

# General comments and feedback from the workshops on the Global Biodiversity Framework

- XXX
- Heejo's comments

## Comment #1: Balancing the degree of technical clarity and the language for laypersons - “nature” and “nature’s contributions to people”:

These expressions may have been deliberately chosen - to refer to the inherently difficult-to- describe concepts, or to better speak to laypersons and avoid jargon (*nature* for ecological integrity and *nature’s contribution to people* for ecosystem services). But their effective is questionable, especially considering the loss of technical clarity.

Laypersons would still likely question what we mean to “account for nature” or what we refer to by “all categories of nature’s contribution to people”. These may be just as vague as the jargons.

In the end, the GBF needs to be clear to the specialists and technocrats who either volunteer or are appointed to make progress towards the GBF goals. For my purpose of suggesting some revisions in the milestones and targets related to mainstreaming and values, I have in most cases still kept ‘nature’ and ‘nature’s contribution’ but think more clarity will be gained if technical terms are used.

One solution may be that there are two versions of the GBF: one technical, one layperson version. It would be wonderful if a layperson version actually takes almost a book form - thoroughly unpacking concepts, the problems, and our roles. A family can pick up at a national park or supermarket!

## Comment #2: Making the Milestones ‘visible in sight’.

First, a question: There will be a set of indicators for all levels (goals, milestones, targets) - is that correct? Having good indicators (SMART) will certainly help bring Milestones into a navigable realm. Still, I believe giving more nuance to the milestone statements

will make them more useful.

Despite the Milestones being outcome statements, those for Goal B are too aspirational and elusive. Some finesse is needed for a milestone to be functional in giving some direction in the journey towards the Goal. When I look at other goals' milestones - they seem a bit better in suggesting numerical range or a change-of-sign. I have tried some suggestions for Milestones B.1 and B.2 to have more qualification and measurability.

**Comment #3: Making Targets more crisp.**

Suggestions are in the same spirit as those for Milestones. Targets should be made even more specific in terms of what is the focus subject, how are we delimiting the scope of the subject.

**Comment #4. Improving the broader scheme beyond GBF to increase accountability and attributability of each country towards the GBF vision and goals.**

I had mentioned during the first workshop in January, that there could be pieces of progress in the UNFCCC regime that may be useful for CBD. I've played with this thought - trying out mirroring the two: please see the table below. I wouldn't be surprised if there are already similar thinking and efforts - and it would be great if we can learn about such efforts and consider supporting them.

<b>Climate change, UNFCCC, IPCC</b>	<b>Biodiversity, CBD, IPBES</b>
<b>IPCC-set methodologies</b> for GHG accounting	<b>IPBES-set methodologies</b> for Nature and Ecosystem Services accounting (non-existent)

<p><b>UNFCCC NDC</b> for Signatories to report on GHG accounting (following IPCC methods) <u>to keep global warming capped to 1.5degree compared to pre-industrial level.</u></p>	<p><b>CBD NDC</b> for Signatories to report on Nature-E.S. accounting (following IPBES methods) <u>to reduce extinction rate down to 10% compared to XXXX-level.</u></p> <p>Or -- take the increase in extinction rate:</p> <p><b>CBD NDC</b> ...<u>to keep the increase in extinction rate capped to 0*</u> (or make and keep negative).</p> <p><i>*This is more concrete goal, but this goal is merely a 2030-milestone.</i></p>
<p>Effectively, this move would be an upgrade of NBSAP by adopting GBF targets and IPBES-set methodologies to present (numerical) value-based targets. Such an “NDC” would equip the countries to communicate their plans, targets, and values using commonly recognizable terms[1].</p> <p>This move would enhance the current use of NBSAPs - which often merely provides justification for an action (including mobilizing financial/technical support), towards the use of NDCs that can better seek accountability/attribution to an action to deliver outcomes.</p>	
<p><b>Paris Agreement Architecture &amp; Rulebook</b> for Signatories reporting on NDCs for name-and-acclaim/shame (esp. on the protocols of reporting and peer reviewing of NDCs, while balancing</p>	<p><b>Kunming Agreement(?) architecture and rulebook</b> for Signatories reporting on NDCs for name-and-acclaim/shame.</p>

sovereignty and transparency).

[1] I am being careful with word choices because I want to avoid implying that biodiversity and nature values can be neatly subscribed to a set of universal terms. In my view that's neither simple nor desirable - the diversity of values and views is worthy of recognition and celebration. But insomuch as globalization based on monetary currency has reached into our diverse value systems, I see the need for some level of common language and 'currency' representing nature and biodiversity values, in order to stand in the face of money value.

## Specified comments and feedback from the workshops on the Global Biodiversity Framework's goals and targets

Global Biodiversity Framework	UCCLAN's Suggestions	Remarks/Concerns UCCLAN giving during the workshops
<b>Goals and Milestones</b>		
Find documents: <a href="https://www.cbd.int/conferences/geneva-2022/wg2020-03/documents">https://www.cbd.int/conferences/geneva-2022/wg2020-03/documents</a> GBF: <a href="https://www.cbd.int/doc/c/0037/8045/a67574c3f7452fd6bb56c058/wg2020-03-03-en.docx">https://www.cbd.int/doc/c/0037/8045/a67574c3f7452fd6bb56c058/wg2020-03-03-en.docx</a>		
<b>Goal A.</b> The integrity of all ecosystems is enhanced, with an increase of at least 15 per cent in the area, connectivity		<b>Please fill in here if you noticed any comments or feedback from the</b>

<p>and integrity of natural ecosystems, supporting healthy and resilient populations of all species, the rate of extinctions has been reduced at least tenfold, and the risk of species extinctions across all taxonomic and functional groups, is halved, and genetic diversity of wild and domesticated species is safeguarded, with at least 90 per cent of genetic diversity within all species maintained.</p>		<p><b>workshop on this goal</b></p>
<p><b>Milestone A.1</b> Net gain in the area, connectivity and integrity of natural systems of at least 5 per cent.</p>		<p><b>{enter name} ...</b></p>
<p><b>Milestone A.2</b> The increase in the extinction rate is halted or reversed, and the extinction risk is reduced by at least 10 per cent, with a decrease in the proportion of species that are threatened, and the abundance and distribution of populations of species is enhanced or at least maintained.</p>		
<p><b>Milestone A.3</b></p>		<p><b>{enter name} ...</b></p>

<p>Genetic diversity of wild and domesticated species is safeguarded, with an increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.</p>		
<p><b>Goal B</b> Nature’s contributions to people are valued, maintained or enhanced through conservation and sustainable use supporting the global development agenda for the benefit of all;</p>		<p>{enter name} ...</p>
<p><b>Milestone B.1</b> Nature and its contributions to people are fully accounted and inform all relevant public and private decisions.</p>	<p>UCCLAN’s suggestion for B1:</p> <p><b>[HUMAN WELL-BEING AND HEALTHY NATURAL SYSTEMS (ECOSYSTEMS AND BIODIVERSITY)]</b> are fully <del>Nature and its contributions to people are fully</del> accounted and inform all relevant public and private decisions <b>[AND INVESTMENTS]</b>.</p> <p>Rational:</p> <ul style="list-style-type: none"> <li>• We warn against valuing nature solely on its ‘contribution to people’ as we feel this will under-estimate the diversity of values nature has. Safeguards must be put in place as to how nature is valued to ensure this term is used wisely. We also need to be aware that we do not fully understand nature’s ‘contribution to people’ at this stage. For example, links between the current global mental health crisis and our environmental crisis. Human wellbeing and healthy natural</li> </ul>	<p>- “accounting nature” is very open. What about nature are we talking about? Nature’s rights - the intrinsic values?</p> <p>- “accounting nature’s contributions to people” is very open. Which people?</p>

	<p>systems must be the cornerstone of how we measure our success.</p> <ul style="list-style-type: none"> <li>• For transformational change to occur, a pivotal step will be for investments to have included measures of impacts on human wellbeing and health of nature not only into their decision making process but also the outcomes, the flows of finances.</li> <li>• Accounting nature is not an outcome indicator, it is a process</li> </ul>	<p><b>Where to draw the boundary - which people to include and exclude?</b></p> <ul style="list-style-type: none"> <li>- “fully accounted” is vague. What will be considered being satisfactorily ‘full’ and comprehensive ?</li> <li>- “all relevant [...] decisions” is vague. Where does the ‘relevance’ begin and end? What kind of decisions?</li> <li>- With these questions in mind, below is</li> </ul>
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		<p>suggested to focus on <i>new efforts</i>:</p> <p><i>Milestone B.1. An increased number of decision-making tools and databases are operational to consider and promote decision options with positive potential impacts on <u>nature's ecological integrity</u> (or other qualification - nature's rights? nature's intrinsic value?)</i></p>
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		<p><i>and on the nature's contributions to people who are most directly benefitting.</i></p>
<p><b>Milestone B.2</b> The long-term sustainability of all categories of nature's contributions to people is ensured, with those currently in decline restored, contributing to each of the relevant Sustainable Development Goals .</p>		<ul style="list-style-type: none"> <li>- “long-term sustainability” means how long? Isn't sustainability by definition about seeing beyond the short-term?</li> <li>- “all categories of nature's contributions to people”</li> <li>- “ensured” is vague - what will be considered being</li> </ul>

		<p><b>“(adequately) ensured”?</b></p> <ul style="list-style-type: none"><li>- “[nature’s contributions] currently in decline restored”: perhaps syntax - but I question - isn’t it that what needs to be restored is not the nature’s <i>contribution</i> but rather nature’s <i>ability to contribute</i> to people?</li><li>- If I understand correctly, the Milestone is saying, a “nature’s contribution to people” should</li></ul>
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		<p>be contributing to its “relevant SDGs” (ex. nature contributing food à contribute to the SDG on food security).</p> <p>- Similar to Milestone B.1 suggestion, perhaps more measurable is how much of new efforts have been made effective; or the Milestone could more explicitly hinge on the SDG/targets’ progress. Among the two suggestions</p>
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		<p>below, “B” has the advantage of direct linking to established targets - hence not adding on the to-do-list but combining efforts.</p> <p><i>Milestone B.2 (Suggestion A): An increased number of all types of nature’s contributions to people - current or historical - are recorded, based on which plans to sustain, revive, or enhance the contributions</i></p>
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		<p><i>are being implemented.</i></p> <p><i>Milestone B.2 (Suggestion B): All identified SDG targets that have direct attributable contribution from nature indicate positive progress.</i></p>
<p><b>Goal C</b> The benefits from the utilization of genetic resources are shared fairly and equitably, with a substantial increase in both monetary and non-monetary benefits shared, including for the conservation and sustainable use of biodiversity.</p>		{enter name} ...
<b>Milestone C.1</b>		{enter name} ...

<p>The share of monetary benefits received by providers, including holders of traditional knowledge, has increased.</p>		
<p><b>Milestone C.2</b> Non-monetary benefits, such as the participation of providers, including holders of traditional knowledge, in research and development, has increased.</p>		<p>{enter name} ...</p>
<p><b>Goal D</b> The gap between available financial and other means of implementation, and those necessary to achieve the 2050 Vision, is closed.</p>		<p>{enter name} ...</p>
<p><b>Milestone D.1</b> Adequate financial resources to implement the framework are available and deployed, progressively closing the financing gap up to at least US \$700 billion per year by 2030.</p>		<p>{enter name} ...</p>
<p><b>Milestone D.2</b> Adequate other means, including capacity-building and development, technical and scientific cooperation and technology transfer to implement the framework to 2030 are available and deployed.</p>		<p>{enter name} ...</p>

<p><b>Milestone D.3</b> Adequate financial and other resources for the period 2030 to 2040 are planned or committed by 2030.</p>		{enter name} ...
<b>Action Targets 1 - 21 for 2030</b>		
Reducing threats to biodiversity		
<p><b>Target 1.</b> Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.</p>	<p>UCCLAN’s Suggestion Target 1:</p> <p>Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial Planning, <b>INCLUDING ALL AREAS UNDER AGRICULTURE, AQUACULTURE AND FORESTRY, ENSURING THESE ARE MANAGED SUSTAINABLY AND UNDER A RIGHTS-BASED APPROACH</b> , addressing land- and sea-use change, retaining existing intact and wilderness areas</p> <p style="background-color: yellow;">maintain and enhance resilience of ecosystems to address Climate change mitigation and adaptation.</p>	{enter name} ...
<p><b>Target 2.</b> Ensure that at least 20 per cent of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems.</p>	<p>UCCLAN’s Suggestion Target 2:</p> <p>Protection and restoration?</p> <p>and additionally restore and protect biodiversity in urban areas. Maintaining and enhancing urban nature.</p> <p>Ensure that at least 20 percent of degraded freshwater, marine and terrestrial ecosystems are under restoration, maintaining and enhancing connectivity among them.</p>	{enter name} ...
<p><b>Target 3.</b> Ensure that at least 30 per cent globally of land areas</p>	<p>UCCLAN’s Suggestion Target 3:</p>	{enter name} ...

<p>and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.</p>	<p>Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively, <b>ADEQUATELY FUNDED, SUPPORTED AND</b> equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.</p>	
<p><b>Target 4.</b> Ensure active management actions to enable the recovery and conservation of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict.</p>		<p><b>{enter name} ...</b></p>
<p><b>Target 5.</b> Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.</p> <p><b>Target 9.</b> Ensure benefits, including nutrition, food security,</p>	<p>UCCLAN propose merging Target 5 and 9 and suggests the following text that combines the targets with additional words in capitals:</p> <p>Ensure that <b>EXPLOITATION</b> [harvest], trade and use of wild terrestrial, freshwater and marine species is <b>PRECAUTIONARY</b>, sustainable, legal and safe for human health, as well as protects customary sustainable use by indigenous peoples and local communities, ensuring benefits, including nutrition, food security, medicines, <b>AVOIDING SPREAD OF</b></p>	<p><b>{enter name} ...</b></p>

<p>medicines, and livelihoods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities.</p>	<p><b>ZOONOTIC DISEASES</b>, and ensuring livelihoods for people especially for the most vulnerable</p> <p>Ensure benefits derived from natural resources (harvest, use, trade) are shared only if additional, i.e. after meeting ecological needs for maintaining healthy biodiversity and ecosystems and the needs of the local community for nutrition, food security, medicine &amp; livelihood.</p>	
<p><b>Target 6.</b> Manage pathways for the introduction of invasive alien species, preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate invasive alien species to eliminate or reduce their impacts, focusing on priority species and priority sites.</p>	<p>UCCLAN’ suggestion to Target 6:</p> <p>Manage pathways for the introduction of invasive alien species, preventing, or reducing their rate of introduction and establishment by at least 50 per cent, and control or eradicate invasive alien species to eliminate or reduce their impacts, focusing on priority species and priority sites. <b>WHILST TRACKING AND ADDRESSING SPECIES RANGE SHIFTS DUE TO CLIMATE CHANGE.</b></p>	<p>{enter name} ...</p>
<p><b>Target 7.</b> Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.</p>	<p>UCCLAN’s suggestion Target 7.</p> <p><b>HALT BY AT LEAST 75% ALL NEW</b> pollution from all sources, and reduce <b>BY AT LEAST 50% HISTORICAL</b> pollution <b>REMAINING</b> to levels that are <b>SCIENTIFICALLY VERIFIED</b> as not harmful to biodiversity, ecosystem functions, and human health, <b>USING THE PRECAUTIONARY PRINCIPLE.</b></p>	<p>{enter name} ...</p>

<p><b>Target 8.</b> Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.</p> <p><b>Target 11.</b> Maintain and enhance nature’s contributions to regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people.</p>	<p>UCCLAN suggests merging target 8 and 11 as there is much overlap in their functions. Both targets seem to apply using biodiversity and nature’s contributions to tackling either climate change or to regulate other very interconnected systems. All of which will be increasingly influenced by climate change as a dysregulation and break down of the earth systems.</p> <p><b>ENHANCING THE ADAPTIVE CAPACITY OF BIODIVERSITY, MINIMISE AND MITIGATE</b> climate change impactS by <b>RESTORING RESILIENCE AND CONNECTIVITY OF BIODIVERSITY USING</b> the ecosystem-based approach <b>THAT FACILITATES ATMOSPHERIC REGULATION OF GREENHOUSE GASSES, AS WELL AS HEALTHY OCEANS, SOIL, AIR, AND FRESHWATER QUALITY AND QUANTITY, AND PROVIDES CO-BENEFITS TO PEOPLE, WHILST</b> ensuring that all mitigation and adaptation efforts avoid negative impacts on biodiversity.</p> <p>Invest in ecosystem-based approaches to maintain and enhance nature’s contribution to climate change mitigation and adaptation by a minimum of 10GtCO<sub>2</sub>e/yr.</p> <p>Redundant - integrate with target 1.</p>	<p>{enter name} ...</p> <p>need to link to ToC - and unpack components</p> <p>need to simplify</p> <p>restoring nature - the outcome of these activities should feed into adaptation and mitigation</p>
<p>Meeting people’s needs through sustainable use and benefit-sharing</p>		
<p><b>Target 9.</b> Emods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities.</p>	<p>UCCLAN propose merging Target 5 and 9 and suggests the following text that combines the targets with additional words in capitals:</p> <p>Ensure that <b>EXPLOITATION</b> [harvest], trade and use of wild terrestrial, freshwater and marine species is <b>PRECAUTIONARY</b>, sustainable, legal and safe for human health, as well as protects customary sustainable use by indigenous peoples and local communities, ensuring benefits, including nutrition, food security, medicines, <b>AVOIDING SPREAD OF ZOO NOTIC DISEASES</b>, and ensuring livelihoods for people especially for the most vulnerable</p>	<p>{enter name} ...</p>

<p><b>Target 10.</b> Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.</p>	<p>UCCLAN’s suggestion to Target 10.</p> <p>Ensure all areas under agriculture, aquaculture and forestry DO NOT COMPROMISE THE INTEGRITY AND CONNECTIVITY OF IMPORTANT BIODIVERSITY AREAS AND are managed sustainably, in particular ENSURING [through] the conservation and sustainable use of biodiversity, increasing the [productivity and] resilience of these production systems.</p>	<p>{enter name} ...</p>
<p><b>Target 11.</b> Maintain and enhance nature’s contributions to regulation of air quality, quality and quantity of water, and protection from hazards and extreme events for all people.</p> <p><b>Target 8.</b> Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.</p>	<p>UCCLAN suggests merging target 8 and 11 as there is much overlap in their functions. Both targets seem to apply using biodiversity and nature’s contributions to tackling either climate change or to regulate other very interconnected systems. All of which will be increasingly influenced by climate change as a dysregulation and break down of the earth systems.</p> <p><b>ENHANCING THE ADAPTIVE CAPACITY OF BIODIVERSITY, MINIMISE AND MITIGATE</b> climate change impactS by <b>RESTORING RESILIENCE AND CONNECTIVITY OF BIODIVERSITY USING</b> the ecosystem-based approach <b>THAT FACILITATES ATMOSPHERIC REGULATION OF GREENHOUSE GASSES, AS WELL AS HEALTHY OCEANS, SOIL, AIR, AND FRESHWATER QUALITY AND QUANTITY, AND PROVIDES CO-BENEFITS TO PEOPLE, WHILST</b> ensuring that all mitigation and adaptation efforts avoid negative impacts on biodiversity.</p>	<p>{enter name} ...</p>
<p><b>Target 12.</b> Increase the area of, access to, and benefits from</p>	<p><a href="#">Restoration and Protect</a></p>	<p>{enter name} ...</p>

<p>green and blue spaces, for human health and well-being in urban areas and other densely populated areas.</p>	<p>Human benefit becomes indicators/outcomes.</p> <p>Merge with target 2? Noa: Should we have a new target for access to green and blue spaces?</p>	
<p><b>Target 13.</b> Implement measures at global level and in all countries to facilitate access to genetic resources and to ensure the fair and equitable sharing of benefits arising from the use of genetic resources, and as relevant, of associated traditional knowledge, including through mutually agreed terms and prior and informed consent.</p>	<p>Noa: Should we have a new target for access to green and blue spaces and genetic biodiversity access to all aspects of biodiversity ensure the fair and equitable use and sharing of benefits</p> <p>New target on access to be included under root causes.</p>	<p>{enter name} ...</p>
<p>Tools and solutions for implementation and mainstreaming</p>		
<p><b>Target 14.</b> Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.</p>	<p>No text suggestion, but some thoughts:</p> <p>Mainstreaming biodiversity is an incredibly important objective. However, we are concerned by how the term ‘values’ can be interpreted differently by different people and can be presented differently to justify different objectives. We therefore strongly urge that parties also fully integrate limits to biodiversity loss, planetary boundaries, and existence rights alongside biodiversity values into this target. The term biodiversity values also carry a large cost in the process of valuation that many countries will not have the capacity to carry out fully and effectively. Integrating limits to biodiversity, planetary boundaries, rights to existence does not carry the same implementation costs and time requirements, and can therefore be implemented faster, reaching positive outcomes faster and making this target more inclusive for more countries to be able to engage</p>	<ul style="list-style-type: none"> <li>- “fully integrate biodiversity values” is vague. How does one do that? What and which biodiversity values? When is something “full”?</li> <li>- “[to integrate into all those government levels for all economic sectors]” - is good for being</li> </ul>

	<p>with immediately. This target suits countries with high technical and financial capacity to achieve it, however in remaining countries, most notably those with high remaining biodiversity, we are concerned that a lot of effort and time will go into valuation to prepare to achieve this target whilst the biodiversity it aims to protect is lost. Time is running out.</p> <p>Recommendation to add an indicator: By 2026, develop a global alternative measure for wealth that is inclusive to biodiversity and good quality of life, instituting the measure by 2030.</p>	<p>all-encompassing, but bad being too formidable and lacking priority.</p> <p>- “[ensuring all activities and financial flows] aligned with biodiversity values” - sounds almost didactic without any hint of guidance where to start or what to prioritize (i.e., what would that even look like, to have all activities and financial flows “aligned with BD values”?).</p> <p><i>Target 14. National and subnational development vision, strategies, plans, public expenditures, and their respective</i></p>
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		<p><i>monitoring reports demonstrate increased ambitions for and sectoral integration of the goals for biodiversity conservation and sustainable use.</i></p> <p>- With the above suggestion, the target can put spotlight on the multi-sector development strategies and plans handled by the central and local administrations. By default, the development strategies/plans will guide sector plans and policies. Furthermore, including public expenditure in the list would cover</p>
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		<p>the financial flows in the public domain.</p>
<p><b>Target 15.</b> All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal</p>	<p><b>UCCLAN</b> proposes merging targets 15 &amp; 16 and suggest following text:</p> <p>All businesses <b>AND FINANCIAL INSTITUTIONS</b> (public and private, large, medium and small) <b>MOVE TO</b> fully sustainable extraction and production practices, <b>INCLUDING THROUGH A CIRCULAR ECONOMY</b>, enabling all people everywhere to make responsible and sustainable choices taking into account cultural preferences <b>AND SOCIO-ECONOMIC SITUATIONS.”</b></p>	<ul style="list-style-type: none"> <li>- Assessing dependencies and impacts on <i>biodiversity</i> is asking for an assessment of relationships that are in most cases indirect.</li> <li>- The concept of lifecycle could be used for capturing the comprehensive scope of one’s impact.</li> <li>- “All” can lead to none. The target could set some qualification, such as ‘legal entities with annual expenditure above x% of the national</li> </ul>

		<p>GDP'. See Suggestion A.</p> <ul style="list-style-type: none"> <li>- One option could be to put the focus on the financing sector. After all, non-businesses also rely on financiers, and there's history of improving the financing sector globally to apply the mitigation hierarchy (Equator Principles). While these efforts are imperfect, a GBF Target to put the spotlight on them could make them more meaningful. See Suggestion B.</li> </ul> <p><i>Target 15. (Suggestion A): Legal entities (with annual expenditure above</i></p>
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		<p><i>X% of the national GDP) integrate into their financial reporting the natural capital accounting and the lifecycle assessments of their activities, towards decoupling the natural capital reliance from financial gains, reducing negative impacts, and increasing positive impacts</i></p> <p><i>Target 15. (Suggestion B): Public and commercial financing institutions require reporting of natural capital accounting and lifecycle assessments of</i></p>
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		<p><i>their lending and investments.</i></p> <ul style="list-style-type: none"> <li>- “Natural capital accounting” and the “lifecycle assessments” are methodologies that should be standardized by IPBES, then adopted by the Signatories. The int’l community should support the development and the uptake of such standard methods (I believe there are already such efforts).</li> </ul>
<p><b>Target 16.</b> Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the</p>		<ul style="list-style-type: none"> <li>- “people are encouraged and enabled” - how to measure that?</li> <li>- If this target is about the consumers and</li> </ul>

<p>waste and, where relevant the overconsumption, of food and other materials.</p>		<p>end users (i.e., the non-specific wider public, rather than the producers and industries) - why not include increasing their awareness and demand for nature-conserving products and services?</p> <p><i>Target 16. Regular channels for providing data and information is increased to raise public awareness on optimizing consumption of food and materials, reducing waste, and making informed choices about products and services.</i></p>
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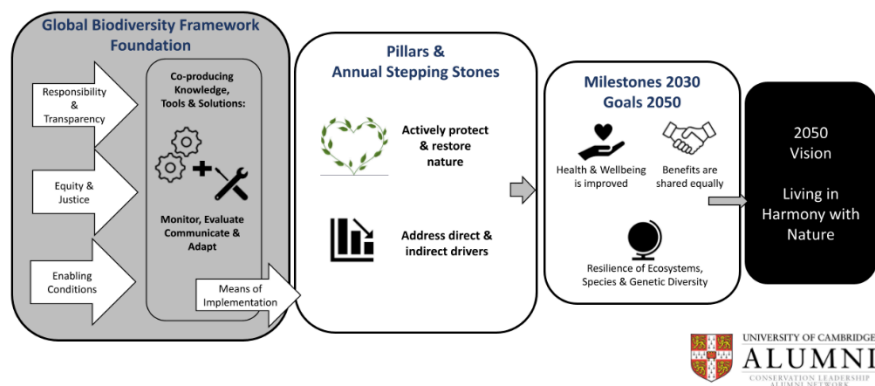
<p><b>Target 17.</b> Establish, strengthen capacity for, and implement measures in all countries to prevent, manage or control potential adverse impacts of biotechnology on biodiversity and human health, reducing the risk of these impacts.</p>		
<p><b>Target 18.</b> Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.</p>	<p>UCCLAN’s suggestion Target 18.</p> <p>Redirect, <del>repurpose, reform</del> or eliminate <b>subsidies and all other incentives harmful for biodiversity, in a just and equitable way, prioritising the most harmful and ensuring that all harmful subsidies are redirected or eliminated by 2026 and that all harmful incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity by 2030.</b></p>	<p><b>{enter name} ...</b></p>
<p><b>Target 19.</b> Increase financial resources from all sources to at least US\$ 200 billion per year, including new, additional and effective financial resources, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private</p>	<p>UCCLAN’s suggestion on Target 19.</p> <p>Increase financial resources from all sources to at least US\$ 200 billion per year [<b>globally</b>], including new, additional, and effective financial resources, to meet the needs for implementation [<b>of the Global Biodiversity Framework</b>], <del>commensurate with the ambition of the goals and targets of the framework.</del> Including increasing by at least US\$ 10 [<b>&gt;10</b>] billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, <b>annually increase disincentives for</b></p>	<p><b>{enter name} ...</b></p>

<p>finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.</p>	<p><b>practices harmful to biodiversity</b>, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, <del>to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.</del></p>	
<p><b>Target 20.</b> Ensure that relevant knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, guides decision-making for the effective management of biodiversity, enabling monitoring, and by promoting awareness, education and research.</p>	<p>UCCLAN’s suggestion target 20.</p> <p>Ensure that relevant knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, guides decision-making for the effective management of biodiversity, enabling monitoring, and by promoting awareness, education, and research. <b>[In addition, ensure engagement of local communities and indigenous people in efforts for knowledge production and co-production of projects and programmes and provide financial and capacity-building support to enable developments, engagement, and leadership in long term interventions.]</b></p>	<p><b>{enter name} ...</b></p>
<p><b>Target 21.</b> Ensure equitable and effective participation in decision-making related to biodiversity by indigenous peoples and local communities, and respect their</p>	<p>UCCLAN’s suggestion target 21.</p> <p>Ensure equitable, <del>and effective</del><b>[, early and ongoing]</b> participation in decision-making; <b>[and implementation of action plans and interventions]</b> related to biodiversity by indigenous peoples and local communities, and respect their rights over lands, territories and resources, as well as by women and girls, and youth.</p>	<p><b>{enter name} ...</b></p>

<p>rights over lands, territories and resources, as well as by women and girls, and youth.</p>		
<p><b>Theory of Change</b></p>		
<p><b>Theory of Change by the CBD Secretariat</b></p>		<p>{enter name} ...</p>
<p><b>UCCLAN's suggestions to Theory of Change</b></p>	<p>We share the position of many parties on the need to modify the Structure of the framework and Section D: Theory of Change. We suggest an alternative Theory of Change model to help visualise structural changes needed in the Global Biodiversity Framework below:</p>	

## Suggested alternative by UCCLAN to Figure 1. Global Biodiversity Framework Theory of Change

### Annex I - Suggested restructuring of the Theory of Change



The key reason for our intervention on the ToC is that we believe that in Draft One, **humans and nature are being separated in the Theory of Change**. This has led to some duplications and incoherence in targets, milestones and goals. The importance of nature as a foundation that underpins all is being lost. We recommend that parties revise the ToC and the structure of the targets to two major pillars:

1. Effectively protecting and restoring nature
2. Addressing direct and indirect drivers of the loss of biodiversity and ecosystem health.

As part of this model we suggest to create a flow where 'Nature's contribution to people', a part of the goals, is stemming directly from the successful achievement of the Global Biodiversity Framework targets through biodiversity protection and sustainable

	<p><b>use, and not as two separate pathways, as depicted in the current Theory of Change.</b> This will help highlight that nature’s contribution to people will only be accomplished as a result of proper implementation of the biodiversity targets, as well as reduce the risk of counterproductive trade-offs that might unwittingly occur if these two pathways remain separate.</p> <p><b>The proposed new structure helps to prioritise the need to fully address the indirect drivers, the root causes, of biodiversity loss, within the theory of change such as</b> the current economic system that encourages continuous growth based on GDP rather than measures of human wellbeing and health of nature. <b>A truly green recovery from COVID-19 means moving towards an alternative economic system moving beyond GDP,</b> also by incorporating planetary boundaries. We promote using existing initiatives and solutions such as the Doughnut Economics Model as a target or headline indicator. By explicitly addressing this indirect driver, and not only taking account of nature through biodiversity accounting, the GBF would better fulfill its aims, specifically article 14.b of the convention.</p> <p><b>The proposed new structure helps ensure the urgency of the biodiversity crisis is better reflected in the targets.</b> The ‘action targets’ can be broken down into a checklist of key global annual stepping stones, so that we make faster, more transparent progress and do not find ourselves in the same position in a decade.</p> <p>The proposed new structure suggests that <b>a core set of foundations necessary for achieving a successful Global Biodiversity Framework are fully acknowledged, addressed and raised in their importance, in line with paragraph 7 and 8 of section D.</b> For example, enabling</p>	
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	<p>conditions for the framework such as target 20 on producing knowledge and 21 on participation should be structured as enabling elements or core principles as suggested by Namibia, applied for all targets, as relevant. These will form part of a core set of foundations for achieving a successful Global Biodiversity Framework as outlined in our alternative Theory of change.</p>	
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