

**Views of The Nature Conservancy**  
on the  
**First Draft of the Global Biodiversity Framework**  
August 2021

The Nature Conservancy (TNC) welcomes the [First Draft of the Global Biodiversity Framework](#) (GBF) released on 12 July 2021 and considers it an improvement over the Zero Draft. Specific areas of progress in the First Draft text include:

- Improvement in specificity and components for Target 3 (**area-based conservation measures-ABCMs**), including on the issue of **representativeness** of conserved areas.
- Inclusion of a target specifically dedicated to **restoration** (Target 2).
- Enhanced language supporting **IPLC engagement** in Targets 9 (sustainable management), 13 (Traditional Knowledge in ABS), 20 (Traditional Knowledge/FPIC in education and research), and 21 (participation).
- Added focus on closing the **financial gap by 2050 and mobilizing US \$700 billion per year by 2030** to close the gap (Goal D). If fully implemented, **together with the mainstreaming agenda, Resource mobilization** Target 19, which includes a doubling of ODA and mobilization of additional domestic resources, and Target 18 on redirecting subsidies, would together close the biodiversity finance gap if the \$200 billion is truly additional.
- Inclusion of clear **natural climate solutions** (mitigation) target at 10 GtCO<sub>2</sub>e per year, a figure that has been supported by TNC research.

Summary of Key areas for further work in the Draft 1 text:

- The mission statement is insufficiently ambitious. It should include a goal of **nature positive** by 2030, meaning **halting and reversing nature loss** measured from a baseline of 2020, through increasing the health, abundance, and resilience of species, populations and ecosystems and sustaining the diversity of species and ecosystems so that **by 2030** nature is visibly and measurably on the path of recovery.
- The First Draft is still not transformational in terms of addressing the main **drivers** of biodiversity loss; the action targets need to explicitly **address risks from infrastructure, agriculture and other production sectors** that are driving conversion, degradation and loss. Target 1 (spatial planning) should explicitly address driver sectors as being subject to these plans.
- Target 14 on mainstreaming and aligning financial flows needs to spell out much more concrete and specific action targets to transform key sectors that are driving biodiversity loss, especially agriculture, infrastructure and finance.
- The proposed approach to global target setting, conservation planning and tracking area-based conservation focuses on “land and sea areas,” and is insufficient for securing and improving freshwater biodiversity and ecosystem function. To meet the 2030 and

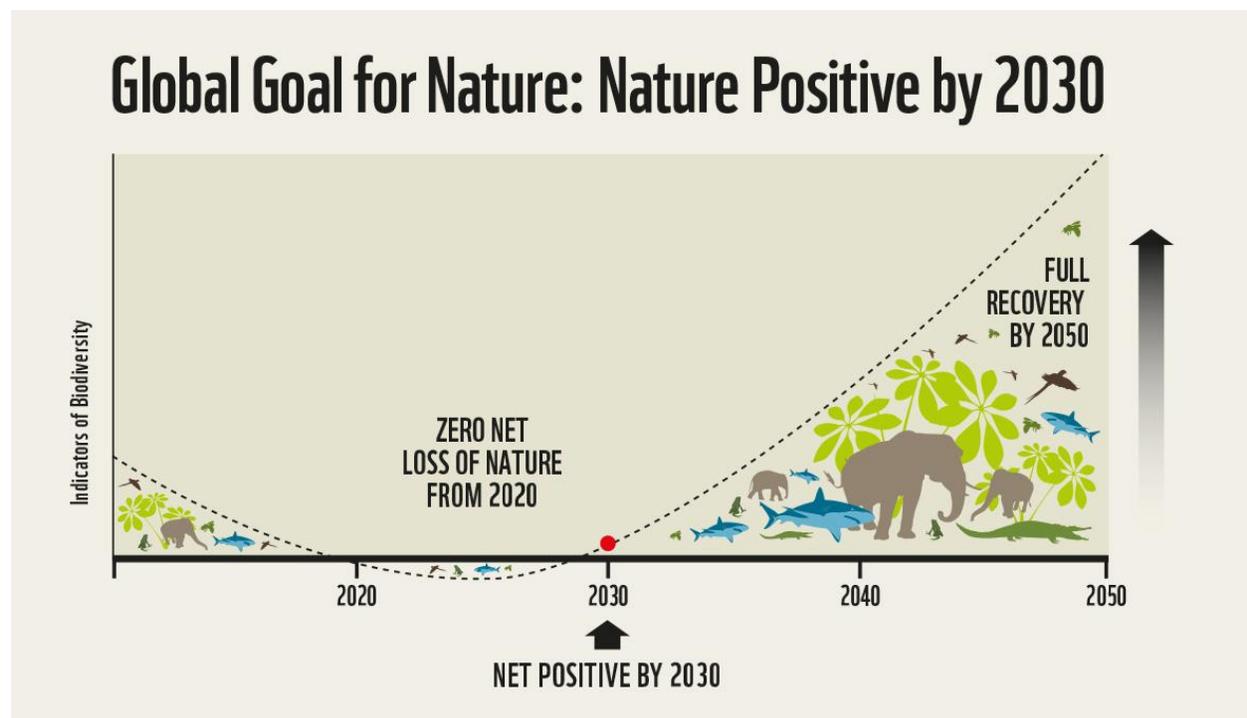
2050 Goals, we strongly recommend revisions to the targets and indicators to explicitly include **freshwater ecosystems, biodiversity and their unique needs**.

- **Implementation mechanisms** are not included in the First Draft; the cover note suggests that they would be part of a separate COP decision. Given the importance of implementation mechanisms to the success of the framework, Parties must be able to agree on implementation in tandem with the GBF.
  - **National Biodiversity Finance Plans** should be a requirement for all countries; this mechanism is critical to attainment of the Resource Mobilization targets in the GBF and costs for developing them should be covered by the GEF for all GEF-eligible countries.
- Similarly, the **monitoring framework** is still incomplete, and the Headline Indicators draft ([WG2020-03-03.add1](#)) has significant gaps, notably on freshwater/riverine ecosystem components.

## Section by Section Recommendations

### Mission

The GBF should have as its mission to halt and reverse nature loss so that we are **nature positive by 2030**. This mission was illustrated by a figure that was included in the SBSTTA-24 document on scientific and technical information (SBSTTA-24-03-add2. Rev1) and is reproduced in a modified fashion below. The First Draft mission is insufficiently ambitious, too wordy, and difficult to remember.



#### GOAL A:

The Goal's proposed "15 per cent increase in the area and integrity of natural ecosystems by 2050" is likely insufficient to achieve the 2050 Vision of living in harmony with nature. We recommend a goal of at least 25 per cent.

The baseline for Milestone A.1, "Net gain in the area, connectivity and integrity of natural systems" should be correspondingly increased to 10 per cent (by 2030), and a baseline year of 2020 should be established in the text of the milestone.

#### GOAL B:

While the goal and milestones are appropriate, they will be difficult to measure and aggregate at different scales. The UN System of Environmental Economic Accounting proposed in the Headline Indicators document (WG2020-03-03-add1) will need to be supplemented by other indicators and methodologies to assess progress toward these milestones.

#### GOAL C:

The restriction of benefit sharing to genetic resources (and associated TK) has not ensured benefits envisaged under the Nagoya Protocol. Goal C should therefore include "associated traditional knowledge" and "derivatives" to ensure ABS is not fundamentally undermined.

Proposed text, Goal C:

*The benefits from the utilization of genetic resources, **derivatives and associated traditional knowledge**, 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.*

Further, the milestones C.1 and C.2 should be revised to reflect two key concerns by IP & LCs:

- Some holders of TK have not come by TK legitimately, e.g., there are some repositories that have not applied FPIC, so the language in both milestones should be oriented specifically toward **IPs and LC's holding such traditional knowledge**.
- The participation of [TK] providers including IPs & LCs should be a given whenever their knowledge is being accessed. The most important non-monetary benefit is in fact not merely their participation, but the *protection, preservation and maintenance of traditional knowledge* in accordance with Article 8(j) of the Convention. This should be through mutually agreed terms and guided by community protocols, based on language in the Nagoya Protocol.

Proposed Text, Milestone C. 1:

*The share of monetary benefits received by providers, including **indigenous peoples and local communities holding traditional knowledge** has increased.*

Proposed text, Milestone C.2:

*Non-monetary benefits— such as research, development, preservation and maintenance of traditional knowledge—have increased through the participation of indigenous peoples and local communities holding such knowledge, and based on mutually agreed terms and bio-cultural community protocols.*

#### GOAL D:

TNC appreciates that this goal is consistent with the findings and recommendations of our *Financing Nature* report. In particular, we welcome framing the goal in terms of closing the \$700 billion annual gap by 2030, thus **requiring actions to both raise new funding as well as reduce or repurpose harmful spending** in multiple sectors, esp. agriculture.

#### Target 1:

This target has been improved in clarity from the Zero Draft version, but by retaining a focus on spatial planning rather than the purpose of the spatial planning, it obfuscates its intent and emphasizes the process, not the outcomes. Spatial planning must be aimed at retaining irreplaceable biodiversity areas, including intact, high-quality habitats and those places which support the persistence of life on earth. Preventing **degradation and conversion of these areas and avoiding and mitigating negative impacts** from industries and other drivers of change should be an objective of integrated spatial plans. Only then can Target 1 contribute to Goal A/Milestone A.1.

We also strongly recommend revisions to the target to **explicitly include freshwater ecosystems** and their unique needs. The standing assumption that terrestrial planning and protected areas will meet the needs of freshwater biodiversity and ecosystems has been refuted at the global, regional and local scales.<sup>1</sup> For example, in places where terrestrial protected areas do currently provide some benefit to freshwater biodiversity, this protection often lacks durability, as evidenced by the globally widespread development of dams inside protected areas.

Proposed revised text for Target 1:

*Ensure that all land, freshwater and sea areas globally are **subject to** integrated biodiversity-inclusive spatial plans and integrated management aimed at retaining existing intact and wilderness areas, and ensuring the persistence of biodiversity through **minimizing the impact from infrastructure and other sectors responsible for land-freshwater-and sea-use change.***

#### Target 2: Restoration

TNC strongly supports the addition of a separate target on **restoration. We believe it will be necessary to have begun restoring over 30 per cent (as opposed to 20 per cent) of degraded** ecosystems by 2030 to make sufficient progress toward the milestone.

### Target 3: Area-Based Conservation Measures

TNC strongly supports the component elements added to the area-based measures target in the First Draft. Specifically, we support “**ecologically representative**” remaining in the target language to complement “areas of importance for biodiversity” as an essential way to ensure all biodiversity persists. We have worked to improve measurement of ecological representation of conserved areas through the Representation Achievement Score, which will be calculated for all countries of the world with each update of the EU’s Digital Observatory on Protected Areas (DOPA), helping us better quantitatively assess how area-based measures are improving ecological representation globally.

We also recommend that **freshwater** be explicitly called out in the target (proposed revised text, “30 per cent globally of land, **freshwater**, and sea areas”). Freshwater ecosystems are some of the most threatened and under-protected ecosystems, and further, are often transboundary—which presents unique management challenges. Freshwater systems are not currently being measured in our assessments of protected and effectively managed areas [see also Target 1 discussion above].

Further, given the importance of **indigenous and community-managed areas** to achieving this target, TNC believes the target should include qualifying language that it be pursued *with the free prior and informed consent of indigenous peoples and local communities, and including through appropriate recognition and support for the collective lands, territories and resources of indigenous peoples and local communities.*

### Target 4: Species

TNC supports the target.

### Target 5: Wildlife use and trade

TNC supports the target.

### Target 6: Invasive Alien Species

TNC does not currently have a position on this target.

### Target 7: Pollution

TNC supports the strong targets on nutrients, pesticides and elimination of plastic waste. However, we note that volume-based targets for pesticide reduction do not account for the wide variation in toxicity and impacts of different kinds of pesticides and could therefore have perverse effects. It would be preferable to express targets (and indicators) in terms of impacts on environmental and human health<sup>1</sup>. If it is not possible to develop such indicators in the short

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<sup>1</sup> For example, the Environmental Impact [of Pesticides] Quotient (EIQ). See: Kovach, J., Petzoldt, C., Degni, J., and Tette, J. 1992. A method to measure the environmental impact of pesticides. New York’s Food and Life Sciences Bulletin 139:1–8.

term, a volume reduction target/indicator per area of farmland might be more suitable than a focus on gross reduction of pesticides by volume.

In general regarding agricultural pollutants, the GBF should emphasize incentives for land and product stewardship measures to improve the responsible use of nutrients and pesticides through implementation of regenerative agriculture techniques in Target 10.

### **Target 8: Climate**

The target now includes a clear objective of contributing at least 10 **Gt CO<sub>2</sub> per year** to global climate mitigation, which is supported by TNC research.<sup>ii</sup> It now focuses on **avoiding** negative impacts on biodiversity (from “minimizing” in the Zero Draft).

The use of the term “nature-based solutions” (NBS) has been removed from the text in favor of “ecosystem-based approaches,” which has long-standing use under the Convention. TNC acknowledges the contributions ecosystem-based approaches have for nature and people; however, we support the reintegration of the NBS concept as a broader umbrella term that fully covers all possible nature-based solutions and has been defined by IUCN in a way that includes appropriate biodiversity safeguards. Including the NBS concept throughout the GBF will improve the integration of a broader range of solutions across the multilateral environmental conventions, especially the UNFCCC. To avoid confusion of the different terms we recommend the CBD clarify the different concepts and provide examples of its application in a decision linked to the GBF.

### **Target 9: Sustainable management of wild species**

TNC appreciates the focus in this target on protecting **customary sustainable use by indigenous peoples and local communities**.

### **Target 10: Sustainable natural resource management**

This target on agriculture, aquaculture and forestry is improved by its focus on **increasing the productivity and resilience of production systems** and doing so through biodiversity conservation. TNC recommends inclusion of the concept of **regenerative agriculture** in this target, as well as consideration of inclusion of the **foodscapes** concept as an integrative framework to bring together stake holders and best practices around defined food production landscapes and seascapes.

### **Target 11: NCP – Air, water, DRR**

This target has been made more comprehensive by recognition that nature’s contributions to people are global in scope, but in removing a specific target figure (that implies specific populations have benefitted from improved nature services), the target now has new challenges for accountability and measurement.

### Target 12: Urban parks/health

TNC recommends reinstating a measurable number in this target. (The 0.5 draft suggested a 100 per cent increase in green and blue spaces in urban areas.) We propose that the target:

*Ensure that all urban dwellers are within a 15-minute walk (1.5km) of an accessible green or blue space by 2030.*

This improves the equity and human benefits of the target more than a simple increase in area.

### Target 13: Access and Benefit Sharing

TNC supports the target.

### Target 14: Mainstreaming and aligning financial flows

This is a critical target for success of the mission. If truly implemented, it could provide the necessary transformational push for the GBF. However, it encompasses so much that there is little accountability for any specific sector-based action or policy. We recommend the inclusion of **a short set of action-oriented sub-targets that specify regulatory approaches** that are necessary to integrate biodiversity at all levels of the economy, especially in the sectors of agriculture, infrastructure, and finance.

Further, Target 14 should embed the concept of the **mitigation hierarchy**, as a key tool for avoiding and compensating impacts to biodiversity. (Mainstreaming is a broad concept, and not really a tool; more specificity is needed.) The mitigation hierarchy would tie this Target more explicitly to Targets 1 and 2 on preventing degradation and loss of intact ecosystems and restoration of degraded ecosystems, and thus would contribute to the achievement of Milestone A.1 on “**net gain** in the area, connectivity and integrity of natural ecosystems...”.

Text Proposal, Target 14:

*Fully integrate biodiversity values into policies, regulations, development plans, foreign aid and investment, poverty reduction strategies, accounts, and assessments of environmental impacts, including strategic and regional environmental assessments, at all levels of government and across all sectors of the economy, **ensuring that all infrastructure, activities and financial flows follow the mitigation hierarchy and are aligned with shared goals for biodiversity.***

### Target 15: Business dependencies and impacts

TNC welcomes the inclusion of a new target directed specifically to business assessment and reporting on impacts and dependencies. We note, however, that compliance will likely require **enabling regulations** by governments.

### Target 16: Overconsumption & waste

TNC supports the target.

### Target 17: Biotechnology

TNC does not currently have a position on this target.

#### **Target 18: Harmful subsidies**

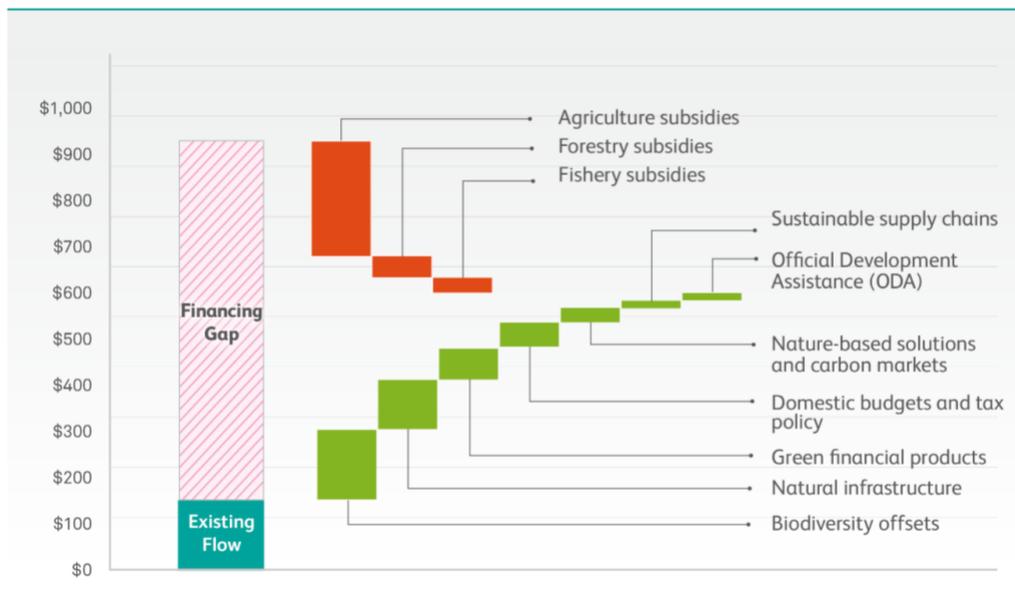
This target is improved by providing a clear reduction by at least **US\$ 500 billion per year** of harmful incentives, in a just and equitable way, including **all** the most harmful subsidies. This is consistent with the approaches recommended by TNC's report *Financing Nature* (Deutz et al. 2020)<sup>iii</sup> which indicates that the single most impactful mechanism to close the global finance gap is to repurpose the most harmful subsidies in the agriculture sector.

#### **Target 19: Financial resources**

This target on resource mobilization calls for closing the \$700B annual finance gap. That requires that financial resources should increase from **all** sources by at least **US\$ 200 billion per year** above current levels. The negotiating text calls for increasing resources **to** [a total of] \$200B per year, which would be inadequate to close the gap when paired with a \$500B reduction in harmful flows. The \$200 billion must be new and additional (see [Figure 2.](#))

TNC welcomes the call to increase international aid flows to developing countries by **US\$ 10 billion a year**, and we note that this is consistent with steps many countries are taking to align 30% of their international climate aid for nature-based solutions. The increase in funding to developing countries should focus on supporting policy reform to leverage substantial increases in private and public domestic resource mobilization.

TNC strongly recommends that the implementation mechanisms for the GBF include the requirement to **prepare National Biodiversity Finance Plans** by 2023 [see "Section H" below] and that the Global Environment Facility be directed to cover the costs of developing the plans for all GEF-eligible countries.



Estimate of growth in financing resulting from scaling up proposed mechanisms by 2030 (in 2019 US\$ billion per year)

Figure 2. from Deutz et al. 2020.

### Target 20: Knowledge, awareness, education

TNC supports the improvements to this target, particularly the strengthening of the language of indigenous peoples and local communities related to Traditional Knowledge and the importance of FPIC.

### Target 21: Equitable participation

TNC supports the improvements to this target, particularly the strengthening of the language of indigenous peoples and local communities. We suggest making deliberate reference to freshwaters: “...respect their rights over lands, **waters**, territories and resources...”.

### Section H: Implementation Mechanisms

TNC appreciates the importance of keeping the core text of the GBF as concise as possible to support its understanding and use by a wide range of institutions and stakeholders. However, implementation mechanisms are crucial to transparency and accountability – and ultimately to the success of the GBF. The GBF must be tightly linked to the implementation components, and they must be adopted in tandem.

TNC recommends that implementation mechanisms include a requirement for all countries to produce **National Biodiversity Finance Plans**; this mechanism is necessary to achieve the Resource Mobilization targets in the GBF.

Resource mobilization mechanisms should also ensure that adequate, accessible, and appropriate **finance and capacity is available for IPLCs to fully engage in implementation of all**

**aspects of the GBF**, including for territorial planning, conservation management of species and ecosystems, participation in national policy processes and resources to support restoration and nature-based climate solutions on IPLC lands.

### Section K: Outreach, awareness and uptake

We recommend a revision to this paragraph as proposed below to strengthen the link between biodiversity and human well-being as the objective of awareness and outreach:

Proposed Text, Section K:

*Outreach, awareness and uptake **and monitoring** of the post-2020 global biodiversity framework by all stakeholders is essential to effective implementation, including by:*

*(a) Increasing understanding, awareness and appreciation of the **essential function** of biodiversity **to functioning societies**, including the associated knowledge, values and approaches used by indigenous peoples and local communities.*

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<sup>i</sup> Darwall *et al.* Implications of bias in conservation research and investment for freshwater species. *Conservation Letters*, **4(6)**,474-482 (2011) ;Juffe-Bignoli *et al.* Achieving Aichi Biodiversity TARGET 11 to improve protected areas performance and conserve freshwater biodiversity. *Aquat. Conserv. Mar. Freshw. Ecosyst.* **26**, 133–151 (2016), Azavedo-Santos *et al.* Protected areas: A focus on Brazilian freshwater biodiversity. *Divers. Distrib.* **25**, 442–448 (2018), Acremen *et al.* Protected areas and freshwater biodiversity: A novel systematic review distills eight lessons for effective conservation. *Conserv. Lett.* **13**, e12684( 2019), Leal *et al* Protected areas: Integrating terrestrial-freshwater planning doubles conservation of tropical species. *Science* **370**, 117–121. (2020) ; Higgins, Jonathan, *et al.* "Durable freshwater protection: A framework for establishing and maintaining long-term protection for freshwater ecosystems and the values they sustain." *Sustainability* **13.4** (2021): 1950., Oppenman, Jeffrey J., *et al.* "Safeguarding Free-Flowing Rivers: The Global Extent of Free-Flowing Rivers in Protected Areas." *Sustainability* **13.5** (2021): 2805.

<sup>ii</sup> Griscom, B. W. *et al.* Natural climate solutions. *Proceedings of the National Academy of Sciences* **114**, 11645–11650 (2017).

<sup>iii</sup> Deutz, A. *et al.* *FINANCING NATURE: Closing the Biodiversity Finance Gap.* (2020).