

Dear Secretariat,

Please see some high level comments below from Welsh Government.

Comments on the 'Indicators' paper

- We welcome the proposed selection criteria in section 2.2, but would like to see cost of data collection and analysis added to the list - monitoring and evaluation can be costly and there should not be a cost barrier to providing data. Some countries might find costs prohibitive.
- On the point regarding - 'scalable to global/national level', would also like to see sub-national level.
- Are the methods of data collection traditional, or have other methods been considered?
- In Wales we have adopted two indicators in relation to Green Space. These are described on pages 47 and 48 of the WIMD 2019 technical report <https://gov.wales/sites/default/files/statistics-and-research/2020-02/welsh-index-multiple-deprivation-2019-technical-report.pdf>
- Has consideration been made in relation to:
 1. movement of species into new habitat in response to climate change.
 2. increases in numbers and range of species that are NOT the result of conservation effort.

Column D. Period of availability of baseline data and frequency of updates

In many cases, no frequency of updates is provided –suggests frequency included **where known**, but is there an expectation this information will be updated before formalising the Framework?

Columns B and C Elements and Indicators – is there any sense of whether any Elements or indicators carry more weight than others? What are the plans to draw any firm conclusions about progress (or lack of) if some indicators are updated less frequently?

- We think there needs to be an equal concentration on indicators of transformative change - there are many more gaps in identified indicators for these targets - for e.g. in financing. While we recognise that development of these indicators is of a more recent nature, could the need for further work in this area be highlighted.

2050 Goal D - We note there will be one indicator (part of an indicator) on public spending on biodiversity.

[1]15.a.1 (b) revenue generated and finance mobilized from biodiversity-relevant economic instruments (SDG indicator 15.a.1)

Comment: We are interested to understand what evidence underpins this proposed indicator, and how this will be measured in practice, as we note that it may not necessarily be straightforward to capture (i.e. there will be indirect benefits to Biodiversity from some policies and programmes that will be harder to measure).

Comments on the 'Monitoring' paper:

Accuracy

- Background to the methodology would help inform comments on the indicators - possibly by use of hyperlinks.
- Definitions for the terminology would be of benefit (e.g. what is meant by 'protected areas'), to ensure consistency of interpretation.
- Could consideration be given to disaggregating to a sub-national level?

Clarity

- Referencing, or grouping, indicators using the Drivers, Pressures, State, Impacts and Responses (DPSIR) framework or similar would be helpful.
- A SWAT analysis of the indicators would also be useful, including whether the indicator for example is costly/cheap to produce and whether the methodology is established.
- There are many indicators which are duplicated for multiple targets and monitoring elements. We recognise that the repeated use of data helps to minimise costs but it would be helpful to provide more clarity over whether they are the same indicator or measured at different levels, eg ecosystem, species, or how they are nested.

Gaps

- We will circulate this to policy colleagues to check for any gaps and will highlight any either direct to CBD or at a later iteration
- There are some very specific and localised indicators e.g. Mangrove cover. In Wales peatland and grassland cover are useful specific indicators - there could be flexibility for member states to interpret indicators for specialised habitat types.
- We think there needs to be an equal concentration on indicators of transformative change - there are many more gaps in identified indicators for

these targets - for e.g. in financing. While we recognise that development of these indicators is of a more recent nature, could the need for further work in this area be highlighted.

Comments on the SDG paper:

- We welcome this alignment and agree it will be come increasingly important to mainstream biodiversity.

Kind regards

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Is-adran y Tir, Natur a Choedwigaeth - Land, Nature and Forestry Division

Adran yr Amgylchedd a Materion Gwledig - Department for Environment and Rural Affairs

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