

**Template for submission of scientific and technical comments on Appendix 2 of the recommendation adopted by the Subsidiary Body on Scientific, Technical and Technological Advice for the Resumed Session of its twenty-fourth meeting**

**TEMPLATE FOR COMMENTS**

| <b>Review comments on Appendix 2 of the present recommendation</b>  |   |
|---|---|
| <b>Scope of this template for comments</b>  | Template for submitting comments in accordance with recommendation CBD/SBSTTA/REC/24/2, paragraph 2, where the Executive Secretary of the Convention on Biological Diversity (CBD), under the guidance of the Bureau of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA), invites Parties, other Governments and relevant stakeholders to submit views on Appendix 2 of the recommendation. |
| <b>Contact information</b>  |   |
| <b>Party/Government/Observer</b>  | Party   |
| <b>Party/Government/Observer representative</b>   | Germany   |
| <b>Comments</b>   |   |
| Please provide any general comments on the Appendix 2.  |   |
| <p>The list of proposed indicators in Appendix 2 contains a number of so-called component indicators. Assessing the quality of such index indicators or composite indicators is often problematic. Not only, that the informative value of such an index suffers from the lack of an empirical reference value when it is introduced; moreover, different data qualities are often mixed and opposing trends and ranges of fluctuation of the sub-indicators would be difficult or - depending on the presentation - impossible to recognise. Due to possibly methodologically unavoidable weightings of the sub-indicators, the overall index could be subject to a value judgement. This would inappropriately prejudge a political assessment through the type of weighting.</p> <p>Comments on specific indicator suggestions: 3.0.1: In general, an indicator on PA governance is welcomed; however, using exclusively “the Global Standard for the IUCN Green List of Protected and Conserved Areas” as Headline Indicator is not supported, as management effectiveness on the national level may be assessed by various processes; the PAME-Database will need to be extended and updated to include these systems. Several additional elements have been suggested to “Coverage and effectiveness of protected areas and other effective area-based conservation measures”. a) “including extent to which they prohibit harmful activities”: It is highly doubted whether this is measurable as it would entail a Protected area by Protected area analysis of the legal provisions b) “in accordance with the human rights approach”: How would this accordance be measured? c) “and traditional territories (by governance type)”: a distinction by governance type can be supported; but the definition of PA + OECMs is a fixed one and should not be enlarged. Not suited as a HI indicator are • “Number of countries implementing national legislation, policies or other measures regarding free, prior and informed</p> |   |

consent related to conservation” • “Number of people who receive training on human rights in relation to protected and conserved areas”. 7.0.1: The assessment of the effects of nitrogen deposition by comparing it to critical loads for natural and semi-natural terrestrial ecosystems is a well-established method under the ICP Modelling & Mapping in the framework of the UNECE Convention on Long-Range Transboundary Air Pollution. In Germany the indicator is used for the national biodiversity and sustainability strategy. However, outside the convention the data situation could be thin: This relates to both national nitrogen deposition data and ecosystem specific critical load data. Focussing on emissions/losses (proposal t7.1 „Trends in Loss of reactive nitrogen to the environment“ (Appendix 1, page. 23).) would be much easier. The methodology for this possible indicator is rather new and has been developed under UNECE EPNB - Expert Panel on Nitrogen Budgets | Task Force on Reactive Nitrogen (clrtap-tfrn.org) and is currently (until 2023) being further developed for global use under the UNEP/GEF INMS-Project. The proposed indicator is in line with CBD/SBSTTA Recommendation 24/2, Annex I, Paragraph 2. 7.0.3: Support for “Use and risk of pesticide indicator (by risk category for biodiversity)”. This indicator might be developed by FAO, upon request. 10: An indicator proposal on the degree of implementation of sustainable marine fishery certification schemes could be added and complement the indicators on sustainable agricultural production and on progress towards sustainable forest management. 17: We do not think that a second/additional headline indicator is needed for Target 17. The six proposed alternative headline indicators can be considered as indicators. However, they are not directly functional, as e.g. the first four suggestions lack a measurable component like “number/amount/percentage of”. The fifth suggestion is in our view too narrow/detailed as headline indicator