

Response to the Update of the CBD Strategic Plan

Australia

General Comments

Overall, the Possible Outline and Elements of the New Strategic Plan is a well considered and drafted document and support is provided for the general approach for updating the CBD Strategic Plan outlined in document [UNEP/CBD/SP/PREP/2](#). That is:

- Maintaining the Strategic Plan as a high-level, short, targeted document (p2);
- Development of a 2020 mission (p2) and 2050 vision (p5);
- Use of multiple “SMART” (strategic, measurable, ambitious, realistic and time-bound) targets to measure progress toward a more over-arching target or mission statement (p7); and
- Development of a Strategic Plan that provides a more effective framework for national implementation (p2).

There are direct links and commonalities between the issues, example vision and mission statements, and example headline goals and targets described in document UNEP/CBD/SP/PREP/2 and the Ramsar Strategic Plan 2009-2015 endorsed at Ramsar CoP10. Issues of continued degradation and loss of wetlands, the need for an ecosystems-based approach toward national policy and decision-making, and the need for enhanced national implementation across governments, sectors and civil society are common to both Conventions. Similarly, the need to increase protected areas, to take action to restore degraded ecosystems and to increase capacity and resourcing for implementation at global, regional and national levels are themes repeated across both Conventions.

The example targets provided in document UNEP/CBD/SP/PREP/2 have direct links to Ramsar Convention strategies and key result areas under the Ramsar Strategic Plan 2009 – 2015. For example, targets 5 and 11 would require the establishment of a national wetland inventory as recommended in Strategy 1.1, Goal One - Wise Use of Wetlands under the Ramsar Strategic Plan. Similarly, Target 9 relates to treatment of invasive alien species under Strategy 1.9 of the Ramsar Plan. Again Target 3 and Ramsar Strategy 1.11, both relate to harmful or perverse incentives.

The targets are for the most part consistent in intent with relevant Australian frameworks such as the draft revised National Biodiversity Strategy.

The short time span covered by the draft Strategic Plan, however, makes many of the targets potentially unachievable. Notwithstanding the intention that Parties set their own targets, it may be more helpful to include longer term ‘nominal’ targets to provide a context for the 10 year targets. Some recognition should also be given to targets relating to halting/reducing declines in biodiversity that for longer lived species (eg., mammals, trees and some fish) such a target is generationally meaningless.

It could be useful if the introductory sections made the point that the targets are designed to operate together e.g. if the target relating to removal of unsustainable incentives is not met, the impact of meeting the targets relating to sustainability guidelines for resource sectors are likely to be less effective, or at worst, be undermined.

Some terms are used in the document are ambiguous or could be better defined, for example:

- ‘ecosystem services’ is used in a narrow, utilitarian context and, less often, in a broader sense that reflects the intrinsic value of ecosystem services and biodiversity. Reference to ‘valuable’/‘critical’ ecosystems services could be given a contextual qualification e.g. ‘critical to water supply, or pest control’;
- ‘indirect drivers’, ‘underlying causes’, ‘indirect causes’ – are all used and could be replaced with a single term;

- ‘value’ as an economic interpretation, may not always be appropriate e.g. in Target 1, and may require a broader interpretation to give the sense of the importance of biodiversity to many aspects of well-being.
- Terms such as ‘excessive use’ (page 9) are subjective and could be replaced with ‘unsustainable’ or similar.

Specific Comments

Section II - Vision

Document UNEP/CBD/SP/PREP/2 cites that the inputs and submissions from many Parties and contributors suggest that the vision for the CBD Strategic Plan should “constitute a long-term target for 2050” (p5). A list of common elements for a vision provided through contributions and submissions is provided.

Support for the development of a long-term 2050 target could be supported. However, it is notoriously difficult to craft a vision statement that effectively and efficiently captures the multiple elements influencing the development and implementation of something as complex as an MEA.

1st dot point—given the CBD experience with the 2010 target, it may be unrealistic to expect to halt biodiversity loss within another ten years due to extinction debt, population growth, policy inertia, long lifespans of many species, and climate change, unless this vision is seen to be purely aspirational.

5th dot point—this simply repeats the third aim of the Convention without adding anything to tie this aim back to strategic activities in the next ten years.

7th dot point—apart from the language being unclear, this point does not have the same ‘visionary’ character as the other points i.e. it is a level of detail down.

Section III - 2020 mission

Support for a 2020 mission to deliver biodiversity targets could be supported. The 2020 date aligns with key timeframes of other international and domestic processes such as the requirement for reviews of the *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999* at 10 year intervals (the next being due in 2019).

We also support the concept of utilising 2015 as an important milestone recognising the need to regularly assess progress during the period 2011-2020. Without such periodic assessments, there is often a tendency to assume that 2020 is “many years away”, with many State Parties assuming (wrongly) there will be plenty of time to address the targets.

We recommend a change to the final sentence of the mission statements: “To develop the capacity of countries to achieve this.”

It is also suggested that themes listed under points a) to d) on page 6 of document UNEP/CBD/SP/PREP/2, include an additional theme along the lines of:

“e) To develop and implement the necessary capacity to effectively measure progress toward the 2020 mission and 2050 vision.”

The use in the document, and increasing usage more broadly, of the concept of “preventing irreversible change/loss of biodiversity” as a real measure of sustainability could be concerning if this concept could be interpreted or applied in a manner that would enable “business as usual” practices to continue.

- Discussion of biodiversity conservation, at least in the global context, inevitably includes the observation that biodiversity conservation goals are not currently being met. Under

business as usual conditions, the rate of loss of biodiversity would likely to continue to increase.

Another common theme is the need for increased scientific understanding, monitoring and reporting. A policy or plan that attempts to accurately assess, measure or report “irreversible change/loss” before that threshold has been reached should be viewed with caution. Other similar expressions include “dangerous implications for human well-being” and “economic activities within safe ecological limits”. These ideas need genuine scrutiny and should be appraised with a realistic and precautionary view of their likely success as possible policy approaches.

A proposed overall mission statement should encompass the elements in (b), (c) and (d) on page 6 of the document.

Section IV - Strategic Goals and 2020 headline targets

General comments on the targets:

- The proposed targets are ambitious, particularly in the face of climate change, world food shortage and the capacity-building required for developing countries.
- Target 20 is essentially a foundation requirement for achieving the other targets at a global scale.
- There seems to be an implied message that all Parties will allocate sufficient resources in the pursuit of the targets but this needs to be clearly and overtly stated as many targets could be considered as having been met if a few countries contribute significantly and most contribute just a little.

The use of multiple SMART targets to measure progress toward a more over-arching target or mission statement is supported. National implementation and subsequent international reporting will be enhanced through tailoring domestic implementation policy to measurable targets.

Page 7, 3rd paragraph of part IV—suggest that these points need to acknowledge the uncertainties, which Parties must manage. For example, there is little certainty around how ‘tipping points’ might be avoided, but ‘best science’ and the precautionary approach can provide guidance. Suggest that an additional (third) point of ‘consideration’ be added, which would encompass the need to embed actions within an adaptive management approach and manage for a range of risk scenarios.

Strategic Goal A

Strategic Goal A - suggest research needs to be included in list of actions to address drivers of biodiversity loss.

Page 8, 1st paragraph of Strategic Goal A— suggest that the first sentence should refer to bringing ‘total *resource* consumption’ within ecological limits; add environmental accounting as a tool alongside strategic environmental assessment;

Target 1. An ambitious target that might be achievable in some developed countries (e.g. Australia); but probably too ambitious for a global target. The term “everyone” would have to be described to ensure this target is realistic given the varying circumstances of individuals. Suggest alternate wording: “*By 2020, State Parties that are signatories to the CBD have substantially increased awareness of the value of biodiversity and the steps their population can take to protect it.*”

Target 2. An ambitious target that is unlikely to be achieved in many countries, let alone as a global target. Suggest the target be modified to move towards a more effective assessment of the key components of biodiversity (including ecosystem goods and services) by 2020. Suggest something more along the lines of the Afghanistan target ie “*By 2020 the principles of sustainable development will be integrated into the policies and programmes of 75% of the State Parties that are signatories to the CBD.*”

In the technical rationale suggest alternate wording as follows: “the presence of strategic environmental impact assessment systems” may be more appropriate, as assessing cumulative impacts is important for biodiversity conservation.

Target 3. Suggest this be augmented through adding a complementary target aimed at action to mitigate the impact of invasive alien species that have already become established. In the technical rationale also could include the idea that ‘subsidies’ could include the absence of or inadequate price signals associated with the use of natural resources.

Target 4. Australia recommends caution when adopting or supporting methodologies such as “ecological footprints”. Such metrics are complex and it can be difficult, in practice, to meaningfully quantify all components. In light of these challenges, ecological footprint measures inevitably incorporate a number of assumptions and indirect estimates which can lead to biases. Even where inclusion of such assumptions is warranted, they need to be assessed and tested. This assessment must take into account a broad view of national and international environmental, social and economic circumstances and recognise the role of policy settings and market processes. This target needs to be more firmly related to biodiversity outcomes to be acceptable.

Strategic Goal B

This is an important passage in the sense of its appreciation of the inherent complexity of biodiversity conservation challenges. The potential roles of improved spatial planning and technology are acknowledged and a pragmatic approach suggested to prioritising action and focussing on the causes of biodiversity loss. Suggest that this manner and approach be incorporated where possible throughout the Strategic Plan. Suggest amendment of the first sentence to read – “this will continue to translate” rather than “this will translate”. Use of ‘decouple’ here does not really cover the connection between most indirect and direct drivers i.e. while population growth might be able to be ‘decoupled’ from current use of resources, it does not address the key issue of under pricing of resources as a driver of habitat loss.

Target 5. Efforts to reduce deforestation and forest degradation are supported; however, the technical rationale underpinning the 50% reduction target needs a more careful treatment. Rather than focussing on gross deforestation per se, the CBD should be considering whether ‘primary forests and other high-biodiversity value habitats’ are being sustainably managed. This is because avoided deforestation does not automatically lead to positive outcomes for biodiversity.

This target also does not address the threat to biodiversity posed by further fragmentation of native vegetation and habitats. Rather than focusing on forest ecosystems, this target could give equal prominence to a range of eco-types including freshwater, estuarine and marine ecosystems. In the context of carbon sequestration, suggest replace current text with ‘carbon sequestration by natural systems, including forests and wetlands.’

Target 7. All countries’ agriculture, fisheries and forestry production systems should be managed sustainably. To this end, some industries adopt sustainability criteria to benchmark their environmental performance, while others take a more informal approach.

The draft notes that ‘as yet, there are no universally agreed sustainability criteria’, but this should not be surprising given the diversity of production systems and agri-environmental conditions both within and between countries. This being the case, it is unclear why the paper should foreshadow the ‘development of a more common approach.’

The development of universally agreed sustainability criteria for all agriculture, aquaculture and forestry industries is unrealistic and represents a ‘one size fits all’ approach to a complex issue. Such a proposal is contrary to the strategic plan’s principle of providing a ‘flexible framework for national targets’ (page 7).

A better approach to this issue is to recognise that governments and industries need flexibility to sustainably manage their agriculture, fisheries and forestry resources in accordance with their

particular agri-environmental, social and cultural circumstances. On this basis, references in the paper to 'sustainability criteria' should be replaced with 'managed sustainably' (or words to that effect).

The excessively negative tone in the first sentence of the technical rationale conveys the impression that agriculture is inherently bad for biodiversity and should be amended as follows:

"The ecologically unsustainable consumption of water and use of pesticides and ~~excess~~ fertilizers, and the conversion of natural vegetation to ~~of~~ uniform monocultures, among other factors, can have ~~majof~~ negative impacts on biodiversity inside and outside of agricultural, forest and coastal ecosystems."

The technical rationale again refers to each sector developing its own sustainability criteria – need to acknowledge inter-sectoral issues e.g. require overarching measures to consistently protect biodiversity values.

Target 8. Suggest the inclusion of a reference on the need to develop and implement national water quality guidelines, such as the National Water Quality Management Strategy (NWQMS) developed by Australia and New Zealand, to limit nutrient loading, pollution levels and algal blooms in freshwater and marine environments. Additionally, guidelines on the use and quality of recycled water, such as for irrigation or food production should also be mentioned in terms of targets for limiting nutrient loads and pollutants. These guidelines and target values should be based on the best available science.

Target 9. An ambitious target that might be achievable in some countries; but probably too ambitious for a global target. Suggest reword to " *By 2020, national action plans for prevention and control of invasive species have been prepared for 75% of the State Parties that are signatories to the CBD*".

Target 10. This target is impossible to achieve, given the amount of climate change locked into the system and given time lags etc. However, it is feasible to reduce emissions and to maximise the capacity of systems to cope with (be resilient to) unavoidable change. Suggest the target is reworded accordingly.

Strategic Goal C

A key issue not mentioned here is the need for conservation management of private land or land that is currently private i.e. 'matrix' management of landscapes.

Target 11. This target may be aspirational, particularly as it relates to marine zones. The rationale mentions "representivity" but not to the full range of reserve design principles. Complementarity is an important point as is spatial configuration (and therefore functional connectivity). It would be good to have this emphasised here. It is also important to note that complementarity is important not just across ecosystems but also within.

Suggest drawing on the recommendations of the World Parks Congress (and other forums) to continue: "Protected areas should be established and managed in close collaboration with indigenous and local communities. *These communities should share equitably in the benefits arising from protected areas.*"

Target 13. An ambitious target that hopefully is achievable in many countries. However suggest that wording along the lines of the target suggested by Brazil is more appropriate that the proposed global target e.g. "*By 2020, the genetic diversity of wild relatives of cultivated plant species be effectively conserved in situ and/or ex situ for 60% of the State Parties that are signatories to the CBD*".

Target 14. Refer to ecologically *sustainable* management of ecosystems; replace reference to loss of carbon/GHG with *release* of carbon/GHG.

Strategic Goal D

Include research as aspect of supporting implementation.

Target 19. Is somewhat repetitious of Target 2 - suggest that Target 19 be split into two parts; increasing knowledge scientific research etc and sharing expertise, knowledge and information between the countries/Parties (this should be stronger); or alternatively aimed at monitoring aspects of biodiversity with less emphasis on ecosystem goods and services. This target could also mention the need to develop strategies/tools to improve risk management.

Target 20. It is important to emphasise the need to first and foremost safeguard and build on existing capacity. This target will require more work to be applicable to both developed and developing countries. Is it feasible for developed countries to increase capacity (human and financial resources) for implementing the Convention tenfold? Developing countries, least developed countries and Pacific Island States may be starting from a very low base with regard to capacity so a tenfold increase may be feasible. However, developing countries may already be applying substantial resources to implementation, making it more difficult to secure a tenfold increase.

Additional

Suggest a new target be added relating to the over-extraction, overuse and diversion of a water resource. This is particularly pertinent to freshwater and groundwater resources. While Target 7 hints at this it does not cover the issue adequately. This is not restricted to agriculture, aquaculture and forestry but also covers mining, energy production, human consumption and waste disposal.

SUGGESTED CLUSTERING OF TARGETS UNDER COMMON HEADINGS

Education, Knowledge and Understanding

1. By 2020, everyone is aware of the value of biodiversity and what steps they can take to protect it.
2. By 2020, the value of biodiversity, and the opportunities derived from its conservation and sustainable use, and the fair and equitable sharing of benefits from the use of genetic resources, are recognized and reflected in all countries, in national development policies and strategies, national accounts, economic sectors and spatial planning processes at all levels of government, and by the private sector, applying the ecosystem approach
19. By 2020, knowledge and technologies relating to biodiversity, its value and functioning, its status and trends, and the consequences of its loss, are improved and widely shared, and uncertainties concerning biodiversity change, ecosystem services and impacts on human well-being are reduced

Governance, Planning and Resourcing

4. By 2020, governments and stakeholders at all levels and businesses and civil society have formulated and begun to implement sustainability plans to increase efficiency, reduce waste and limit the consumption of resources within ecological limits
16. By 2020, each Party has an appropriate, up-to-date, effective and operational national biodiversity strategy, consistent with this Strategic Plan, based on adequate assessment of biodiversity, its value and threats, with responsibilities allocated among sectors, levels of government, and other stakeholders, and coordination mechanisms are in place to ensure implementation of the actions needed;
20. By 2020, capacity (human resources and financing) for implementing the Convention has been increased tenfold.

3. By 2020, subsidies harmful to biodiversity are eliminated.

Conservation and Restoration

5. By 2020, deforestation and forest degradation, and the loss and degradation of other natural habitats is halved.
8. By 2020, pollution from excess nutrients (N and P) has been brought below critical ecosystem loads.
10. By 2020, the impacts of climate change and of ocean acidification on ecosystems have been reduced and responses to climate change that are not detrimental to biodiversity have been agreed. (SMART target to be developed).
11. By 2020, at least 15% of land and sea areas, including the most critical terrestrial, freshwater and marine habitats, have been protected through effectively managed protected areas and/or other means, and integrated into the wider land- and seascape
12. The extinction of known threatened species (vertebrates and higher plants) has been prevented.
15. By 2020, terrestrial, freshwater and marine ecosystems that provide critical services that build ecological resilience or that contribute to local livelihoods and climate change adaptation have been safeguarded or restored, and adequate and equitable access to essential ecosystem services is guaranteed for all, especially indigenous
9. By 2020, the introduction and establishment of invasive species has been prevented and emerging infectious diseases of wildlife controlled. (SMART target to be developed).
14. By 2020, the contribution of biodiversity and terrestrial, freshwater and coastal ecosystems to sequestering and retaining greenhouse gases has been enhanced.

Sustainable Use

6. By 2020, pressure on marine ecosystems through overfishing halved, and destructive fishing practices are eliminated;
7. By 2020, all areas under agriculture, aquaculture and forestry are managed according to sustainability criteria.
13. By 2020, the status of crop and livestock genetic diversity in agricultural ecosystems and of wild relatives has been improved. (SMART target to be developed).
17. By 2020, access to genetic resources is enhanced, and substantial benefits are shared, consistent with the international regime on access and benefit sharing; .
18. By 2020, traditional knowledge, innovations and practices and the rights of indigenous and local communities over these are protected. (SMART target to be developed at global and national levels).

Section V - Implementation, monitoring, review and evaluation

Support for the proposal that the Strategic Plan “should focus on the tasks supporting effective implementation by Parties”, and that “new guidance is informed by the experience of Parties in implementing the Convention”.

The Ramsar Convention faces similar obstacles in ensuring that strategic actions and targets and associated guidance are clearly directed at enhancing domestic implementation by Parties and are informed by the Parties themselves based on their experiences with implementation at the domestic level.

Page 15—The reference to the principle of adaptive management under ‘Review by the Conference of the Parties’ is the first such reference – should be much closer to the front.

Section VI – Support mechanisms

(page 16)

The reference to “payments for the use of hitherto ‘free’ ecosystem services” could be expanded to include discussion of the potential role of market-based instruments. Australia sees these measures as preferable to penalties or direct service fee payments.

Section VII – Elements for the multi-year programme of work

As per comments under Section V re effective implementation.