

## World Business Council for Sustainable Development review of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA-24) Item 3 peer review documents

The World Business Council for Sustainable Development (WBCSD) welcomes the opportunity to provide comments on the peer-review documents shared ahead of the SBSTTA-24 meetings taking place in November this year. In addition to our feedback for the Monitoring Framework template, we have provided our view from the private sector on the overall framework and we hope the Convention on Biological Diversity's secretariat is able to take these into account while preparing for SBSTTA-24.

We have also leveraged the policy recommendations from Business for Nature, of which WBCSD is a founding member. Please see the complete Business for Nature policy recommendations [here](#).

### 1. Feedback template for the draft Monitoring Framework

Review comments on the draft monitoring framework for the post-2020 global biodiversity framework				
Contact information				
<b>Surname:</b>	Kat			
<b>Given Name:</b>	Susanne			
<b>Government (if applicable):</b>	N/A			
<b>Organization:</b>	World Business Council for Sustainable Development			
<b>Address:</b>	Chemin Eugène-Rigot 2B, 1202 Geneva			
<b>City:</b>	Geneva			
<b>Country:</b>	Switzerland			
<b>E-mail:</b>	<a href="mailto:kat@wbcspd.org">kat@wbcspd.org</a>			
Comments				
Table	Page	Column letter	Row number	Comment
0	0	0	0	Please see our general comments on page 7 of this document added to the table
1	3	A2	18	B Trends in fragmentation and quality of dry and sub-humid lands, grasslands, and other terrestrial ecosystem - <i>does</i>

				<i>grassland include agricultural grassland? If so, add FAO Production Yearbook data as indicator &amp; baseline</i>
1	4	A5	37-39	Trends in the diversity of cultivated plants, farmed and domesticated animals – <i>add an indicator /baseline: number of new crop varieties and animal breeds released annually, as these also enhance genetic diversity.</i>
1	4	A6		On the protection of critical ecosystems “protected area coverage” and “coverage of other effective area-based conservation measures” assume protected areas are immune to environmental degradation. Those need to be overlaid with other land use change data in their respective ecosystems (e.g. tree cover loss for forests, Global mangrove forest cover for mangroves, etc).
1	5	B1	54	Trends in pollination and dispersal of seeds and other propagules.  The Indicator and baseline is only provided for pollinators. <i>Suggest deleting “dispersal of seeds and other propagules” unless a measurement is available to monitor</i>
1	5		51-71	Regarding Goal B, 2030 Milestone ii – we would recommend to facilitate a discussion about the creation of a Task Force for nature-related financial disclosure (TNFD) so that there is an aligned approach to private sector disclosure on nature.
1	5	C	56	We propose adding to the suggested indicators: No. of farms (or hectares of agricultural land) under sustainable management (according to carbon sequestration/use). The proposed indicator is not currently operational.
1	6	B1	63	Trends in regulation of detrimental organisms and biological processes - <i>indicator and baseline missing.</i>  What are “detrimental organisms and biological processes”? <i>Are IAS meant here? (they are covered below). Or are trends in the occurrence of disservices (incl through climate change – pests!) provided by nature such as diseases, pests, pathogenic organisms and public health challenges (epidemics, pandemics) meant?</i>
1	6		72-76	Goal C – we would like to stress the importance for Access & Benefits Sharing to be considered separately from the finance required for conservation.  In addition, we recommend the CBD to develop indicators to measure the creation of both monetary and non-monetary benefits, because benefits shared could also be in-kind and not only monetary. These indicators should be designed that

				<p>they can be used by all stakeholders to contribute to biodiversity conservation and sustainable use.</p> <p>The focus should be on safeguarding value creation and creating inclusive innovation that benefits biodiversity.</p>
1	6		77-85	<p>Goal D – we welcome the fact that the CBD SBSTTA secretariat includes a goal around resource mobilization. We would however like to highlight the importance of using the finance that is already available in a more nature-positive way, for instance by redirecting subsidies to incentivize nature positive actions, and include the correct incentives for actors to not harm nature.</p> <p>This could be achieved through:</p> <ul style="list-style-type: none"> <li>• Reforming subsidies and tax policies to finance a just transformation. A systemic change is required in subsidies and tax policies to reward land stewardship measures that deliver positive long-term outcomes on nature.</li> <li>• Promoting supply-chain and/or multi-sectoral collaboration mechanisms and joint action plans to value ecosystem services delivery and reward sustainable natural resources management.</li> <li>• Adopting quantifiable indicators for land and product stewardship measures.</li> </ul>
2	15		81-96	<p>Target 6 is not practically implementable or measurable and will need to define on a global level “harmful for biodiversity” and “excess of biocides”. These terms are better defined at country level It is the role of member parties to establish science-based regulatory schemes for biocides and herbicides, to avoid their excessive or more than necessary use and reduce any potential harmful impacts to biodiversity.</p> <p>To reduce any harmful impacts to biodiversity, we encourage the safe and responsible use of pesticides. We encourage land stewardship measures (including practices such as: cover cropping, minimum or no soil disturbance, crop rotation, agro-forestry, in-field grass strips, and agro-ecological infrastructures such as hedges, buffer strips or riparian forests, etc. to establish connectivity between them to reduce runoff to surface water and to provide wildlife corridors) and product stewardship measures (such as: anticounterfeit, personal protective equipment availability, bottle or container collection, and management of obsolete stock), in order to</p>

				<p>promote resource-efficiency, ensure safety and reduce water and soil pollution through over-use or misuse of pollutants.</p> <p>For instance, agri-innovation provides solutions to optimize the use of grower inputs and prevent overuse. Such innovation supports transformational changes in food production suitable for different farming systems while reducing harmful impacts on biodiversity. For example,</p> <ul style="list-style-type: none"> <li>• New breeding technologies help adapt crops to withstand climate change, and adapt to droughts, heatwaves and invasions of pests.</li> <li>• Selective pesticides do not affect beneficial insects.</li> <li>• GM crops with resistance to insects and herbicides can substantially simplify crop management and reduce crop losses, leading to increased yields. For instance, GM varieties of soybean, cotton, and maize produced 20%, 15%, and 7% higher yield, respectively, than non-GM varieties.<sup>1</sup></li> <li>• Biological organisms used as crop protection products help to reduce chemical residues in food.</li> <li>• Precision farming, e.g. drone applications/specialized nozzle and formulation innovations for robotic delivery, makes crop production more resource efficient.</li> </ul> <p>As such, indicators could be developed to define and assess “excessive” pesticide use or its impacts. This Component would be more effective with a focus to reduce the impact of pesticides rather than just broadly reduce the amount of pesticides used. This could be interpreted along similar lines to Target 15.1, though would need refinement to ensure that</p>
--	--	--	--	---

<sup>1</sup> From Mannion, A. M., & Morse, S. (2013). *GM crops 1996–2012: A review of agronomic, environmental and socio-economic impacts*, University of Reading.

<http://www.reading.ac.uk/geographyandenvironmentalscience/Research/ges-resGeogPapers.aspx>.

				ecological footprints are not sweepingly attributed to pesticide use. The proposed indicators are not currently operational.
2	15	C	0	
2	15	B	87	As herbicides <b>are</b> pesticides, we propose that only one Monitoring Element, for pesticides as a group, would be more suitable.
2	17	A		<b>For Target 7</b> , we would suggest including a component focused on improving carbon neutrality in agricultural value chains.
2	19	C	116	<p>The basic scheme of this indicator, to measure agricultural productivity per labor unit, should be considered elsewhere as well; for instance, under Target 9.1, “Trends in area of agriculture under sustainable practices”. We believe that improved agricultural productivity is an enabler of sustainable land use, removing pressure on agricultural expansion and ensuring that land designated for cultivation is used as effectively as possible.</p> <p><b>Precision agriculture</b>, where farmers combine modern seed breeding with digital technology to apply crop protection products and fertilizers precisely when and where needed, by using e.g. drone applications/specialized nozzle and formulation innovations for robotic delivery, makes an ideal complement to this. The proposed indicator is not currently operational.</p>
2	20	B	0	We would propose including “trend on the Number of ha of pollinator habitat/biodiversity field margins on agricultural land”. A model for this can be found in the report: <a href="#">“Multifunctional Field Margins: Assessing the benefits for nature, society and business”</a> – co-published by Syngenta, Arcadis, and Bioversity International.
2	20	B	120	As an indicator, we would propose including a “trend in the area of land under minimum or no soil disturbance, cover cropping, and crop rotation to protect soil from erosion and improve soil fertility and health”
2	21		127-133	<p>Target 10 lists nature-based solutions and an ecosystems approach. Would be good to define the distinction especially for the indicators mentioned. .</p> <p>On “trends in regulation of hazards and extreme events” (p 21, Target 10) – could the framework include some measure</p>

				of GDP or ROI/\$\$ saved from investment in nature-based resilience systems as this could be a valuable metric.
2	24	C	146	We believe, it is necessary to develop indicators capable of measuring both monetary <b>and</b> non-monetary benefit, potentially beyond the number of benefits sharing agreements in place alone. The CBD should develop such indicators for use by all stakeholders in the context of biodiversity conservation and sustainable use, with a focus on safeguarding value creation and conducive of innovation that benefits biodiversity. No such indicators are currently operational.
2	24	B	147-148	<p>We believe that it is necessary here to encourage a <b>“normalization” of terms regarding ABS</b>. Too many member parties have adopted definitions of ABS or genetic resources that contradict one another or are too broad. For instance, the overly restrictive approach to ABS has complicated and disincentivized innovation, particular in biotechnology; we believe this contradicts the aims of the CBD, hindering actors (both public and private) from developing more efficacious plant and life science technologies.</p> <p>As such, we advocate to interpret the terms of the Nagoya Protocol to support fair, equitable, simple, flexible, realistic, reasonable, responsive, considerate and practicable benefit-sharing mechanism. The terms of the Nagoya Protocol to facilitate access to and utilization of genetic resources should be interpreted based on a benefit-sharing mechanism that is:</p> <ul style="list-style-type: none"> <li>▪ <i>Fair and equitable</i>: to create an enabling environment that works for all and unbiased to any. Ideally, ABS terms should be normalized across all CBD members to remove disincentives which discourage (disallow) innovation.</li> <li>▪ <i>Simple</i>: clear processes and systems in place to support requests for genetic resources and navigation of ABS terms.</li> <li>▪ <i>Flexible</i>: considers different options for benefit-sharing (e.g. monetary and non-monetary) to allow for solutions best adapted to the situation of all parties.</li> <li>▪ <i>Realistic</i>: considers the expected value of the resource and investments required to develop a commercially viable product.</li> </ul>

				<ul style="list-style-type: none"> <li>▪ <i>Reasonable</i>: ensures a reasonable and sustainable sharing of benefits from the use of genetic resources. An overly broad and restrictive application of ABS requirements, which is detached from economic realities, can stifle such research.</li> <li>▪ <i>Responsive</i>: enables fast and efficient access and utilization to be achieved.</li> <li>▪ <i>Considerate</i>: considers business's needs for confidentiality.</li> <li>▪ <i>Practicable</i>: supports practical management of research and development results (e.g. joint ownership is more complex for all parties to manage than licenses / co-operation).</li> </ul> <ul style="list-style-type: none"> <li>○ <b><i>Help Parties to establish clear, simple and up-to-date ABS laws.</i></b> We suggest to support Parties to clearly identify which genetic resources are within or out of the scope of national ABS laws (pathogens and all other plant pests and weeds being excluded). It should also help parties to clearly identify what kinds of research use are within or out of scope (use as tools, screening for interest, gathering data for regulatory dossiers, resistance research of all kinds, etc.) and to clearly identify what the "safe date" is, before which any access or use will not be regulated.</li> <li>○ <b><i>Develop indicators to measure the creation of both monetary and non-monetary benefits.</i></b> CBD could develop such indicators for use by all stakeholders in the context of biodiversity conservation and sustainable use. The focus should be on safeguarding value creation and creating inclusive innovation that benefits biodiversity.</li> </ul> <p><b><i>Exclude all pathogens and other plant pests from national ABS laws.</i></b> Clearly exclude from regulation under national ABS laws all pathogens and other plant pests (insects and weeds).</p>
2	28			On "trends in sustainable waste management practices" - could the framework look at a metric that captures the

				“number/quality (measure of ambition of target) of national and subnational commitments to extended producer responsibility and or other waste recyclability/reuse/reduction laws”
2	31	A	193	Target 15.3 Include trends in participation in resource sharing schemes and recycling schemes.
2	32		194-204	Target 16. Include ‘ Measures to maximise the positive contribution of biotechnology on biodiversity and human health’
2	33		205-210	Target 17. Redirection of perverse subsidies and incentives that harm nature and biodiversity, should be linked to Goal D as part of resource mobilisation.
2	33	C	205-207	<p>Although the wording in Component T17.1 regards “positive ... incentives”, the indicators listed 205-207 do not seem to reflect this. Well-managed agricultural landscapes can serve to be beneficial to surrounding biodiversity and the environment; however, this comes at the cost of dedicating farm labour and resources to pro-biodiversity land stewardship.</p> <p>Financial incentives, potentially in the form of tax crediting or subsidy, should be encouraged as a form of positive reinforcement to compensate for resources and land dedicated to improving biodiversity, soil health, carbon sequestration, and so on. Indicators should reflect this, potentially by measuring the “Number of countries with biodiversity-relevant financial incentives”.</p> <p>As not all farmers have the awareness or expertise necessary to implement these strategies, two complementary indicators could include: “No. of countries with biodiversity-relevant awareness, education, and research schemes included in their national biodiversity action plans” and “Proportion of farmers included in such schemes”. It is not known whether such indicators are currently operational.</p> <p>This is essential to achieve the objectives of research and training defined in Article 12 of the CBD: to promote and cooperate in scientific advances in biological diversity research; to develop programs for scientific and technical education; and to promote technology transfer, collaboration and capacity building.</p>
1	2	A2	16	B2 Trends in farmland biodiversity and sustainability of agricultural land – <i>make sure to properly define farmland</i>

				<p><i>biodiversity. Do you mean agro-biodiversity? Or/and cropland-associated biodiversity (see def FAO BD Report)?</i> <b>C/D</b> indicator on sustainability: Use good practices elements as provided by FAO BD World Status Report, 2019 as a base. Follow-up by evaluating in 10ys time; collect recorded data e.g., on area under reduced-till How is this Target different to T9.1 in Table 2 line 118?</p>
2	15	T6.2	86	<p>T6.2. Reduction of pollution from biocides – <i>ensure proper definition.. Under line 88 <u>other</u> biocides are included. Define what they are e.g., detergents, disinfectants? to allow indicators.</i></p> <p>Trends in levels of pollution from excess pesticides – <i>no indicators are given. Worldwide pesticides (herbicides, insecticides etc.) are registered and are assessed for not having any harmful effects on ... the environment, provided that they are used sustainably. As excess is referred to, indicators could be the numbers of people trained in responsible pesticide use and waste management, number of countries with <b>pesticide</b> regulations or to <b>monitor the trends in precision farming (PF) applications as this allows for reduced, and more targeted, pesticide use.</b> One potential indicator could be the hectares of farmland or No. of Farms following land and product stewardship practices.</i></p> <p><b>N.B. PF is not just used by large farm holdings, many smallholder farm holdings also use PF technologies.</b></p>
2	20	T9.1	117-119	<p>Monitoring element: Trends in area of agriculture under sustainable practices.</p> <p><i>Indicator on sustainable agriculture: Use good ag practices elements such as those provided by FAO BD World Status Report, 2019 as a baseline. Follow-up by evaluating over time; possible operational indicator - collect recorded data e.g., on area under conservation-till /agriculture.</i></p> <p>How is this different from Table 1 A2?</p>
<p><b>2. General comments</b></p>				
0	0	0	0	<p>The COVID-19 pandemic has increased the <b>urgency to reverse nature loss and restore and conserve high-value ecosystems</b>, which is essential to achieve thriving and healthy communities and businesses. The Convention on Biological Diversity Conference of Parties fifteenth meeting will be a key moment and we would like to urge the parties to adopt an ambitious agreement that includes a clear and concise</p>

				roadmap on how the world will protect, restore and conserve nature.
0	0	0	0	<p><b>We are calling upon the CBD secretariat to support the discussions around creating an Apex goal for nature.</b> We can learn from lessons that have emerged in the climate space. Because of the existence of the overarching north star of working towards creating a 1.5 degree world and the adoption of science-based targets, business has been able to set ambitious quantitative targets, take the right actions, track progress and the Task-force on Climate-related Financial Disclosures (TCFD) brought alignment and transparency into reporting. <b>We are seeing similar positive developments starting in the nature space, but we need to speed up progress.</b> We need our governments to help set the direction for business action by adopting global targets and indicators informed by science to reverse the loss of nature. They need to be in line and link to the Long-term Strategic Approach to Mainstreaming. But in the absence of these science-based targets, which will take time to further be developed, we urge our leaders to help make the complex nature agenda simpler and provide direction and clarity of what we are all striving for. Working together with scientist, NGOs, experts and other leading actors will be key. Leading conservation, science and business organizations, co-convened by WWF and WBCSD, <b>have proposed such an apex nature target of “<a href="#">Zero net loss of nature from 2020, net positive by 2030, and full recovery by 2050</a>”</b> which constitutes an ambitious response to the challenges set by the IPBES report. <b>This can be nature’s equivalent to the “1.5 degree” goal for climate – our north star.</b></p>
0	0	0	0	<p>We welcome the multi-stakeholder process of the Post-2020 Global Biodiversity Framework. <b>We would however like to stress the importance of the private sector and that the role the private sector plays could be strengthened.</b> The growing number of commitments and actions that business implements to reverse biodiversity loss clearly shows that non-state actors can and should also play their part. We would like to ensure the vital role and positive contribution of business in design and implementation of the Framework. The goal aligns with SDG 8: <a href="#">Promote inclusive and sustainable economic growth</a> and SDG 17: <a href="#">Strengthen the means of implementation and revitalize the global partnership.</a> While business is not being considered to deliver the post-2020 biodiversity targets, the Framework cannot be realized</p>

				without business's meaningful engagement. The private sector has a critical role to play as a source of finance, as a driver of innovation and technological development, to improve its own practices to better protect and enhance biodiversity, and as a key engine of economic growth and employment. The Framework should promote collaboration across and within sectors, and set the right incentives so that we enable companies to protect or enhance biodiversity. For instance, those in food and agriculture which develop efficient technologies/practices to address and build resilience to climate change or invest in biodiversity enhancement whether in soils, field margins or in wider landscapes (through e.g. restoring riparian forests and wetlands, and landscape connectivity conservation, etc.).
0	0	0	0	We understand the biodiversity agenda is a complex one and we would like to congratulate the secretariat for bringing forward a comprehensive and well researched framework. We understand the Global Biodiversity Framework is directed at governments, however the private sector will be a key actor that will likely have to implement actions coming from the Framework as well. We would like to stress though that <b>from a business perspective this is rather complicated and detailed and needs alignment on more actionable, straightforward goals.</b> We would therefore like to stress again the importance of creating an Apex goal to simplify the agenda. Where possible, alignment with existing indicators is key, for instance using already existing Sustainable Development Goals indicators.
0	0	0	0	<b>Policy coherence and integration between the nature, climate, food, health, prosperity and inequality agendas is vital</b> to ensure that nature and biodiversity are no longer dealt with in a silo but as part of solutions to other societal problems. We welcome that the secretariat has provided the link to climate change, but this can be strengthened. In that regard, we would also like to call out the link to the food and agriculture system, especially with the Food System Summit in 2021, which will be a key moment. In addition mainstreaming of biodiversity needs to be across the Rio Conventions and other international agreements, across departments within country governments and into decision making by governments, business and society as a whole. The integration of the Mainstreaming work under the CBD with the Global Biodiversity Framework is key here.
0	0	0	0	We welcome the explicit mention in Goal B, 2030 Milestone ii, around financial disclosure. However, to maintain alignment around how information is disclosed, <b>we would recommend</b>

				<p>the CBD secretariat to consider (a) the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD) and the extent to which they can usefully be applied/extended to support the 2050 goals and 2030 targets, (b) learning from implementation of the TCFD recommendations including through <a href="#">WBCSD's Preparer Forums</a> and (c) initiatives already designed to support nature-related financial disclosure such as <a href="https://tnfd.info/">https://tnfd.info/</a> and the Climate Disclosure Standards Board <a href="https://www.cdsb.net/">https://www.cdsb.net/</a>. We make the suggestion of including this point of attention under the Long-term Strategic Approach to Mainstreaming.</p>
0	0	0	0	<p>Resource mobilization will be key for the world to deliver this new Agreement. We welcome the explicit mention of this in the monitoring framework, <b>but we would like to point to the fact that repurposing of existing subsidies could be strengthened.</b> From the private sector's point of view, we would urge for this topic to be made more explicit as this will be key to further unlock already existing resources. For example, of more than \$700 billion paid in agricultural subsidies each year, only 15% of this support goes towards building public goods (World Economic Forum "Future of Nature and Business" policy companion, 2020).</p>
0	0	0	0	<p>Farmers act as stewards of ecosystems and land that is sustainably managed by farming communities can produce great environmental benefits, e.g. sustainable agriculture, carbon sequestration, reduction in pollution, enhancement of biodiversity, etc. <b>As such the Framework should enable farmers, especially smallholders, to adopt agricultural technologies and practices which reduce farming's environmental footprint, and which improve soils, address water scarcity, and improve water availability, productivity, biodiversity, ecosystem health, nutrition and local communities' well-being.</b></p> <p>This could be achieved through:</p> <ul style="list-style-type: none"> <li>• Accelerating training and information flow between agri-industry and farmers to demonstrate the biodiversity benefits of agricultural technologies and practices and thereby enable informed decision-making by farmers.</li> <li>• Connecting consumers with farmers, so consumers can reward farmers for their biodiversity efforts and consumers can make informed decisions.</li> </ul>

0	0	0	0	Nature-based solutions will be a key part of the solution, delivering benefits for climate, nature and society. The current documents refer to both Nature-based Solutions and Ecosystem based approaches. <b>It would be good to align around one term to ensure clarity. We would like to highlight the International Union for Conservation of Nature’s (IUCN) definition</b> of nature-based solutions as “actions to protect, sustainably manage, and restore natural or modified ecosystems, that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits”.
0	0	0	0	
0	0	0	0	We welcome the fact that the CBD has included the link to indicator 6.3.2 of the Sustainable Development goals (SDG), however we would like to stress the fact that the SDG target 6.3 refers to “improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally”. Since, globally, 80% of all wastewater enters the environment without adequate treatment improved wastewater treatment, as a primary pollution prevention intervention, should be a priority for many countries. We therefore recommend that <b>SDG indicator 6.3.1: “Proportion of wastewater safely treated”</b> should be added to the indicator framework to strengthen the basis to treat all wastewater.
<b>3. Comments specific to Access &amp; Benefits Sharing (ABS) and Digital Sequence Information (DSI)</b>				
0	0	0	0	
0	0	0	0	▪
0	0	0	0	
0	0	0	0	<b>We would ask the support of the CBD to protect the principle of ongoing open access of publicly available Genetic Resource Sequence Data (GRSD)/DSI.</b> Maintaining open access to publicly available DSI reduces time and investment needed and unleashes research to meet the challenges of global food security (SDG 1) in fast-changing environmental or market circumstances, meaning faster solutions for growers and global populations and more stable

				economic prosperity for growers and local economies, improved local food security (SDG 2) and improved health and wellbeing (SDG 3) for local communities. These innovations and resulting benefits would be put at risk if DSI were regulated under the Nagoya Protocol. (GRSD refers to the description of the order of nucleotides (DNA or RNA), as found in nature. It does not include other molecules resulting from natural metabolic processes associated with or requiring the genetic resource)
0	0	0	0	The CBD should recognize the difference between GRSD and DSI and consider clarifying that GRSD covers only RNA and DNA.
0	0	0	0	We would like to highlight the <b>importance that any regulation of GRSD/DSI be forward looking, not retrospective</b> . In order to make regulations workable and provide for legal certainty, the CBD should emphasize the need to be forward looking. Most databases of sequence information do not record country of origin or date of access information or only a limited number of sequences. At present only 16% of the International Nucleotide Sequence Data Collaboration (INSDC) entries have a country of origin listed.