**Ref.: SCBD/SSSF/AS/SBG/CC/VA/**

**Notification June 25, 2020**

August 15, 2020

Dear Executive Secretary,

The undersigned organizations, Wild Heritage, Griffith University (Australia) and the Australian Rainforest Conservation Society are writing in response to the notification No. 2020-053

of June 25, 2020, **Peer review of draft documents for the twenty-fourth meeting of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA 24)**. This submission is regarding the document on the draft monitoring framework for the post-2020 global biodiversity framework.

With many thanks and best regards,

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| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** |
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| ***General Comments*** |
| 1. Wherever forest area/cover is mentioned, reporting should include a breakdown for each of the three separate FAO forest categories: primary forest, other naturally regenerated forest and planted forest.
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| 1. As drafted, the monitoring framework assumes that certification systems such as FSC and PEFC can be used as indicators to measure biodiversity as well as climate benefits. This is inappropriate because even certified logging results in substantial losses of biodiversity, causes significant emissions/reductions in carbon stocks and decreases the resistance and resilience of the remaining forest carbon stock. It is therefore not an appropriate indicator of biodiversity or climate benefit or of an OECM (Other Effective Area Based Conservation Measure).
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| ***Specific Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
| 2 | 2 | B | 1 | Should read “Trends in area of forest ecosystems **including a breakdown for each of the three UN FAO recognized forest categories i.e. primary forest, other naturally regenerated forest and planted forest**”. i.e. add “including a breakdown for each of the three UN FAO recognized forest categories i.e. primary forest, secondary forest and plantation”. |
| 2 | 2 | B | 15 | Should read “Trends in fragmentation and quality of forest ecosystems **including a breakdown for each of the three UN FAO recognized forest categories i.e. primary forest, other naturally regenerated forest and planted forest**”. i.e. add “including a breakdown for each of the three UN FAO recognized forest categories i.e. primary forest, other naturally regenerated forest and planted forest”. |
| 2 | 5 | D | 51 | This is not an appropriate indicator: “Number of certified forest areas under sustainable management with verified impacts on habitat conservation/ restoration”. Forest certification merely reduces negative impacts – it does not create or maintain habitat (in fact the opposite is often true). |
| 2 | 2 | D | 56 | This is not an appropriate indicator: “Number of certified forest areas under sustainable management with verified impacts on habitat conservation/ restoration”. Forest certification does not help regulate the climate as it produces substantial carbon emissions and reduces the carbon carrying capacity of forests. |
| 2 | 2 | D | 58 | This is not an appropriate indicator: “Number of certified forest areas under sustainable management with verified impacts on water quality”. Even certified logging can cause substantial decreases in water quality. |
| 2 | 8 | C | 6 | Should read “Forest area**, including a breakdown of each of the three UN FAO recognized forest categories i.e. primary forest, other naturally regenerated forest and planted forest,** as a proportion of total land area (SDG indicator 15.1.1)” i.e. add “including a breakdown of each of the three UN FAO recognized forest categories i.e. primary forest, other naturally regenerated forest and planted forest, as a proportion of total land area (SDG indicator 15.1.1)”. |
| 2 | 8 | C | 7 | Should read “primary forest deforestation and degradation” i.e. add “and degradation.” |
| 2 | 9 | B | 22 | As in previous comments: forest area should be reported for the three forest categories recognized by the FAO. |
|  |  |  |  | This is not an appropriate indicator for either protected areas or OECMs: “Number of certified forest areas under sustainable management with verified impacts on biodiversity conservation.” A verified reduction in negative impact though use of reduced impact logging techniques does not mean a forest undergoing logging is an effective conservation mechanism. It only means that the loss in biodiversity is not as high as it might have been if the forest had been logged without reduced impact practices.  |
| 2 | 20 | A,B,C | 125,126 | “Sustainable forest management” is not an appropriate indicator for measuring the sustainability or resilience of biodiversity. Again: it only measures a purported decrease in negative impacts relative to a hypothetical scenario where a forest is logged without using reduced impact techniques. It does not measure sustainability or resilience of biodiversity. |
| 2 | 29 | C | 177 | This is not an appropriate indicator: “Area of forest under sustainable management: total FSC and PEFC forest management certification” in no way guarantees that forest biodiversity is being sustained. As above, it only potentially indicates that impacts have been reduced. |

*Comments should be sent by e-mail to* *secretariat@cbd.int**.*