private sector finance implies benefits for those businesses involved, or they would not invest. Thus, this finance often has a conflict of interest. A lot of private sector finance is primarily oriented toward offsetting and should be rejected. Offsetting is just replacing one area with another, so payments for offsetting cannot be accounted for as biodiversity finance. Furthermore, private sector finance is unpredictable, short term and has a limited scope.

New Proposed Goal E: Effective Implementation

In addition to a decision on an improved implementation framework, as outlined in Section J, 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 implementation mechanism must ensure the full implementation of the Convention with all

its obligations, including enabling all means for implementation. This includes the implementation of the GBF itself, which must be an expression of all the obligations of the CBD.

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. Any use of NBSAP, national reporting or other means of CBD implementation has to take into account all obligations of the CBD and fully comply with them, including any of those not dealt with in the GBF. Two years are needed to ensure sufficient time for fully participatory processes.

- A country-by-country peer review mechanism that enables discussion and sparks targeted additional action.

The main tool is a standardised country-by-country peer review mechanism under the open-ended forum. It must include a data collection and report phase, one in which the results will be discussed with peers (scientists, NGOs and other CBD Parties) and a ratcheting-up phase which decides upon additional measures to ensure implementation of the targets.

- Addressing compliance

The Convention should have a compliance mechanism that makes it possible for Parties and civil society organisations to trigger actions in response to non-compliance with the Convention and hold parties accountable in an equitable manner and based on the 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 sanctions.

CITES, the Aarhus Convention and the Bern Convention have proven that such mechanisms can work well and help to 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 be differentiated in an equitable and gender-just manner and based on the national challenges encountered.

Elements that should not be part of the goal

- NBSAPs should not rely on the commitments of business actors.

Any self-reporting by businesses about their activities should be independently verified and not form part of official reporting (National reports), as it is the Parties that are responsible for implementing the CBD.

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

Further reading on goal

- CBDA submission at the 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 currently, it is not being implemented in a biodiversity-supportive equitable and participative way across the globe. Instead of being used as a tool for environmental integrity, there is a danger that spatial planning could be used to identify areas for development and contribute to implementing offsetting. There are other, more suitable planning tools as well.

Elements that should be part of the target

- Ecosystems

This target is about retaining the integrity and area of all ecosystems and the means to do this, following on from Aichi target 5 and in line with Goal A.

- Land use change & Land use intensification

The target should identify “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 vital element.

- Protection of primary forests and other primary ecosystems

This is consistent with decisions 14/5 and 14/30 and the findings of the IPCC’s 6th Assessment Report - Working Group III.

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

- Primary forests and other primary ecosystems

Primary forests are critical. WGIII in the IPCC's AR6 identified the need to retain "carbon-rich primary peatlands, coastal wetlands, grasslands and forests and other ecosystems". IPLC and community conservation is the fundamental way to protect such ecosystems.

- Biodiversity-supportive planning

It is important not only to include biodiversity in the planning process analysis but also to ensure that the plans **support** biodiversity, i.e. by defining no-go areas for for-profit activities and priority areas for biodiversity.

- Equitable Governance based participatory planning

Planning and Governance only work if rightsholders, including Indigenous Peoples, local communities and women, have ownership and governance rights over their territories and are widely supported. This will only be the case if land rights are fully respected and those living in the area can participate in the planning process.

- Prioritising indigenous and other customary tenure rights.

Prioritising indigenous and other customary tenure rights provides a much more robust tool for conserving biodiversity than traditional protected areas.

- Full respect for Human Rights

People primarily need biodiversity to sustain the realisation of human rights to food, health, water, shelter, livelihood and a clean, healthy & sustainable environment. Biodiversity must not be misused for processes that do not benefit humanity. Such biodiversity must not be wasted for other priorities. This means that human use of biodiversity must primarily sustain and fulfil human rights equally for all, taking into account gender differences.

Elements to be replaced

- “Biodiversity inclusive” by “biodiversity supportive”

Biodiversity-supportive means that processes and activities that do not protect or sustainably use 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 essential, though the target should be worded so that restoration cannot be abused as an excuse for biodiversity destruction in other areas. Nor can monoculture tree plantations be counted as restoration.

- Definition of “degraded ecosystem” in the glossary.

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

- Enable and support restoration initiatives by indigenous peoples, local communities, youth and women.

IPLCs have traditional knowledge on improving the ecosystems they live in and governance and tenure rights related to those areas that should be respected.

- With the full and effective participation of IPLCs

Some “degraded” ecosystems are effectively part of a more extensive territory governed or managed by IPLCs, and their use of this area enables the proper conservation of other areas. Changing such designations would require adequate participation.

- Enhance biocultural ecosystems managed by IPLC

This highlights the holistic view of IPLCs, for whom culture is part of nature and vice versa, which makes their actions to protect, restore and sustainably use more resilient and effective.

Elements that should NOT be part of the target

- Mentioning restoration in a way that includes destruction & offsetting

Restoration in itself is critical, but its benefits are undone when it is a compensation for destruction elsewhere.

Target 3: Conserved areas

Main elements to be addressed in this target:

- Purpose and total area

The purpose of conserved areas is to maintain species and habitats in good conservation status. A sufficient total amount of area-based conservation measures are required to ensure adequate protection for all threatened species and ecosystems and to remain within planetary boundaries. At the same time there should 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 governed and managed in an equitable, gender-just and effective manner that fully respects all human rights, thereby fulfilling site-specific conservation objectives. Unfortunately, too many conserved areas are neither equitably nor effectively managed and therefore are no more than paper parks. Moreover, many Indigenous Peoples’ and local communities’ lands, waters and territories are overlapped by protected areas, which are too often organised in ways that disrespect their governance and tenure rights.

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

Given the critical role of areas governed by IPLCs in conserving biodiversity (cf. [IPBES global assessment report](#)), ICCAs and traditional territories need to have priority over classical protected areas. The target should also recognise the contributions of other community-based conservation measures, wherever applicable.

- Full respect for human rights and UNDRIP, including FPIC

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

Elements that should NOT be part of the target

- Any reference to, or possibility of, 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, and other rightsholders. The definition of conserved areas must include Indigenous territories and local communities’ lands, ensuring that designation and governance are inclusive, gender-just and participatory 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 themselves to be the best guardians of nature, wherever this is applicable. However, their rights have often been violated in the name of nature conservation. Therefore, all future area-based conservation needs to take their rights into account.

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

Governance by IPLCs is essential as this is the main way in which they can ensure conservation. Furthermore, this is the only fair and equitable way. To govern their areas effectively, their traditional governance structures and territories need to be adequately recognised. In some cases, shared governance between IPLCs and governments is the best solution, particularly for marine.

- Participatory, equitable and gender-just governance, as well as effective management

Protected areas only deliver when developed and governed participatively, equitably, and in a gender-just way.

- Ecological representativity

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

- Ecological connectivity

By definition, the isolated “islands” of conserved areas surrounded by degraded areas or areas undergoing potentially biodiversity-destructive activities 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 30x30’, 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
- Global report of the Community Conservation Resilience Initiative, Global Forest Coalition, 2018, <https://globalforestcoalition.org/ccri-global-report/>

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 is not defined.

Elements that should be part of the target

- In situ

Conservation in the areas where species naturally live is the most natural and safe way of conservation. Many species need their ecosystems, surroundings and nurturing to function well. This is also important for IPLCs, women and smallholder farmers who develop and conserve agricultural biodiversity and hold in situ community seed banks.

- Community-based customary sustainable use (CSU), law, management, and monitoring
CSU is Convention text (article 10c) and has its 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 genetic engineering technologies, e.g., gene drives, to “restore” populations of animals under threat of extinction. Gene drives are generally designed to eliminate species. However, gene drives are also being proposed to change the genetic expression in species for the purported goal of reversing an extinction trend. The genetic engineering of animals, gene drive technologies and their unintended and permanent consequences for wild species and ecosystems raise extensive scientific concerns. 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

Mention Customary Sustainable Use (in addition to legal as in legal and customary use); otherwise, many IPLC practices risk exclusion. They are considered illegal under many national legislations.

- Sustainable regeneration

Ensure that all trade and use of wild species allows them to regenerate sustainably, ensuring safety for the health of people and ecosystems and respecting customary sustainable use.

- Halt, avoid or significantly reduce human-wildlife conflicts

Stronger wording, more ambition.

Target 6: Invasive Alien Species

The main aim of the target

- Further introduction of IAS should be prevented

It is vital to address the underlying causes and drivers of IAS: i.e., large industrial agricultural monocultures where IAS multiply rapidly; chemical destruction of species that could use IAS as prey; and to identify pathways of introduction and transfer of IAS, e.g. movement of plants around the world without proper prevention and control measures, pet trade, use of pesticides that 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.

- “50%” should be “80%”

IAS constitute a significant threat to biodiversity, ecosystems and sustainable, biodiverse agriculture; they must be controlled as much as possible. 50% is not sufficient.

Elements that should NOT be part of the target

- Gene drives

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

- 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 address the underlying causes of invasive species, and the text should emphasise traditional knowledge, land management, and stewardship.

Elements that should be part of the target

- Identify IAS

Continuous follow-up of the appearance of new IAS is as essential as pre-empting new introductions, e.g. through analyses of introduction pathways. Awareness of IAS presence is critical, and early identification makes controlling them more likely.

- 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.

Target 7: Pollution

Scope of the target

- 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 is essential to keep these quantifications, in addition to the fact that pollutants need to be held at levels non-detrimental to biodiversity. In this way, progress can be measured through the amounts by which these pollutants are reduced. Concerning plastic waste and the proposal to phase out Highly Hazardous Pesticides, the quantifiable target should be elimination to zero.

Elements that should be part of the target

- Reduce pollution from all sources

All pollutants must be addressed, even if the list is not exhaustive or 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 effects so that they have no harmful impact on the ecosystem. Gender-differentiated impacts should be taken into account and monitored through appropriate indicators.

- Phasing out Highly Hazardous Pesticides

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

- A hazard-based approach to pesticides, rather than risk mitigation

A “hazard-based” approach focuses on limiting the release of the hazardous chemical into the environment (e.g. through bans and restrictions), while a “risk-based” approach tends to emphasise managing / mitigating risks in use (e.g. more accurate application methods, no-spray buffer zones). The most reliable, efficient, and cost-effective way of reducing pesticide harm to biodiversity (and human health) is to focus on eliminating the most hazardous pesticides at source rather than during their use. This means reducing synthetic pesticide use and toxicity, by a measurable quantity, with priority given to phasing out Highly Hazardous Pesticides.

- Reducing nutrients lost to the environment

Excessive use of manure and other organic and synthetic fertilisers leads to pollution levels that destroy sensitive plants and animals. They also negatively affect water bodies and terrestrial ecosystems such as meadows and forests. Synthetic fertilisers have devastating impacts on soils and their microbial communities, reducing their health and fertility over time until those soils become unable to yield a crop without them.

- Synthetic pesticides

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

- Light and noise pollution

Light pollution significantly impacts 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.

- Reduce agricultural practices that encourage the intensive use of pesticides

GM crops engineered to tolerate pesticides encourage the application of large amounts of agrotoxics, often from the air, with deadly impacts on biodiversity and the health of local communities, while the development of disease and weed resistance means the application of additional toxins.

Further reading on target

- TWN briefing paper on the pesticides component of target 7: <https://www.twn.my/title2/biotk/2021/btk210802.htm>
- TWN/PAN International Briefing Paper: Hazard or Risk? Why a hazard-based pesticide target offers much better protection to biodiversity at a lower cost. <https://wp.twnnews.net/wp-content/uploads/2022/05/A-hazard-based-pesticide-target-better-protects-biodiversity.pdf>
- 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

The main element to be addressed in this target:

- The impacts of climate change and related 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

Wherever drivers lead to biodiversity loss and climate change, the CBD must 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 primary responsibility for regulating the reduction of GHG is with 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 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 GHG emissions from all sources, including from deforestation and agriculture and industrial-scale animal production.

- Avoidance of adverse effects and threats from policies addressing climate change

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

- Protecting and restoring ecosystem integrity and, in particular, primary ecosystems

These ecosystems contain the most terrestrial biodiversity, store the most carbon, and by retaining their biodiversity, are also the most stable, meaning their carbon is at the lowest risk of being released via natural disturbance.

- 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 the most to preserve biodiversity and the climate.

- Conservation of rich natural ecosystems

Natural ecosystems are paramount to preserving the climate AND biodiversity. Forests, peatlands, savannas and oceans, in particular, need protection to enable a stable planet.

- Ecosystem approach

Decision V/6 defined this concept, offering a very comprehensive understanding.

Climate mitigation and adaptation must comply with the CBD ecosystem approach. The extent to which carbon stocks are sustained as self-regenerating is crucial, so they must be embedded in natural ecosystems. Otherwise, plantations (usually fast-growing, often with alien or GM trees) may be planted with the claim that they offset emissions from industrial processes.

Elements that should NOT be part of the target

- Nature Based Solutions

Rather than being oriented to solving the biodiversity crisis, NBS is promoted and framed in the CBD as a solution for corporate sectors and portrayed as contributing to climate mitigation and adaptation. It risks introducing elements harmful to 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 the interests of businesses and policymakers would override human rights

concerns. There are no governance structures for NBS which could follow up on possible abuse of the term.

The term nature-based solutions is used in many different contexts, many of which are counterproductive for the environment. In particular, offsetting and greenwashing NBS-projects by corporations can undermine real biodiversity benefits. As UNEA has recognised, they might have long-term impacts on the climate regime.

- Geoengineering and BECCS

Decision X/33 of the CBD addresses the negative impacts of geoengineering on biodiversity. It 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 that relies heavily on plantations for biomass, which negatively impacts biodiversity.

- 10GTeq in emission reductions

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

Carbon storage varies widely across ecosystems and doesn't necessarily correlate with the richness of biodiversity. Using a carbon-based target could incentivise the destruction of species-rich ecosystems and the promotion of projects focused on carbon sequestration, such as monoculture tree plantations or BECCS projects.

- Carbon offsets

Offsets do not imply a reduction; at best, they mean a displacement from one site of emissions to another. More often, there is double-counting, baseline problems and others which imply that carbon offsets do not raise ambition but are a loss for the climate. As UNEA has recognised, they might have long-term impacts on the climate regime.

The CBD should facilitate biodiversity policies and not facilitate carbon offsetting.

- Focusing on high-carbon ecosystems

All ecosystems suffer from climate change, and they all have their contribution to the planetary system. The role of the CBD is to protect them all, independent of their carbon contribution. Focusing on specific ecosystems risks these being used as an offset for the climate. There is a risk that certain types of ecosystems, and even monoculture tree plantations, are imposed in places where they are not the natural habitat.

Further reading on target

- Briefing note on Target 8, Friends of the Earth International, 2021 <https://www.foei.org/wp-content/uploads/2021/10/Target-8-Briefing-note.pdf>
- Our Nature is Not Your Solution – and FAO's Plantations are even less of a Solution! Global Forest Coalition, 2020 <https://globalforestcoalition.org/faos-plantations/>
- Nature based solutions: a wolf in sheep's clothing, Friends of the Earth International <https://www.foei.org/publication/nature-based-solutions-a-wolf-in-sheeps-clothing/>
- A Leap in the Dark: The Dangers of Bioenergy with Carbon Capture and Storage (BECCS), Friends of the Earth International, 2021, 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.

If benefits were at the beginning, the target would prioritise these 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.

If benefits to humans were at the centre of this target, it would be measured by the amount of benefits delivered, which would be an incentive to produce/use more rather than managing sustainably.

Elements that should be part of the target

- Pollination

Pollination is one of the most critical and vulnerable ecosystem functions for plant and insect biodiversity and global food security.

- Equitable sharing of benefits

The benefits of nature are not equitably shared. Overuse by some will affect the overall availability of benefits for all.

- Livelihoods

The livelihoods of millions of people, 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, gender-differentiated governance and management systems of lands, waters and territories of indigenous and local communities and their involvement in the overall governance of these areas should be recognised, 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 upon within the CBD. It is a concept promoted by the biotechnology industry to describe the use of biotechnological products in production processes and by large agro-industrial corporations and forestry companies. It is not the CBD's role to advocate the increase of a particular form of industrial production but to ensure biosafety, biodiversity conservation, 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, suggesting that ecosystems' primary function is to serve human requirements.

- “Agro-biodiversity” with “agricultural biodiversity”

This is the correct term, as defined in the CBD.

Elements that should be part of the target

- Protecting pollinators

Pollinators are vital for agriculture and biodiversity but are often highly endangered. Their disappearance would have devastating impacts.

- Local seed systems and in situ conservation

These are essential to protect local varieties and related knowledge, ever more vital because of climate change and biodiversity loss. Community seed banks, often run by women, are essential to such protection and conservation. There may also be a role for regional or territorial seed banks serving as a backup to local community seed banks.

- Soil biodiversity

This is fundamental to biodiversity and food production, yet many industrial agriculture practices progressively destroy the soil.

- Ensuring that at least 25 per cent of agricultural land is managed under agro-ecological or other biodiversity-friendly practices

To ensure that agricultural biodiversity is sustained and enhanced in all areas, for the reasons given above, the IPC for food sovereignty has argued that the area used for genetically uniform production should be halved by 2030 and be increasingly replaced by biodiverse agroecological systems developed in the framework of food sovereignty. 25% should therefore be the minimum, and we should aim for 50%.

- Transform food systems

Urgent food systems transformation towards biodiverse agroecology is essential. Industrial production systems, propped up by agrochemicals, not only lack inherent resilience and are very vulnerable to climate change but also drastically reduce agricultural biodiversity through their genetically uniform production systems and their use of biocides.

- Sustainable use based on agro-ecology, ecosystem approaches and environmental principles-

To be sustainable, all use must be based on these principles, which are also essential to the CBD itself. Indigenous food systems have consistently proven to sustain yields over time while conserving, sustainably using and enhancing biodiversity, providing a basis for adequate nutrition and secure farm livelihoods, especially for small producers. Agroecology also provides farmers with the means to spread risks during adverse and extreme weather events, adapt to climate change and build climate resilience. Such food systems are also favourable for biodiversity and climate.

- In close cooperation with custodians of biodiversity, in particular smallholder farmers, indigenous food systems and women

These are the people with the cultures, knowledge and skills that feed most of us and with whom we should cooperate, learn from and support.

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

IPBES has identified these sectors as the ones which most impact biodiversity. Their combined land use has a more extensive land occupancy than any other use. Thus their sustainability is crucial for global environmental sustainability. It also should be ensured that there is no regression from Sustainable Development Goal 15 and its target to halt all deforestation and forest degradation by 2020.

- Phasing out all unsustainable forms of production,

According to the IPBES, unsustainable agricultural production methods are the leading cause of biodiversity loss and worsen climate change impacts. Monoculture production is linked to the loss of biodiversity, especially agricultural biodiversity, and the use of agrochemicals which are devastating for biodiversity, ecosystems and human health. Clearcutting practices have been shown to be a highly destructive form of forestry and should be banned.

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

Excessive use of manure and other organic and synthetic fertilisers leads to pollution levels that destroy soil fertility, sensitive plants and animals. This affects water bodies and terrestrial ecosystems such as meadows and forests. The GBF should call for the abolition of synthetic fertilisers altogether.

- Support for farmers' seed systems

Seed diversity is essential for agricultural biodiversity. Small-scale producers, particularly indigenous peoples and local communities, women, pastoralists and fishers, ensure the preservation and enhancement of biodiverse seed systems. These should be protected through in situ and on-farm conservation, ensuring their secure land, water and sea tenure. Elements that should NOT be part of the target

- Sustainable intensification

Sustainable intensification focuses on productivity, technology and capital-intensive production rather than on a structural transformation of food systems via ecological, economic, social and political change. Some practices include reducing tillage through GM crops or trees or reducing the carbon intensity of industrial livestock. However, many of those techniques have severe impacts on biodiversity.

Sustainable intensification is often proposed as a way to 'spare' land for biodiversity protection, but it actually implies industrial monoculture agriculture with large applications of agrochemicals damaging to biodiversity and human health. We need land sharing, not land sparing.

- Increased productivity

In many cases, productivity is contrary to biodiversity concerns, so including it could lead to further loss of biodiversity.

Productivity is the competence of the FAO; the CBD has to ensure that those productive methods are compatible with biodiversity conservation.

- innovation

Innovation implies the application of new technologies whose future impacts we do not yet understand and which could be highly detrimental

- Beneficial biotechnology applications for agricultural productivity

Biotechnology applications can imply new genetic engineering techniques such as genome editing or gene drives to address e.g. invasive alien species. Its impacts are not well understood. However, we already know that current GM crops have helped build monoculture agriculture, causing small farmers to be driven off their land and destroying forests/biodiversity.

- Efficiency

The word signals industrial monoculture agriculture, often promoted based on its large scale, mechanisation and little need for human intervention.

- Climate resilient crops

The context in which this text appears makes it clear that it indicates the use of innovation, developing, for example, gene-edited crops that are marketed as climate resilient. However, there are varieties grown by IPLCs with properties that have not been adequately assessed for their climate resilience and which risk being lost as local communities are driven off their land.

- Extraction

Intensive monoculture agriculture and forestry is a form of extraction as damaging as mining. Agriculture is not about extraction and cultivation; forests should not be subject to extractivism.

- Agricultural productivity

The aim of an agriculture target in the CBD is to ensure that agriculture is not damaging to biodiversity. Productivity is a concern of other spaces, such as the FAO.

Productivity should not be the primary aim of agriculture but rather support for biodiverse crop and soil systems without the application of agrottoxics and artificial fertilisers. Productivity is the primary aim of industrial agriculture that takes precedence over all other values, to the detriment of biodiversity, ecosystems and people.

Further reading on target

- Sustainable intensification: Green-washing conventional intensive agriculture, ECO, March 2022 <https://eco2022cbdalliance.blogspot.com/2022/03/sustainable-intensification-green.html>
- Replanting Agricultural Biodiversity in the CBD, Friends of the Earth International, 2022, <https://www.foei.org/publication/replanting-agricultural-biodiversity-in-the-cbd/>
- What's at Steak? Impacts of the industrial livestock and feedstock sector on forests, biodiversity, farmers and communities, Global Forest Coalition, 2016 <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** hazards and extreme events

Rather than just protection against them

- Maintain and enhance nature's contribution, in particular to the regulation of air and water

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 are not enough; they should be high in biodiversity. Increase the total area of green and blue spaces for healthy well-being in urban and other densely populated areas by 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 target addressing the 3rd objective of the CBD that does not include DSI will not keep up with the developments in technology which currently allow access without benefit sharing.

- Associated traditional knowledge

The CBD and Nagoya Protocol on Access and Benefit Sharing also apply 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 crucial role in the conservation and sustainable use of biodiversity. Sharing benefits equitably with them is a matter of justice and will also ensure better biodiversity stewardship.

- Co-operation on horizon scanning, assessment and monitoring

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

- Consistent with and do not run counter to the objectives of the Convention on Biological Diversity and the Nagoya Protocol

It is critical that ABS discussions in other fora and other instruments comply with and do not undermine the objectives of the CBD and Nagoya Protocol, inter alia, fair and equitable benefit-sharing.

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 to them.

Target 14: Governments

Elements to be replaced

- Replace “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 implementation and in the indicators, this tends to be reduced to “economic value”. “Considerations” implies that biodiversity must be duly considered, particularly when the project that would lead to destruction would be more profitable than any economic valuation of nature. “Issues and commitments” means any issue important for biodiversity and any commitment parties have made to biodiversity.

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 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 in order to be more competitive.

- Align all new and existing policies and financial flows

The integration of all biodiversity issues and commitments into policies, or in short, a “biodiversity check”, is needed for all new and existing policies to avoid negative impacts on biodiversity. Assessments of environmental, social, cultural, gender and human rights impacts should be comprehensively applied.

Development projects and other processes that destroy biodiversity and ecosystems are usually also harmful to social, cultural, gender and human rights.

Ultimately, all policies and financial flows must be compatible with the needs of biodiversity and of people and the planet, ensuring the achievement of the goals and targets of the GBF.

- Adopt NBSAPS as overarching and comprehensive policy instruments.

NBSAPS must be developed as comprehensive policy instruments and have political weight at the ministerial decision-making level. As a result, all policies, regulations, planning, financing assessment, public and private financial flows, poverty reduction and other state processes which affect biodiversity must 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 them would be a regression.

- Strategic environmental and technology assessments

Technologies should be required to undergo horizon scanning, assessment, and monitoring to avoid negative impacts and be regulated to prevent harm and prioritise the conservation of biodiversity.

Elements that should NOT be part of the target

- Recognise 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 opens the way to trading and offsetting, 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 should be prohibited altogether.

- Deep Sea mining with safeguards

The current wording on safeguards assumes that deep-sea mining will be allowed under certain circumstances. Deep-sea mining should not be allowed, and safeguards would not make it acceptable.

- And its multiple values

The mainstreaming document and the indicators make clear that even though the target talks about “multiple values”, their implementation concentrates on economic values only. Multiple values are important, but we need guarantees that implementation would take all of them into account, which is currently not the case.

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 a framework should ensure that all business and economic activities are sustainable and are in line with the needs of biodiversity and human rights.

Addressing elements in the right order

- The central element in this target must be governmental responsibility through rules, regulations.

Businesses are not obligated to change their behaviour because the CBD says so, as they are not actors under international law, but they are if governments regulate them. And the role of the CBD is to ensure governments cooperate on this.

- Take legal responsibility for infractions.

The placing of this element in the current text implies that businesses are the ones to take legal responsibility. It must be Governments and regulators who impose legal consequences upon businesses if and when they do not comply with environmental legislation.

- Human Rights

It is the duty of governments to ensure that businesses respect human rights. However, the position of the phrase human rights in the target implies that business will be responsible for their implementation. Unfortunately, businesses that promised to respect human rights in the past have been responsible for numerous violations.

Elements to be replaced:

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

The risks to businesses and financial institutions should not be the concern of the CBD, but the risks to biodiversity are at the core of the work of the CBD.

- “Eliminate” instead of “reduce” negative impacts

Human impacts on biodiversity have already surpassed planetary boundaries, particularly the biodiversity boundary. We urgently need to return to living within planetary boundaries. This requires stopping the impacts since merely reducing them actually means that negative impacts continue, which is not acceptable.

- “Take legal responsibility for infractions” by “be held legally responsible for their actions”

The difference is that in “take responsibility”, corporations can choose for themselves how they fulfil this responsibility, whereas “being held responsible” implies a policy framework that defines the implications of those responsibilities and related liabilities.

Elements that should be part of the target

- Operate within planetary boundaries

Several planetary boundaries have already been breached with severe and inequitable impacts. Stopping this must be the basis for planning and regulating all business activity.

- Legal, administrative and policy measures

The target must be based on all types of implementable regulatory measures issued by governments at all levels. It should also take into account the ongoing negotiations on a legally binding UN Treaty on Corporate Accountability.

- Penalties for infractions and liability and redress

Environmental regulation for business must be binding and implemented. This includes penalisation for infractions of environmental regulation, both nationally and internationally. Also, green labelling for products with negative environmental and social impacts must be penalised.

- Address conflicts of interest

Businesses with an economic interest in the outcome of regulations or environmental decision-making should not have a say in these regulations or decisions. A clear conflict of interest policy needs to be established. This applies to local, national and UN decision spaces. The independence of public institutions must not be compromised through their dependence on private sector financial support.

- Monitor and regulate all processes and activities of business

States must identify and monitor all processes and activities of business and finance which have adverse impacts on biodiversity

- Especially large and economically significant businesses

Large businesses work internationally, so international coordination of regulation is needed due to their size, power and transboundary characteristics. Large businesses have significantly more impact than small ones and have a greater capacity to implement measures than small ones.

- Those with significant impacts on biodiversity

Industrial agriculture, livestock farming, mining, and forestry are significant causes of biodiversity loss and thus require robust regulation.

- Ensure full transparency of business activities and their impacts

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

- Respect human rights

Business should be fully accountable for human rights violations, including Indigenous Peoples' and women's rights, throughout their product chains.

- Protect environmental defenders

Most environmental defenders whose rights are violated were resisting corporate projects in defence of nature. Protecting the life and rights of environmental defenders is intrinsically important, and their work is essential for ecosystem conservation.

- Telecoupling

A comprehensive analysis of the socioeconomic and environmental impacts of remote, coupled human and natural systems' interactions is required, as highlighted in the IPBES global assessment report.

- Cross-border responsibility regarding environmental impact

According to paragraphs 3 and 4b of the Convention, countries must take responsibility for damage to biodiversity in other countries, including through their production and consumption, and thus through regulating their businesses. Any overstepping of countries' fair and equitable footprint causes damage to other countries. This obligation is fundamental with regard to supply chains and telecoupling.

Based on CBD articles 3, 4b, 7c, 8 l, 14.1d & 22.1, it follows that developed country CBD parties with many transnational corporations under their jurisdiction are obliged to control them and to prevent adverse impacts. This includes halting trade in products that violate the CBD and the SDGs and providing resources for developing countries to regulate such TNCs (CBD articles 8m, 11, 14 and 20). Countries should also fully support elaborating a strong international legally binding instrument to regulate transnational corporations and other companies concerning human rights.

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 must self-regulate”, this doesn’t change the underlying problem of self-regulation. It also involves a direct conflict of interest.

- Subordinating implementation to the WTO or other trade agreements

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

- Sustainability of extraction

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

Businesses must verifiably, publicly and independently prove that their 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 more profound change is needed.

- Biodiversity-positive practice

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

- Provide information needed to consumers to enable the public to make responsible consumption choices

Governments need to ensure that businesses produce products compliant with environmental standards; they cannot leave this to the responsibility of consumers. Buying certified sustainable products is an option available only to the middle classes in the global North, and many certification schemes suffer from a lack of independent verification and conflicts of interest in general.

- Increase positive impacts

Businesses and production processes have inherent negative impacts. The references to “positive impacts” are mainly references to offsetting techniques. What needs to be ensured is to diminish the negative impacts without seeking to compensate them with so-called positives.

- Reduce biodiversity-related risks to business

The main issue is to reduce or avoid the risk business poses to biodiversity, not the other way round. Reducing the risk of declining biodiversity on business is an issue for business planning, possibly even for economy ministries, but NOT for the GBF. Unfortunately, the Taskforce on Nature-related Financial Disclosures (TNFD) is proposed as an indicator for target 15, even though it does not require companies to report on their biodiversity impacts, their human rights risks and negative impacts; the transparency of their supply and investment chains; complaints or grievances; or their lobby activities.

- Consistent and in harmony with [...] other international obligations

Environmental obligations must have priority over other international obligations, particularly such as WTO agreements and Free Trade Agreements. If such international obligations

undermine environmental legislation or action, they should be changed to avoid this. The CBD must also call for such changes.

Target 16: People

Scope of the target

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, nor do they have the power to make the necessary changes. Also, many poor people do not have the financial resources to make “responsible choices”.

It is the responsibility of governments to ensure that what companies consider environmental externalities are addressed in policies regarding production and consumption in ways that ensure fairness and equity. This target should be oriented towards governmental regulatory frameworks so that activities, consumerism and corporations which destroy biodiversity through promoting unregulated consumption choices are reduced to within planetary boundaries. This must include incentives and price policies and ensure that the use of resources for consumption is sustainable and equitable.

Elements that should be part of the target

- Policies regarding consumption products,

Governments must ensure that consumers don't buy products that damage the environment or human health and that the information about products is accurate and verifiable. This has to be done by establishing and adopting supportive policies and legislative or regulatory frameworks. Consumption reduction has to apply to all sectors.

- Prices that reflect the impact on biodiversity

There should be higher prices for products which are more harmful to the environment. Conscious consumption can't be the sole prerogative of the (higher) middle classes. Taxes and subsidies should get the balance right and ensure environmentally friendly products and healthy food, particularly healthy plant-based food, is accessible and affordable for all. The consumption of environmentally unfriendly and unhealthy products and food must be discouraged.

- Identify and monitor all processes of waste and consumption

States must identify and monitor all processes and activities related to waste and consumption that adversely impact the world's biodiversity and regulate and manage them. The CBD has to coordinate the efforts by states. Sustainable, primarily plant-based diets are necessary to avoid protein waste.

- 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 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 implies an overly significant 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 considerable impact on biodiversity through its consumption must address this and should not cite “culture” to avoid acting. If included, this element should be clearly indicated.

- Sustainable consumption choices

Individual consumers cannot be expected to make sustainable consumption choices on the basis of highly deficient information. Furthermore, sustainably labelled products are only available to the middle classes in the global north. Poorer people lack the economic means to make sustainable choices or would not be able to pay for products that include the environmental cost of production. Therefore, sustainable consumption choices cannot be the basis for global policies.

Target 17: Biotechnology

Elements that should be part of the target

- Precautionary Principle to address adverse impacts

Identify, prevent, and control biotechnology’s actual and potential adverse impacts 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 tend to be increasingly used; hence their risks should also be adequately addressed.

- Parts and products (from biotechnology)

The term Living Modified Organisms (LMOs) is now 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 itself is not the only point of impact; synthetic DNA/RNA, for example, can have direct and severe impacts on biodiversity conservation. 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 technology assessment

Horizon scanning, monitoring and technology assessment are relevant to modern biotechnology, including synthetic biology and other new genetic techniques, and would allow for the review of the rapid developments in the field and the anticipation, monitoring and assessment of their potential adverse effects with the application of the precautionary principle and the polluter pays principle.

- 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). Parties must take the necessary and appropriate legal, administrative and other measures to implement their commitments.

Article 14, Impact Assessment and minimising adverse impacts, is essential for the whole GBF, 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 about 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 concerning 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 by the CBD and international human rights standards such as the UN Declaration on the Rights of Indigenous Peoples. It should be respected at all times, and the FPIC of all potentially affected IPLCs obtained. However, applications for the use of gene drive organisms must additionally be discussed and decided at a global level, as any potential release has global implications. Local communities must not be made responsible for evaluating and deciding about such a complex and novel technology.

- Best available science

This phrase underlines the need to apply both a high standard and a range of scientific disciplines to assess innovations in biotechnology, their impacts and implications. This includes accessing relevant and up-to-date knowledge, identifying knowledge gaps and uncertainties, and drawing on different knowledge systems. This phrasing is in line with the precautionary approach.

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 arising from 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 should be applicable to all CBD parties.

- Sound Science

This phrase allows any sources presented as "scientific" to justify the use of new biotechnology and other innovations without ensuring the accuracy or relevance of said sources.

The phrase 'sound science' seeks to reassure without offering any justification for the science it claims to be 'sound'. It also avoids any consideration of uncertainty or lack of knowledge, both central to the precautionary approach. It fails to challenge assumptions and tends to be overly narrow and limited in its approach.

Target 18: Perverse Incentives

Elements to be replaced

- 500 billion USD should be replaced by 1 trillion USD per year of additional reduction, reaching an overall reduction of at least 4-6 trillion USD per year

The Dasgupta review shows that 4-6- trillion USD is a more probable estimate of perverse incentives, though probably still an underestimate. Incentives need to be reduced by 1 trillion USD annually because: a) not all have been identified, and 4-6 trillion is an underestimate and b) it is urgent to address this problem. The objective should be to eliminate all incentives that directly and indirectly damage biodiversity by 2030.

Elements that should be part of the target

- Eliminate, phase out, 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 that 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. Continuous evaluation is necessary, including a profound analysis of the institutional arrangements and structures that might drive the creation of perverse incentives and obstacles to perverse incentive reform, including the corporate capture of policy-making.

- 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 by ensuring that subsidies – to the extent that they benefit marginalised rightsholder groups – are reformed and coupled with alternatives that also benefit those rightsholder groups.

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

When financial savings are generated from subsidy reform, the resources should be used for activities that support biodiversity, human rights and social equity. Savings not repurposed for the same groups should be redistributed in an equitable and gender-just manner, especially to the Indigenous Peoples, local communities and women conserving and sustainably using biodiversity.

- Prioritising the stewardship of indigenous peoples and local communities

They understand and interact with local ecosystems most closely and positively and are therefore vital to defending biodiversity as well as their related knowledge and cultures.

Elements that should NOT be part of the target

- Payments for environmental services

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

- In a manner consistent with WTO rules

Making the CBD subordinate to WTO decisions that may cause biodiversity loss is unacceptable. The WTO must 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 with 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_TWN%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 what is required for the implementation of the GBF and should be achieved by 2025

The finance provided should be proportional to what is needed for the planet, not merely what governments feel they can spare. It must be supplied early enough to ensure sufficient time to produce the desired effects.

Elements to be replaced

- Replace “Maximise co-benefits and synergies with the Paris Agreement” with “ensure that biodiversity finance is **new and additional** to those in the Paris Agreement.”

‘Maximising co-benefits and synergies’ or ‘aligned with’ would allow double counting, i.e. developed countries could say that their climate financing is also biodiversity financing and therefore, there is no need to provide more funds for biodiversity. This would allow them, once again, to renege on their obligations in both the CBD and UNFCCC to provide new and additional financial resources to developing countries.

Elements that should be part of the target

- Implement 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.

- Multilateral tax reform and addressing sovereign debts

Tax reform and debt justice would counter the debt-austerity nexus, which limits developing countries’ capacity to reach their biodiversity targets. It would also begin to correct the historical 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, preserving 80% of the most intact ecosystems. Yet they often lack the resources to do so or are coerced into signing contracts with damaging industries because of poverty.

- Public financial resources

Governments must be responsible for providing this money. Private finance has so far only been provided in exchange for lenient regulation, access to resources, or greenwashing. This would undermine the implementation of the GBF.

- Developed-country Parties

They should lead the way in providing finance (as article 20 of the CBD makes clear)

- International finance institutions and multilateral development banks

Governments need to regulate these with careful oversight to ensure they provide finance to those countries most in need, rather than funding corporate interests, and they need to align all funding flows with the CBD.

- Including by addressing sovereign debt in just and equitable ways

Sovereign debt should, in many cases, be cancelled as it constitutes an unjust burden and has often effectively been fully repaid already.

- Aligning financial flows

In line with the resource mobilisation strategy, it should be ensured that all financial flows are aligned with the CBD and its objectives and relevant human rights obligations.

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

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

Elements that should NOT be part of the target

- Private finance

There may be interests or obligations connected with private finance that contradict 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 a favourable 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 biodiversity destruction.

- Innovative financial resources

Many innovative finance instruments are related to the 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-supportive outcomes and sustainability. Instead, there is a risk of private gains and social losses, as blended finance is meant to guarantee returns to investors and investment bankers who put money into projects that claim to protect peoples and biodiversity.

- Nature-positive economies

This phrasing is not part of CBD language. It is ambiguous and enables offsetting, as the documents on “Nature Positive” clearly demonstrate, with “Net Gain” as its main proposal.

- 700 billion United States dollars, including a reduction of 500 billion United States dollars in harmful subsidies and conservation action amounting to 200 billion United States dollars

This is unacceptable because it seeks to set reductions in subsidies against funding to be transferred, so reducing that funding to 200 billion USD, whereas these reductions in subsidies should be additional transfers, adding up to some 1,200 billion USD, and they must not be controlled by those who previously benefited from them.

- Building on climate financing

Biodiversity finance must be new and additional to climate finance and should not “build on climate finance” as this can easily lead to double-counting

- Through mainstreaming biodiversity across sectors and institutions and strengthening the use of positive economic incentives stimulating innovative schemes such as payment for ecosystem services and calling on domestic development banks to increase their funding

Finance should be provided by additional, stable and predictable government funding. However, finance provided by “mainstreaming”, by “positive economic incentives”, “innovative schemes” and by “payment for ecosystem services” is not the type of finance that will be beneficial for biodiversity or IPLCs. Instead, it serves corporate interests, e.g. by allowing offsetting, which ultimately allows for the further destruction of ecosystems and greenwashing.

- Nature-based solutions and ecosystem-based approaches, payment for environmental ecosystem services, green bonds, biodiversity offsets, carbon credits, and debt-for-nature swaps

Most of this language is unacceptable because it encourages the monetising and marketing of biodiversity and seeks to avoid immediate action. Many of these financial resources also come with significant negative impacts on the rights and livelihoods of Indigenous Peoples, local communities and women.

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 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.

The addition of this wording to Target 19.2 would be in accordance with Articles 7 and 14 of the Convention, which mandate Parties to carry out the identification of processes and categories of activities which have or are likely to have significant adverse impacts on biological diversity, and to monitor their effects, and to conduct impact assessments. It would also be in accordance with Article 16 of the Convention, which stipulates that technologies that are accessed and transferred "do not cause significant damage to the environment".

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:

- Structure of target

Currently, the target is structured so that the traditional knowledge of Indigenous Peoples (and local communities) is merely part of **making knowledge available**. Instead, it should be made clear that the traditional knowledge of indigenous peoples and local communities,

especially women, may only be made available with their verified free, prior and informed consent. Hence the words 'but only with' should be added before 'their free, prior consent'.

Elements that should be part of the target

- Protection of traditional knowledge and its custodians

Under Article 8(j) of the Convention, Parties have undertaken to respect, preserve and maintain the knowledge, innovations and practices of indigenous peoples and local communities relevant for the conservation of biological diversity and to promote their wider application with the approval of knowledge holders

- Women's traditional knowledge

Women have specialised knowledge of biodiversity that needs to be recognised and protected.

Elements that should NOT be part of the target

- Traditional Knowledge is available to decision-makers

Currently, the wording of this target risks establishing 'open access' to Traditional Knowledge and no protection over the IPR of traditional knowledge holders unless proper safeguards, FPIC and mutually agreed terms are in place. Lack of proper safeguards would also directly undermine the work and decisions under Article 8j of the Convention.

Target 21: Participation & rights holders

Scope of the target

- Respect for human rights and recognition of IPLC rights, including land, marine and resource rights

IPLCs have conserved 80% of existing biodiversity, but they only can do so where their rights are fully respected. Environmental defenders are killed – or their fundamental rights otherwise violated - while working to conserve the environment. Respect for their rights is vital for ensuring the defence of biodiversity and ecosystems.

- 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 are not 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 addressed.

Note that participation needs to be well defined, ensuring that it means actual involvement of rightsholder groups and avoiding consultations of types which are so specialised that the people can't give input or where those holding the consultation decide which answers are taken into account.

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 justice systems do not uphold them.

- The United Nations Declaration on the Rights of Indigenous Peoples and international human rights law

These provisions should be included in this target because access to justice for IPLCs and environmental human rights defenders is frequently denied and their lives endangered or lost because of violent invasions or extraction from their territories.

- The protection of environmental human rights defenders and their access to justice

More than 1,700 environmental defenders were murdered between 2012 and 2021. They were defending ecosystems. The CBD cannot pretend to protect biodiversity if it does not also protect those who defend it. Therefore, it is vital to protect their rights, especially as negative pressures on ecosystems are increasing.

Elements that should not be part of this target

- All relevant stakeholders

The word stakeholders opens the way to the involvement of business and finance; it is not CBD language. The CBD is a multilateral organisation, not a stakeholder organisation.

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/>
- Where we are now with the global governance of TNCS - a visual presentation, Harris Gleckman https://www.tni.org/files/article-downloads/13_msismvisualpresentations-governingtncsbymultilateralism_stateofplay.pdf

Target 22: Gender Equality

Scope of the target

It is of utmost importance from a human rights perspective and for the success of the post-2020 Global Biodiversity Framework to place gender equality at its core. Parties have agreed

that the GBF will be gender transformative; only a specific target will ensure the dedicated policy support and institutional capacity to guarantee the GBF is based on the rights, priorities, contributions and needs of women and girls in all their diversity.

Elements that should be part of the target

- Women's and girls' full and effective participation in decision-making and implementation of biodiversity policies.

Because of their multiple roles in using, protecting, restoring, and caring for biodiversity, Women and girls have acquired and passed down specific traditional, local and technical knowledge about biodiversity including agricultural biodiversity. When women are included in biodiversity decision-making, better outcomes are achieved.

This also contributes to eradicating gender-differentiated impacts of the biodiversity crisis, which include: violence and criminalisation due to gender-blind conservation policies; unequal distribution of unpaid domestic and care work burdens; deficient access to health, safety, education and employment, and at the same time lack of rights to information, participation and justice, including decision-making, where women and girls are underrepresented and ignored.

- Fair and equitable access and benefit sharing for women and girls resulting from the use of genetic and biological resources and their associated traditional knowledge.

There are multiple positive outcomes, ecological, social and economic, related to guaranteeing a gender-responsive ABS. Therefore, recognition of women's traditional knowledge, innovations and practices in sustainable use and management of genetic diversity must not be postponed. Furthermore, administrative or policy measures should be set up to ensure that their contributions are not treated as non-monetary or voluntary.

- Equitable access to rights over land and natural resources

Research shows that increasing women's control over land increases their local-level decision-making ability, boosting women's power as changemakers for persuading others in their households and communities to protect biodiversity. Furthermore, when women have greater economic power, including direct control over land, they are more likely to have enhanced political voice and power and, in turn, a more significant presence and influence in national and global policymaking on biodiversity.

Further reading on this target:

- Local sustainable development solutions for people, nature, and resilient communities, UNDP & Ecuador Initiative, 2020 <https://www.equatorinitiative.org/wp-content/uploads/2021/12/Mujeres-y-Ambiente-Case-Study-English-FNL.pdf>
- Women's rights to land and communal forest tenure: A way forward for research and policy agenda in Latin America [Bose et al, 2017](#);
- Women's land rights as a pathway to poverty reduction: A framework and review of available evidence [Meinzen-Dick et al, 2017](#)
- Advancing Women's Rights, Gender Equality and the Future of Biodiversity in the Post-2020 Global Biodiversity Framework, Women4Biodiversity, Rai, 2021 <https://www.ifpri.org/publication/womens-land-rights-pathway-poverty-reduction-framework-and-review-available-evidence>

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 clearly define this obligation and include 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 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 must address these crises collectively according to the principle of Common But Differentiated Responsibilities (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 levels 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 the global north and global south is enormous. Countries with high ecological footprints must be identified and sanctioned based on thorough and verifiable studies. The CBD must urgently address the current gross inequalities in ecological footprints and the inequitable geographic distribution of negative impacts.

- Avoid negative telecoupling

According to paragraphs 3 and 4b of the Convention, countries must take responsibility for the damage they may cause to biodiversity in other countries, including through their production and consumption.

Telecoupling: comprehensive analysis of the negative socioeconomic and environmental impacts of activities on people and biodiversity in distant parts of the planet, creating damaging interlinkages that may not at first be obvious. The concept is explained and demonstrated in the IPBES global assessment report.

Theory of Change (section D, GBF)

Scope of the Theory of Change

As currently set out in the GBF, the theory of change is actually a logical framework depicting the rationale of the GBF. Instead, it should include the indirect drivers of biodiversity loss, as well as interlinkages and feedback loops between the targets (e.g. between reducing threats and meeting people's needs).

The Theory of Change should be a roadmap for the structure of the targets and goals of the framework. Interlinkages should be inserted and depicted within the diagram, as it is not enough to simply mention within the paragraph that interlinkages exist. This also includes feedback loops between outcomes and actions, as the GBF design and implementation is an iterative, dynamic, participatory cycle rather than a linear process.

Elements to be replaced:

- 'Externalities' by 'indirect drivers of biodiversity loss'

The indirect drivers of biodiversity loss are now termed as 'externalities' This is incorrect as they are within the scope of the GBF. It is also not aligned with science. The IPBES framework uses the phrase 'indirect drivers of biodiversity loss', not 'externalities' and this terminology should also be used here. The indirect drivers of biodiversity loss are possibly even more important than the direct drivers. The section on indirect drivers should therefore be adequately represented in the diagram.