**Guidelines and template for the review of the draft monitoring framework for the post-2020 global biodiversity framework**

1. ***Background***
2. The second meeting of the Open-ended Working Group on the Post-2020 Global Biodiversity Framework invited the Subsidiary Body on Scientific, Technical and Technological Advice at its twenty-fourth meeting to, among other things, carry out a scientific and technical review of the updated goals and targets, and related indicators and baselines, of the draft global biodiversity framework. Under agenda item 3 the Subsidiary Body will consider this issue.
3. Tables 1 and 2, presents a draft monitoring framework for the 2050 Goals and the 2030 targets respectively. These tables are being made available for the purposes of peer review. In both tables' interim formulations of the proposed 2050 goals and milestones and the 2030 targets are provided for context. Review comments are not being sought on these parts of the post-2020 global biodiversity framework at this time. Column A of the tables provides draft components of the goals and targets. Columns B and C of the tables provide draft monitoring elements and indicators to be used at the global level to monitor progress in the implementation of the post-2020 global biodiversity framework. Further column D provides information on the period baseline data is available for the indicator and on the frequency that the indicator is updated where known. Review comments are being sought on columns A, B, C and D only.

***II. Submitting Comments***

1. To ensure that your comments are given due consideration, please send them by e-mail to secretariat@cbd.int, at your earliest convenience but **no later than 25 July 2020**
2. When submitting comments, please adhere to the following guidelines as much as possible:
	1. Please provide all comments in writing and in an MS Word or similar document format using the table provided below.
	2. Please provide full contact information for the individual/Government/organization submitting the comments.
	3. Please avoid commenting on issues related to grammar, spelling, or punctuation, unless it affects the overall meaning of the text, as the document will be edited as the final draft is prepared.
	4. To facilitate the revision process please be as specific as possible in your comments. In areas where you feel additional or alternative text or information is required, please suggest, if possible, what this text may look like or what should be included.
	5. If you refer to additional sources of information, please include these with your comments when possible or provide a complete reference or hyperlink.
	6. Please focus your comments on columns A (components the draft goals and targets), B (monitoring elements), C (indicators) and D (indicator baseline year and frequency of updates) of tables 1 and 2.
	7. If you are suggestion the inclusion of additional indicators please provide information on if the indicator is currently operational, the organization supporting its development, its baseline (i.e. the year data is first available) and how frequently the indicator is updated (i.e. monthly, yearly, every two years etc.).
	8. All review comments will be posted on the webpage for the post-2020 global biodiversity framework in the interests of transparency
3. Should you have any questions regarding the review process, please contact secretariat@cbd.int.

***III. Template for Comments***

1. Please use the review template below when providing comments.
2. The complete draft of the monitoring framework has been released in a portable document format (PDF). For tables 1, 2 and 3 column letters and row numbers have been provided as well as page numbers. Please use these as a reference as illustrated in the table below. General comments can be included in the table by referring to Page 0 and Line 0.

**TEMPLATE FOR COMMENTS**

|  |
| --- |
| **Review comments on the draft monitoring framework for the post-2020 global biodiversity framework** |
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| ***General Comments*** |
|  |
| We recommend putting more emphasis on the root (or underlying) causes of biodiversity loss, as there is no reference to reducing consumption and changing our current economic system that enhances economic growth without integrating biodiversity externalities.For example, an indicator could be the 'Number of countries that are using Genuine Progress Indicator (GPI ) or other measures of beyond GDP, such as doughnut economy or wellbeing economy measures) that integrate biodiversity aspects.' |
| We propose to make the linkage between goals and targets clearer so that table 1 and table 2 will not be completely separate as they are currently. We suggest:1. A more logical flow on how Targets correspond to Goals is needed. For example,  place a column of Goals next to Targets.
2. Create a "Nexus Structure" where the framework flows from the intersection of critical issues (still aligning with the CBD mission and mandate). Align with IPBES' work towards a [nexus assessment](https://ipbes.net/nexus) (discussion in the IPBES [Global Assessment Chapter 5](https://ipbes.net/document-library-catalogue/chapter-5-pathways-towards-sustainable-future)) by realigning the structure to reflect the connected nature of the goals and targets.
 |
| We believe that the following changes would make the document easier to read and more action-oriented. 1. Rephrase the language in Goal Components and Monitoring Elements to be action-oriented instead of passive. Examples of changing language style:

- From "increased" to "increase."- From "protection of…" to "protect" or "are protected." 1. Remove the word "trends" from ALL Monitoring Elements and only use in Indicators.
2. Frame the overarching values so that biodiversity is the priority supported by the SDGs and climate goals (not the other way around). There is a need to reframe the components, elements, and indicators in a way that the connection to the overarching purpose of protecting and restoring biodiversity is transparent and linked at all times. (This is a divergence from the IPBES nexus discussion which is framed around the SDGs.)
 |
| Ensure that the final outcome (or biodiversity impact sought) is always evident throughout every aspect of the monitoring structure. It needs to be more precise and have a logical flow to understand better what is intermediate to meeting a goal and where is the end of the process in terms of improving biodiversity status, including the flow of steps. (Ex: Accounting for biodiversity is an intermediate goal, but how does this flow to the end goals which mainstreaming that the SEEA and national accounting framework should stimulate, as it is not the end goal). As in the biodiversity accounting example, some indicators may be able to have a logical flow into other indicators (if X-> then Y). If the SEEA framework is in place ->  indicators Y, Z need to increase/decrease. Linking the process/response indicators with final biodiversity outcome indicators is crucial in our view, to motivate the ones implementing and monitoring the implementation of the framework to aim for the end goal while still 'checking the box' for intermediate impact successes.  |
| We suggest to add a category per indicator so that the logical flow and structure will be better understood, as well as the link to the theory of change for the GBF: 1. Process/enabling conditions Indicators (e.g., putting policies or frameworks for biodiversity in place)
2. Intermediate Impact Indicators (e.g., reduction of threat, policies enacted upon)
3. Biodiversity/Social Outcomes Indicators (e.g., improved status of species/ecosystems).

This  suggestion is also in our UCCLAN submission to the CBD, Annex II, dated February 2020 - <https://www.cbd.int/api/v2013/documents/6C5F4785-F290-CF3E-36CF-26ED917F353D/attachments/UCCLAN.pdf> |
| We believe that the language can be more visionary and ambitious, considering that these are 2050 goals. The current phrasing does not reflect urgency or commensurate ambition. We suggest to explicitly emphasize that parties need to report milestones every 2-3 years. Also, it is best to conduct a review to identify indicators that can also be measured and reported on annually. |
| There is a need to **remove duplicates** across Monitoring Elements and Indicators, or highlight where duplications exist between targets so that it will be easier to follow.For example, Target 2.4  indicator on the Number of certified forest areas under sustainable management with verified impacts on biodiversity conservation (row 48) is not very different than the sustainability of supply chains in trends of certifications in target 9.3 (row 126). The indicator is Area of forest under sustainable management (row 126) is related to the one on row 48: total FSC and PEFC forest management certification since certification is a form of sustainable management. We acknowledge that indicator for FSC and PECF is not nested in row 48 indicator since areas under certification do not necessarily equate to verified impacts on conservation. There might still need to be two separate indicators - one of the areas under management plans (intermediate impact indicator) and areas under management with verified impact on conservation (biodiversity outcome indicator). However, they are not mutually exclusive and need to be somehow linked, coherent. The monitoring framework needs to show or indicate how they are connected and where possible flowing into each other.We also recommend simplifying, consolidating, and removing duplicates where possible. For instance, where there are multiple Monitoring Elements per Component, look to combine the elements under themes. |
| To monitor how governments are responding and overcoming barriers to implementation, we suggest adding an additional column for 'main barriers identified per target/goal' to tables 1 and 2. These can be formulated as quantitative and qualitative indicators updated annually based on experience gained from the 6th national report, where the CBD secretariat and parties can be the responsible reporting entity. Barrier identification was only introduced in the 6th report. In the new framework, we suggest that this solution-oriented problem-solving thinking. We have a unique opportunity to embed this in the GBF from the start to lead to more focused action plans that anticipate, monitor and tackle these barriers from the beginning of the GBF, thus improving future implementation of the GBF.For each target, governments should identify the main barriers to achieve the target/goal but also which enabling conditions will be needed per target/goal. The monitoring of enabling conditions in place and barriers tackled annually per target could be aggregated in table 1 under goal D as indicators named 'number of resolved obstacles or barriers' as well as '% of enabling conditions in place.' |
| There is a need to address better and minimise tradeoffs and also biodiversity and ecosystem dis-services in the monitoring element and indicators in general. |
| We suggest that to achieve a real long-term, transformational change for biodiversity, social scientists, and behavioral change, experts need to be part of a working group that examines the monitoring framework and proposes recommendations. These experts can include scientists that are involved with the IPBES values assessment as well as the upcoming Nexus and Transformational Change assessments. We also suggest that the enabling condition of leadership for biodiversity that is needed for implementation of all goals and targets also needs to be enhanced in discussions of SBI and SBSTTA before negotiations by parties, with relevant experts, to provide better social sciences basis for the framework. |
| ***Specific Comments*** |
| **Table** | **Page** | **Column letter** | **Row number** | **Comment** |
|  |  |  |  |  |
| 1 | 2 | A | 1 | We believe that "Natural" is not necessary for ecosystems once "biodiversity" is added. Natural is also a very subjective word that can be interpreted in many ways, thus not helpful here. We propose to revise the component: "Healthy, biodiverse, and climate change resilient ecosystems (terrestrial, freshwater and marine) have expanded in the area of [X%], per the milestones of Goal A." |
| 1 | 2 | C | 12 | Change "cumulative human impacts on marine ecosystems" to "all human impacts on marine ecosystems are reversed or are verifiably fully regenerative". |
| 1 | 2 | A-C | 15-28 | The indicator for A2 on  Ecosystem integrity andconnectivity (terrestrial, freshwater and marineecosystems) used does not imply the need for increased ecosystem connectivity. We believe that the components of connectivity and integrity should be separated. 1. **For the connectivity** **component** - The ultimate goal ought to be to have the different (forest and agriculture and urban) ecosystems connected.

We suggest adding urban areas as a connectivity monitoring element, adding an indicator(s) that measures the increase in connectivity Intra and inter ecosystems, including rivers, waterways, deltas, and urban areas. In addition to having an indicator(s) that measures increased connectivity, climate resilience of corridors could be considered, as future corridors need to be based on changing migration patterns due to climate change. An example of such indicators could be: * 'Number of ecosystems that are connected through climate-resilient corridors or buffers.'
* 'Proportion of ecosystems with climate-resilient corridors inter and intra other ecosystems.
1. **For the integrity component** - trends in soil quality could be an indicator of ecosystem integrity. We think that management effectiveness should also be a part of the integrity indicators as a process/response indicator.
 |
| 1 | 2 | B | 16 | Include an 'increase in connectivity between ecosystems' to ensure that farmlands connect or have buffers or corridors that connect ecosystems.  |
| 1 | 3 | B | 29 | The indicator used, with birds and mammal extinctions highlighted, assumes that only fauna can be used to determine extinction rates. We suggest adding more indicators for various taxa, which could also be based on parties' reporting on recorded extinctions.There should be other indicators that can be used to show species extinction, bearing in mind that habitat loss is also a measure of species extinction. We, therefore, need much deeper thought about how we can estimate the extinction rate accurately to improve the science behind conservation planning. |
| 1 | 3-4 | A | 29-33 & 42-50 | We propose to combine Components A3 and A6 to read: "Increase the area and integrity of especially vulnerable ecosystems and for species vulnerable to extinction inclusive of connective passages for species between these ecosystems." Improving the conservation of species as a critical tool is crucial also to understand the functionality and integrity of protected areas. We need to understand and clarify also that in many cases, protected areas/OECMs coverage is only intermediate impact indicators where the end goal should be favorable species status.There is also a need to add a climate change monitoring element here to ensure that change in species ranges and adaptation of species should be integrated into the planning of protected areas. |
| 1 | 3-4 | A | 34-41 | We propose to combine Components A4 and A5 to read: "**Increase the populations, health, and biodiversity of species',** including genetic diversity."- Note that "species" as initially described in this component is too ambiguous. For example, how do parties prioritise which species to address (globally threatened/locally threatened), including factoring in climate change elements that may affect the decline of species and change in species ranges.- Add trees and vegetation to the Monitoring Elements. |
| 1 | 4 | B | 36 | It is encouraging to see that the trends in the diversity of wild species have been included. Some of the indicators that can be used to measure it include; * 'the number of populations within species with a functional population size';
* - 'Proportion of populations maintained within species;
* ' Number of species and populations in which genetic diversity is being monitored using DNA and barcoding based methods' (<https://doi.org/10.1016/j.biocon.2020.108654>)
 |
| 1 | 5 | C | 51 | We suggest expanding the definition to 'all certified areas under sustainable management with verified impacts on habitat conservation/restorationIf the measure is certified areas, what is the reason for a specific mention only to forest indicators and not a general indication of certification programs? Currently, we are concerned that it excludes other certified management areas such as fisheries (e.g., MSC), that might also have verified impacts on habitats.  |
| 1 | 5 | C | 56 | The only indicator used for trends in regulation of climate relates to forestry. Additional indicators are required for other climate regulating ecosystems, particularly marine ones but also peatlands. The indicators for mangroves, seagrass, and saltmarshes under Goal A could all be used here, too, to represent the contribution of blue carbon to climate regulation, which are on par with terrestrial forests in terms of demonstrating trends in regulation of climate.  Other terrestrial indicators, e.g., soil carbon, could also be included. |
| 1 | 5-6 | A | 51-63 | We propose to reword the text so that it's not framed as nature existing to serve people and replace it with 'people benefiting from healthy nature.' For example - we propose rewording B1 to "The ability of nature to regulate climate, disasters, and other environmental fluctuations are resilient."We propose to change the Monitoring Elements to an umbrella with the elements listed. For example, regulations can be structured and implement for:* Habitat creation and maintenance
* etc….

we propose to move the wording of "trends information…" element to indicatorsWe also propose to add climate change adaptation and mitigation to the Components and Monitoring Elements. |
| 1 | 6 | C | 63 | One of the indicators for "Trends in the regulation of detrimental organisms and biological processes" could be: Number of zoonotic diseases in wildlife |
| 1 | 6 | B | 64 | While we appreciate the monitoring elements, we would like to highlight that the resources should be renewable biological resources to ensure the indicator does not encourage the use of biological resources that are damaging to biodiversity, e.g., deforestation and monoculture plantations for biofuels. For instance, what if biological resources are ancient growth forest biomass or unregulated agriculture of energy crops that are produced unsustainably? There is a need to address better and minimise tradeoffs and also biodiversity and ecosystem dis-services in the monitoring elements. |
| 1 | 6 | C | 64 | It is not clear whether this indicator promotes an increase or decrease in the provision of food and feed on biodiversity. However, for the sake of biodiversity, we ought not to encourage energy production from woody biomass, only from energy from biomass waste materials, once there is no other use for them.  |
| 1 | 6 | A | 64-67 | We propose rewording B2 to "Food, water, medicine, and other material needs are resilient and in balance with thriving ecosystems."  |
| 1 | 6 | A | 64-67 | We propose to aggregate Monitoring Elements to make "Provision of…" the umbrella with the elements listed below. The features should read:Provisions are created for:* Energy supplies
* Food and feed from biodiversity
* Materials and assistance from biodiversity
* etc.
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| 1 | 6 | B | 68 | An additional monitoring element to be measured could be trends in wildlife tourism. The World Bank 2018 report could be used as a baseline for measuring the extent of wildlife tourism, see <http://hdl.handle.net/10986/29417>  |
| 1 | 6 | A | 68-71 | We propose rewording B3 to "Culture linked to biodiversity  is protected and enhanced without harm to species and ecosystems." |
| 1 | 6 | B | 68-71 | We propose to add the following monitoring elements, to create an umbrella term, for example:* Cultural Integrity is protected, and resources are allocated accordingly
* Learning and inspiration opportunities accessible to all people
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| 1 | 6 | A | 72-76 | We propose to further build in links to climate and the SDGs, but while framing biodiversity as the priority!Reframe to something like: "Nations that have high biodiversity have protected rights to develop uses within their own nation and employing their own peoples while also protecting biodiverse regions."- Corporations outside of the nations where resources are found should only be able to partner but not control resources and projects.We propose to add Monitoring Elements of: - "Local communities and indigenous peoples are empowered to manage and protect genetic resources."- "Mining, logging, fishing, building dams, farming, chemical production, and other industrial activities which may harm genetic resources are managed to eliminate harm." |
| 1 | 6 | B | 74 | While appreciating the elements of the target, we believe that other elements that are important in the monitoring elements are not being measured as reflected in this target. Fair and equitable sharing is of particular importance per the Nagoya protocol. Therefore appropriate indicators need to be identified that will measure fair and equitable, and these need to be reflected in the monitoring elements. |
| 1 | 6-7 | A | 77-85 | This goal is vast, depicting all means of implementation and enabling conditions, capacity building, and other issues, as per the grey encompassing sections in the Theory of Change for the GBF. The monitoring elements, however, are very narrow and need to be also reframed to allow systems change thinking that also encompasses human behavioral change elements as well as innovative economics and finance elements.We suggest making adjustments in the goal components that address the specific needs and realities of developing nations in such a way as to lay the groundwork for both justice, equity, and biodiversity protection.In Components, break out capacity development for governments and other levels and sectors of society as a topic separate from technologyAdd a component of legal and legislative changes to support GBF implementationWe also suggest adding a Goal Component addition that speaks directly to the underlying causes of biodiversity loss that underlies the implementation. This includes the urgent problem of relying on GDP as a success indicator, which is driving limitless growth. We suggest adding a component named 'Availability of new measures for economic success.' |
| 1 | 6 | A | 77 | While appreciating this component of the goal, we suggest recognising in-kind contributions as a resource, such as efforts (hours of work, etc.) dedicated by professionals from all fields and sectors. Thus extending resources and removing the word financial |
| 1 | 6-7 | B/C | 77-85 | Monitoring elements that encompass new measures of economic success can have indicators such as:* + 'number of countries that adopt a wellbeing economy,'
	+ 'countries integrating measures beyond GDP such as Genuine Progress Indicator (GPI) or the doughnut economy' on a local, national, and global level, which is inclusive to biodiversity and planetary wellbeing. These are essential to achieve effective implementation of the GBF and can be the driver for the necessary resources for achieving biodiversity goals and targets in the short and longer-term.

Include a Monitoring Element of "Subsidies changes, taxation changes, offshore banking, and global loan forgiveness that create funding streams for biodiversity goals."-Also for monitoring elements, there is a need to single out interdisciplinary and cross-sectoral collaboration as well as transboundary cooperation, inclusivity and stakeholder participation  |
| 1 | 7 | C | 78 | A proposed indicator, "The proportion of financial resources coming from the private sector over the total resources dedicated to biodiversity conservation."Another additional indicator could be the *"Amount of resources allocated by national government directly to biodiversity conservation programs and biodiversity mainstreaming elements."* |
| 1 | 7 | B/C | 82 – or make a new one at 86 | We believe capacity development for leadership is an entity in its own right. Therefore, we suggest adding: Biodiversity Leadership Development; Trends in resources for leadership development. Trends in leadership development activities, where the indicator can be developed based on process indicators such as 'biodiversity or conservation leadership development programmes globally.' |
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| 2 | 8 | C | 2 | The indicators proposed seem not to be related to the monitoring elements; perhaps these are related to lines 3 and 4? |
| 2 | 9 | A | 6-22 | There is a need to define what natural habitats means. Natural as a word is very vague and subject to many interpretations.  |
| 2 | 10 | C | 35 | Do the protected areas referred to in this line mean terrestrial protected areas, given that marine protected areas seem to be accounted for separately in row 36 below? There is a need to explicitly specify if the intention in row 35 is all protected areas or only terrestrial ones. |
| 2 | 11-12 | A&B | 35-52 | Propose simplifying and condensing some, such as T2.1 & T2.3, as well as T2.4 & T2.6.  |
| 2 | 11 | C | 39-42 | Recommend adding an indicator under this monitoring element as follows: "Protected area or OECM coverage of Ecologically or Biologically Significant Areas (EBSAs)." |
| 2 | 11 | C | 40 | The indicator only measures the Proportion of important terrestrial and freshwater sites. Should be an indicator for marine sites as well (e.g., see comment above re-tracking trends in PA or OECM coverage of EBSAs). |
| 2 | 12 | B | 48 | The indicator used does not relate very well with the monitoring element presented in this regard. When one considers the monitoring element, it is more focused on the Proportion of protected areas (either marine, freshwater, terrestrial) under various governance regimes. Furthermore, the proposed indicator of certified forestry relates to forest management, which should not be equated with protected areas. |
| 2 | 12 | A | 53-54 | Suggest adding this to GB and focusing this target to wildlife and human interactions.  |
| 2 | 12 | B | 55 | While we appreciate the need to measure the reduction in human-wildlife conflicts, we are of the view that this will be difficult to measure at the global level. Some countries keep track of human deaths originating from wildlife and other issues.The data on deaths of animals (and humans) is often collected locally. Therefore, we are not sure how it can be collated and by whom (CBD secretariat?) to provide a global picture that significantly addresses the issue at hand. |
| 2 | 13 | C | 56-66 | We propose to focus on trends in people finding alternative ways of income or people finding alternative uses of wildlife products, as well as technology innovations for resolving human-wildlife conflicts for improving human-wildlife interactions. |
| 2 | 12 | C | 59 | We note a bycatch related monitoring element is included under Target 8, but it also belongs here if we are talking about sustainable harvest. Suggest including this monitoring element here as well: "*Trends in population and extinction risk in bycatch species.*" |
| 2 | 13 | B | 62 | One possible indicator that could be used is "*the number of Non-Detriment Findings for CITES-listed species."* However, while NDFs may be in place, this does not necessarily guarantee sustainability, depending on the quality of the NDF. But it at least provides for a starting point and synergistic implementation of both conventions. |
| 2 | 13 | C | 64 | We propose that for T4.3, another important monitoring element would be "Trends in the proportion of people with culturally driven belief-based use of wildlife propelling illegal wildlife trade influenced positively towards pro-conservation behavior." |
| 2 | 13 | B | 65 | "Trends in the Proportion of biological resourcesused within the established limits/quotas" is only reliable as a measure of sustainability if those limits/quotas have been set sustainably, and commensurate conservation outcomes ensue for target populations. For example, many RFMOs and domestic fisheries set quotas far above limits recommended by scientific advisory bodies. Yet, such quotas would qualify under this element despite the fact they are unsustainable. |
| 2 | 14 | C | 67 | Suggest the following indicator: "number of border patrol officers, shipping companies, agricultural companies, and tourists/citizens that understand and can identify key IAS and as a result put in place measures and enabling conditions to prevent the introduction of IAS into their country."  |
| 2 | 16 | B | 91-96 | The monitoring element should be rephrased to be explicit that it relates to both terrestrial and underwater pollution, e.g., "Trends in levels of pollution from terrestrial and underwater noise." |
| 2 | 16 | C | 97 | We suggest a new indicator here - **National contribution of CO2 emissions from main sectors that are directly dependent on biodiversity use,** including the agriculture, bio-energy, and mining sectors. Measuring emissions could adopt the methodology of GHG protocol and include scope 1 2 and 3. It is crucial to include scope 3 to also monitor national CO2 emissions from imported goods. For example:* + CO2 emissions of meat imported from the Amazon region
	+ CO2 emissions from mining originating in clear-cutting and deforesting of areas in West Africa, based on agreed methodology such as life cycle analysis and Task Force on Climate-Related Financial Disclosures (TCFD). This indicator will complement the UNFCCC as it will be specifically focused on land use and biodiversity-use. Still, it could be synergistic and in collaboration with UNFCCC and aligned with the Paris agreements, NDCs and targets from SDG13, thus avoiding duplications and enhancing coherence among the Rio conventions.
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| 2 | 16 | A | 97-99 | While appreciating the importance of biodiversity (species, ecosystem and genetic) in climate change mitigation, the monitoring elements and corresponding indicators could be more explicit about certain types of habitats that make specific contributions, for example, indicators that provide for the trend in mangroves, seagrass, reefs, salt marshes, and wetlands given their contribution to climate regulation and coastal flood prevention |
| 2 | 17 | C | 101 | We appreciate that LDCs and SIDS are the most affected by the impacts of climate change. However, all countries should be able to develop nationally determined contributions and long term strategies for adaptation and mitigation of climate change impacts. Unless an additional monitoring element on mitigation is added with its standalone indicators, the current indicator must be changed to include all countries. |
| 2 | 18 | C | 104 | Sustainable fisheries should not be a percentage of GDP in small island developing States, least developed countries, and all countries (SDG indicator 14.4.1)as this might mean growth of fisheries in total instead of a decrease of unsustainable fishing. Therefore, we suggest having sustainable fisheries as a percentage of total fisheries per country. |
| 2 | 18 | C | 105-109 | "Sustainable fisheries management" must incorporate "ecosystem-based fisheries management." Incorporating it will help ensure benefits to communities from other avenues besides harvesting, such as tourism or recreation.Suggest including an additional indicator here as follows: "*Number of countries using ecosystem-based approaches to manage marine areas (SDG indicator 14.2.1)*" |
| 2 | 18 | C | 108 | Proposed edits to the indicator "*MCS certified catch as a percentage of total catch*" rather than an absolute number. |
| 2 | 19 | C | 110 | Proposal to extend the red list index to all marine mammals in addition to albatrosses and large petrels. |
| 2 | 19 | B | 114 | Proposal to include "*flora"* in the monitoring element,as both the target T8.2. and the indicators consider both fauna and flora |
| 2 | 25 | C | 152-156 | we recognize the importance of having biodiversity reflected in policies and planning at all levels. We recommend integrating the new biodiversity framework as well as biodiversity (economic and social) considerations across legal, economic, and financial frameworks and planning, such as constitutions and taxation. We, therefore, recommend adding new indicators, including "Number of countries that recognize nature's right to exist." "Number of countries that include biodiversity considerations into taxation regulation, including shifting taxation to natural resources from labor." Other indicators here could be:* + the Number of countries that are using Genuine Progress Indicator (GPI ) or other measures of beyond GDP, such as doughnut economy or wellbeing economy measures that integrate biodiversity aspects into an economy that is driven by planetary wellbeing rather than economic growth.

Some of the data is already mapped through the European Commission Beyond GDP project: <https://ec.europa.eu/environment/beyond_gdp/index_en.html>As well as briefing papers by the Wellbeing Economy Alliance (WeAll) and Wellbeing economy governments (WeGo) <https://wellbeingeconomy.org/>Also, we believe that we need impact indicators that monitor how positive biodiversity change is driven by integrating biodiversity within our policies, legal and economic system.  |
| 2 | 25 | C | 153 | This indicator could be further expanded to ensure coherence by enhancing national and international dialogues and mechanisms aimed at managing tradeoffs and interlinkages across the Global Biodiversity Framework targets, other MEAs, SDGs, and at national and local levels. This is in aim to achieve context-specific implementation of the new framework.We, therefore, recommend adjusting this indicator to reflect synergies and interlinkages between national and international policies, MEAs, and SDGs by changing the indicator to: "Number of countries with mechanisms in place to enhance policy coherence (synergies and interlinkages, while minimising negative interlinkages) with national and international policies, including trade agreements, MEAs and SDGs." |
| 2 | 26 | C | 157 | We suggest adding the following indicators c) number of countries, which have an alternative measure of wealth that integrates planetary and human wellbeing, similar to New Zealand's policy [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(19)30109-4/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667%2819%2930109-4/fulltext) as well as resources from the European Commission Beyond GDP project: <https://ec.europa.eu/environment/beyond_gdp/index_en.html>d) Number of countries that work with true-cost pricing, thus internalizing biodiversity externalities |
| 2 | 27 | C | 164 | It is not clear what is supposed to be measured with this indicator (Domestic material consumption, domestic material consumption per capita, and domestic material consumption per GDP (SDG indicators 8.4.2 and 12.2.2)). Still, given the fact that GDP is not a good measure of wellbeing (neither social nor environmental), and that it stimulates materialistic growth, we do not recommend using it. Instead, we recommend developing an alternative measure of wealth that takes the planetary and human well being into account, based on existing endeavors in this field, such as Stiglitz, etc. <https://read.oecd-ilibrary.org/economics/beyond-gdp_9789264307292-en#page2>  |
| 2 | 28 | C | 169-170 | Given the fact that GDP is not a good measure of wellbeing (neither social nor environmental), and that it stimulates materialistic growth, we do not recommend using it. We recommend changing the GDP indicator with an indicator based on an alternative measure of wealth that takes the planetary and human well being into account to "achieve global resource efficiency in consumption and production and to decouple economic growth from environmental degradation, following the 10-Year Framework of Programmes on Sustainable Consumption and Production "<https://sustainabledevelopment.un.org/content/documents/11803Official-List-of-Proposed-SDG-Indicators.pdf> |
| 2 | 30-31 | C | 180; 182-183; 189 | Given the fact that GDP is not a good measure of wellbeing (neither social nor environmental), and that it stimulates materialistic growth, we do not recommend using it. We recommend changing the GDP indicator with an indicator based on an alternative measure of wealth that takes the planetary and human well being into account to "achieve global resource efficiency in consumption and production and to decouple economic growth from environmental degradation, per the 10-Year Framework of Programmes on Sustainable Consumption and Production "<https://sustainabledevelopment.un.org/content/documents/11803Official-List-of-Proposed-SDG-Indicators.pdf> |
| 2 | 31 | A | 190 | We propose to revise  T15.2. "New vision of good quality of life, based on sustainability and new social norms for sustainability" New vision of good quality of life, based on sustainability and new cultural norms that include the importance of biodiversity and efforts to ensure it is flourishing. Justification: Culture is more specific than the broad term social, and the term sustainability is too generic and subject to various interpretations; thus needs to be more pointed to biodiversity. |
| 2 | 31 | A | 190-192 | T15.2. - add cultural norms so that it will read "social and cultural norms." |
| 2 | 33-34 | C | 205-210 | We recommend changing incentives in a way that leaves no one behind. Therefore an additional indicator that measures, for example,' Number of countries divesting from investing in activities harmful for biodiversity' e.g., divesting from fossil fuels and companies that their supply chains are contaminated with deforestation. |
| 2 | 34 | C | 210 | Given the fact that GDP is not a good measure of wellbeing (neither social nor environmental), and that it stimulates materialistic growth, we do not recommend using it. We recommend changing the GDP indicator with an indicator based on an alternative measure of wealth that takes the planetary and human well being into account to "achieve global resource efficiency in consumption and production and to decouple economic growth from environmental degradation, per the 10-Year Framework of Programmes on Sustainable Consumption and Production "<https://sustainabledevelopment.un.org/content/documents/11803Official-List-of-Proposed-SDG-Indicators.pdf> |
| 2 | 33-34 | C | 208-209 | Indicators listed are limited to agriculture and fossil fuels. These are important, but recommend also adding "*forestry and fisheries*." Suggest this additional monitoring element: "*Trends in the elimination and reduction of harmful fisheries subsidies under the WTO Agreement of Fisheries Subsidies.*" |

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