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Subject: Input from the Australian Industry Group on the zero draft of the new post-2020 Global Biodiversity Framework

The Australian Industry Group (Ai Group) welcomes the inclusive and participatory development of the Global Biodiversity Framework, particularly the current opportunity for non-party stakeholders to provide input on the zero draft recently distributed. Ai Group is a leading industry association in Australia, representing businesses of all sizes across many sectors, including manufacturing, construction, technology, energy, defence and more.

Ai Group strongly supports the overall vision of the Framework:

9. The vision of the Framework is a world of living in harmony with nature where: “By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people.”

Overall the suggested text of the zero draft is positive and the following brief comments are by exception – we hope they are of use in refining the text for the Kunming meeting.

B. 2030 and 2050 Goals

The intent of these goals is good, but there are some textual and conceptual problems:

- The goals and targets for 2030 and 2050 currently lack a base year or point of comparison. The text should either prescribe a base year, or specify that individual parties should choose base years. The latter is looser and more prone to gaming, but allows for variation in national data availability.
- Par 10(b) – the target for increasing “the abundance of species” appears to be general. Is it instead intended to refer more specifically to the abundance of species that are currently vulnerable, endangered or critically endangered? This would be more meaningful than an apparent reference to all species.
- Par 10(d)(iv) – nature-based solutions are likely to play a very important role in the fight against climate change. However it is unclear why a target should be set for the percentage of climate efforts that should come from nature based solutions, nor why this should be set through the Framework (as opposed to discussions under the United Nations Framework Convention on Climate Change). There may not be a strong enough evidence base to prescribe an optimal minimum share of effort from nature based solutions, and perverse outcomes are possible – such as discouraging cost-effective mitigation in industrial and energy systems. More appropriate climate mitigation goals (and action targets) may focus on removing barriers to nature-based solutions; and ensuring that nature-based solutions do not undermine biodiversity or human needs.

D. 2030 action targets

- Par 12(a)(4) – the proposed reduction target for pollution from excess nutrients, biocides, plastic waste and other sources – the main text is unclear whether this refers to stocks, flows or both. Addendum 1 refers to suggested indicators that are relevant to both. This should be clarified

(for instance, persistent ocean plastic pollution will remain a serious problem for some time even if flows of new plastic waste into the oceans decline sharply).

- Par 12(a)(5) – on its face the text appears to encourage parties to legalise the harvesting, trade and use of wild species, rather than (as presumably intended) to stamp out illegal harvesting etc. A better form of words might be “Ensure by 2030 there is no harvesting, trade or use of wild species other than according to law and at sustainable levels.”
- Par 12(a)(6) – as stated above, it’s unclear why we need a minimum percentage contribution of nature-based solutions to climate mitigation. The Paris Agreement sets overall mitigation goals and national contributions towards those goals are nationally determined. The evidence base for setting a minimum share of nature based solutions does not seem definitive. But there are real risks that nature based solutions are unable to be used, or that they are pursued poorly. Therefore a better target might be “Contribute to climate change mitigation and adaptation and disaster risk reduction by 2030, by removing unjustifiable barriers to nature-based climate solutions and avoiding negative impacts on biodiversity and food security.”

F. Enabling conditions

- Par 14(a) – participation of indigenous peoples and local communities and a recognition of their rights in the implementation of the framework – this is very positive. We are aware that in recent UNFCCC negotiations, references to indigenous rights have been controversial with some Parties. The reasons are unclear and we hope that in the Biodiversity context there will be greater consensus.
- Par 14(b) – participation of all relevant stakeholders – industry is strongly supportive of this. The full range of non-Party stakeholders should have a voice in the development, implementation and monitoring of the Framework and Party responses.

We hope the Kunming meeting is successful in refining and agreeing the Framework. Again, we are grateful for the open process.

Regards



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