

10 January 2010

Dr. Ahmed Djoghlaif  
Executive Secretary  
Secretariat of the Convention on Biological Diversity  
413, Saint Jacques Street, suite 800  
Montreal QC H2Y 1N9  
Canada

Dear Dr. Djoghlaif,

In reply to Notification 2009- 169 (Document SCBD/ITS/DC/LC/69800 of 4<sup>th</sup> December 2009) on the **Revision and updating of the Strategic Plan**, TRAFFIC would like to transmit the following views as regards document UNEP/CBD/SP/PREP/2 '**Revision and updating of the Strategic Plan of the Convention: Possible Outline and Elements of the New Strategic Plan**' of 30<sup>th</sup> November 2009.

TRAFFIC welcomes the overall concise, yet sound and strategic document. TRAFFIC considers the new version of the Strategic Plan to be concrete and action-oriented and further strongly believes that the experience gathered in the development and implementation of the Global Strategy for Plant Conservation, a programme strongly supported by both the Parties and by non government organisations including TRAFFIC, contain useful lessons for the next phase of the CBD Strategic Plan.

As regards the revised version of the Strategic Plan, TRAFFIC broadly agrees with the draft as referred to in document UNEP/CBD/SP/PREP/2.

However, TRAFFIC strongly believes that further clarification, alterations and additions are needed to strengthen the Strategic Plan of the Convention.

1. TRAFFIC welcomes the fact that overall SMART targets have been developed for the CBD Strategic Plan. However, regarding page 7, Chapter IV. 'Strategic Goals and the 2020 Headline Targets', the development and inclusion of milestones for each of the targets is deemed necessary to allow for an assessment of intermediate results. Attaining agreed milestones of the Strategic Plan should be given a high priority by the CoP. Parties should be requested to report on these immediately prior to each CoP, allowing for review at the meeting itself. For this purpose, the CBD Secretariat should develop a suitable reporting format.
2. Further down on page 7, TRAFFIC suggests more explicit wording for the contribution of national targets to the overall Targets of the Convention.

We hence suggest that the current wording

“Targets would comprise both:

- (a) aspirations for achievement at the global level, and
- (b) a flexible framework for national targets.“

2

§

A joint programme of



TRAFFIC, the wildlife trade monitoring network,  
works to ensure that trade in wild plants and animals is not a threat to the conservation of nature.

Charity Registration no: 1076722

.....would be altered to include an addition

“Targets would comprise both:

- (a) aspirations for achievement at the global level, and
- (b) a flexible framework for national targets which should contribute to the global level targets.”

3. Specifically, as there is no mention of any funding mechanism to allow for an enhanced implementation of the new Strategic Plan of the Convention, TRAFFIC suggests that a new overarching Target on the Generation of Funding be integrated, with a funding indicator developed for each and every single target, that relates to levels of generated funding that contribute to all those global level biodiversity targets agreed by the Parties. This new Target should be gauged at global and at national level.

4. For Target 2 on page 8, TRAFFIC further suggests more explicit wording for the assessment of the value of biodiversity. We particularly suggest that the following wording be included:

“The state of the value of *used* biodiversity from the wild (i.e. living wild natural resources that are, e.g., harvested, hunted, fished, caught, collected and/or traded from terrestrial, marine and freshwater ecosystems) should be assessed regularly, and provided to the Parties on a regular basis immediately prior to each of the Conferences of the Parties.”

To provide the means for evaluating progress on this target, this assessment should, along with TEEB, be incorporated into a specific toolbox, for this Target.

This ‘State of the value of *used* biodiversity from the wild’ could be given a more catchy title if needed. Please also note TRAFFIC’s comments on the draft Synthesis and the extended version of GBO-3 for SBSTTA 14 (viz. Document UNEP/CBD/SBSTTA/14/8 "Third edition of the Global Biodiversity Outlook [GBO-3]: implications for the future implementation of the Convention").

TRAFFIC has gathered baseline data and gained leading expertise since more than 30 years in this field, and is one of the key active contributors within the Biodiversity Indicators Partnership <http://www.twentyten.net/keyindicatorpartners>. Hence TRAFFIC would certainly welcome to be accounted as a leading organisation or key contributor to this global undertaking.

5. Target 4 on page 9 mentions, i.a., “...maintain the use of resources within ecological limits”. TRAFFIC suggests to use more explicit language to differentiate between resources from biodiversity, i.e. from living renewable natural resources, and those resources of non-renewable natural origin. Within the biodiversity part, we advise to explicitly mention both biodiversity components, that ‘from the wild’ and that ‘from largely managed ecosystems (agriculture, aquaculture and forestry)’.

6. Target 5 on page 10 currently reads “By 2020, Deforestation and forest degradation, and the loss and degradation of other natural habitats is halved.” TRAFFIC supports the view of many governments and organisations that pledged for zero net deforestation by 2020, as presented during CBD CoP 9 in Bonn. We therefore suggest that the target be reworded respectively.

7. TRAFFIC suggests that the loss and degradation on non-forested terrestrial (semi-arid and arid ecosystems; polar ecosystems; montane ecosystems beyond treeline, etc.) habitat is merited and should be specified in a Target that is separated from Target 5.

8. Regarding the marine Target 6 on page 10, TRAFFIC suggests to reword the current Target to now read “By 2020, Pressure on marine ecosystems through overfishing and bycatch halved, and destructive as well as illegal, unreported and unregulated (IUU) fishing practices are eliminated.”

9. TRAFFIC further suggests that the incorporation of a separate and specific Target on freshwater biodiversity is merited, which would read: ‘Halting the loss, fragmentation and degradation of freshwater habitat and its biodiversity, particularly caused by the over-exploitation, pollution and excess nutrient loading of water, the over-exploitation of living renewable natural resources and the introduction of alien populations and species into freshwater systems.’

10. On page 11, Target 9 rightly stresses the urgent need for ‘prevention of the introduction and establishment of invasive species and the control of emerging infectious diseases of wildlife’ and suggests SMART targets to be developed at global and national levels. Due to the fact that many alien species and respective emerging infectious diseases are transmitted through international trade routes that are perfectly legal, TRAFFIC urges the Secretariat of the CBD to cross-reference Target 9 with the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and the working means and control mechanisms that were developed and put in place by the Parties to CITES to monitor and control such legal trade, including such that are implemented in partnership with the respective animal health and phytosanitary regulating bodies at national and supra-national levels. We also suggest to add the CITES Secretariat to the Synergy Organisations under the Annex.

11. TRAFFIC strongly believes that Target 12 on page 12 could be much strengthened if an ‘Early Warning’ section could be added. We hence suggest the Target to be reworded to now read “The extinction of known threatened species (vertebrates and higher plants) has been prevented, and responses been catalysed to new and emerging knowledge about levels, patterns and trends of direct and indirect threats to flora and fauna at global and national level.” Direct threats should include harvest, hunting, fishing, catch, collection and/or trade from terrestrial, marine and freshwater ecosystems.

12. Target 13 on Agrobiodiversity (page 12) rightly includes the status improvement of wild relatives of said biodiversity. The technical rationale for Target 13 puts much emphasis on and ex situ conservation, in situ conservation inside and outside protected areas, cultivation and on agricultural practices. However, regarding the wild relatives of agrobiodiversity, particularly of plants and animals used for medicinal, food, and aromatic purposes it puts far too little emphasis on the sustainable use side of those resources. TRAFFIC therefore suggests to be more explicit and reword this target to now read “By 2020, the status of crop and livestock genetic diversity in agricultural ecosystems and of wild relatives has been improved through means of in situ conservation inside and outside protected areas, sustainable harvest and use practices, and sound ex situ management and agricultural practices.”

Please also note TRAFFIC’s comments submitted on Document UNEP/CBD/SBSTTA/14/17 for SBSTTA 14 "Incentive measures (article 11) - Information and good practice cases from different regions on the identification and removal or mitigation of perverse, and the promotion of positive, incentive measures.

13. On page 15, Target 20 calls for a tenfold increase of the Capacity (human resources and financing) for implementing the Convention by 2020. TRAFFIC strongly suggests to aim at pooling the necessary resources for Capacity Building with other multilateral biodiversity-related environmental agreements requiring such capacity building to halt the loss of biodiversity, such as, e.g., CITES, CMS, Regional Fisheries Management Organisations, etc. As an NGO with a long standing experience in building the capacity of conservation decision makers and their staff, natural resource managers, and other agencies (customs, judiciary, enforcement officials, police, etc.), TRAFFIC has often come across surprised target audiences (particularly the decision makers responsible for training budgets) who did not understand why an audience were to be trained or capacity was to be built in separate sessions and courses, in what they thought were essentially very much related fields of biodiversity management, and the conservation and sustainable use hereof, etc.

14. Within the Framework Annex as of page 19, TRAFFIC further intends to contribute to the (current) Targets 2, 4, 5, 6, 7, 12, 13, 15, 16, 17, 18, 19, and 20.

We sincerely hope that our contributions will help to strengthen the draft Strategic Plan of the CBD and remain committed to help the Parties and the Secretariat to the Convention in its implementation.

Yours sincerely,



Steven Broad  
Executive Director