



# Australian ENGO Position on the First Draft of the Post-2020 Global Biodiversity Framework

## Introduction

As leading conservation organisations collectively supported by millions of Australians, we welcome the opportunity to contribute to the Australian Government’s position on the First Draft of the Post-2020 Global Biodiversity Framework (GBF) ahead of the resumed negotiations taking place from 13 March 2022 in Geneva.

The fifteenth meeting of the Conference of the Parties to the United Nations Convention on Biological Diversity (CBD) is an important opportunity to galvanise international and domestic commitments to do what nature needs in the next decade. Few parties to the CBD have as much at stake as Australia - the only developed and megadiverse party to the convention.

The goals, milestones, and targets in the First Draft, while overall an improvement on the Zero Draft, collectively remain far from the level of ambition that will be required to achieve the transformative change Australia and the world needs.

For the GBF to align with the vision of the CBD and support implementation of a pathway to a world living in harmony with nature, its central mission needs to be a clear and urgent commitment to halt and reverse biodiversity loss and to be **nature-positive** by the end of this decade. For the mission to be achieved, the targets and milestones must be more specific, measurable, and aligned with what science tells us is needed to ensure a nature-positive world.

Ensuring that the GBF we need is adopted and implemented will also require parties to show leadership through their respective commitments in support of the mission. Australia has a responsibility to deliver the ambition expected at home to protect and restore what we love, and an opportunity to show leadership for the global ambition we need. It can lead by fulfilling the commitments of the High Ambition Coalition for Nature and People, Global Oceans Alliance, and Leaders Pledge for Nature<sup>1</sup>, and translate these into a far more ambitious GBF. The first step is to strengthen the First Draft in the following priority areas.

## Priority proposals to improve the First Draft of the Post-2020 GBF

### 2030 Mission

The current 2030 mission is neither clear nor ambitious enough to deliver the 2050 vision of restoring and living in harmony with nature. The GBF must provide direction and urgency at the highest political level by setting a measurable, science-based goal for cooperative action by governments, business, and civil society. Science tells us that by 2030 we must have halted and reversed nature loss to be net-positive, measured from a baseline of 2020. The long-term certainty of a clear and measurable mission aligned with scientific

<sup>1</sup> The High Ambition Coalition for Nature and People is endorsed by 77 CBD parties including Australia; the Global Oceans Alliance is endorsed by 70 CBD parties including Australia; and the Leaders Pledge for Nature endorsed by 94 CBD parties.

advice is vital to ensure government policy, financial investments, and business decisions are aligned with a nature-positive world.

- Australia should propose improved wording in the 2030 mission statement so that it includes an unambiguous commitment to **take urgent action to halt and reverse biodiversity loss to achieve a nature-positive world by 2030 and put biodiversity on a path to full recovery**.

Species, ecosystems, and protected areas (Goal A, Milestones A.1 and A.2, and targets 2, 3, 4, and 6)

- **Goal A** should be refined to align with the Leaders Pledge for Nature commitment to **clear and robust goals and targets** (2.a) and to **halt human induced extinction of species** (2.b)
  - “Rate of extinctions” is difficult to measure and approaches to doing so vary. It is not appropriate as a GBF goal.
  - “the rate of extinctions has been reduced at least tenfold” should be replaced with a clear and unambiguous commitment to **prevent extinctions**. Aichi Target 12 committed parties to “prevent the extinction of known threatened species by 2020” - the way this goal is expressed is a step backwards from this ambition.
- **Milestone A.1**
  - Insert the term **ecosystems** in place of “natural systems” for consistency with Goal A.
  - Add commitment to **reverse the decline of highly intact or highly vulnerable ecosystems** (including climate vulnerable ecosystems).
- **Milestone A.2**
  - This milestone should include an unambiguous commitment to **halt human induced extinction by 2030**, rather than the less ambitious commitment to halt or reverse the increase in the rate of extinction. (See Leaders Pledge for Nature 2.b).
  - Extinction risk should be **reduced by at least 20%**.
  - Add **the average population abundance of species is increased by at least 20%**
  - The proposed Australian Government wording to insert a reference to ‘due to direct human activity’ is not supported as we are concerned that this ambiguous wording potentially excludes a broad range of threats which may not be able to be directly attributable to human activities, but to which humans have contributed.
- The level of ambition for ecosystem restoration in **Target 2** should be increased to **at least 50% degraded ecosystems under restoration** to ensure that we will halt and reverse biodiversity loss and achieve the proposed milestones, including milestone A.1.
  - Twenty percent degraded ecosystems under restoration is not adequate to ensure we will halt and reverse biodiversity loss and achieve the proposed milestones, including in milestone A.1. In addition, it would be very far from the level of ambition of SDG 15.1 that underlines the need, by 2020, to “ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems”.
  - To effectively address biodiversity loss and climate change and considering the lack of consensus and harmonised data in defining ‘degraded ecosystems’, this commitment should be based on a proportion of the overall global land and sea area and implemented with a view to restore natural habitats and connectivity in conjunction with targets 1 and 3.
- The 30 x 30 commitment in **Target 3** is supported with the following refinements:
  - This target should explicitly **include freshwater and inland water ecosystems**.
  - Given their significant role in the conservation of biodiversity, it is paramount that in the process of protecting and conserving 30% of areas, that **IPLC rights to land territories and resources** are at the same time **recognised and secured**.

- Focus on the effective conservation and restoration of the values of all **Key Biodiversity Areas** and other sites of particular importance for biodiversity and require them to be representative and resourced and managed effectively. Include prioritisation of important areas for biodiversity such as KBAs or High Conservation Value areas.
  - Make the target specific to bioregions or other units representing landscape diversity not arbitrary national boundaries.
  - Incorporate connectivity and consider landscape and migration patterns in building protected area networks.
  - In support of the adoption of this target in disaggregated form, Australia should improve its domestic position to include at least a 30% terrestrial protected area commitment in line with the principle of common but differentiated responsibility.
- **Target 4** should focus on preventing extinctions, reducing extinction risk, maintaining abundance of non-threatened species and the sustained recovery of wild species. It should also include a measurable target for the recovery of threatened species and require the implementation of effective and intensive recovery actions for species whose survival depends on such actions or whose recovery cannot otherwise be enabled or sustained.
  - **Target 6** should be more ambitious in relation to the reduction in rates of introduction and establishment of invasive alien species (IAS). We are of the view that this target should state **preventing or reducing their rate of introduction and establishment by at least 80%**. We are supportive that the current target includes key elements: pathways for invasion, reductions of impact on priority sites of priority invasive alien species but are concerned that there is no measurable target or indicators for these components. We recommend that the second part of the target ensures that there is both a) the elimination or reduction in impact of all priority IAS and b) the elimination or reduction of impact of IAS at all priority sites. Additionally, criteria must be developed to inform how priority IAS and sites are identified. We note that any definition of priority sites must include high biodiversity value areas. The current target could also be better clarified to indicate ‘priority species’ refers to IAS.

Whilst stronger ambition is needed in the target, there is also a significant amount of work needed to improve indicators for this target at the global and national levels. Increased data collection and significant improvements in transparency will be needed to effectively monitor rates of incursions and establishment. We echo calls by the Group on Earth Observations Biodiversity Observation Network (GEOBON) in progressing indicators for this target, including through the Global Register of Introduced and Invasive Species (GRISS), that effectively track invasive alien species occurrence and impact data, including for specific pathways.<sup>2</sup>

#### Integration of climate and nature (Target 8)

- Efforts to minimise the impact of climate change on biodiversity listed in **Target 8** should include nature-based solutions (NbS).
  - We welcome the inclusion of a stronger target that focuses on minimising the impact of climate change on biodiversity through mitigation and adaptation, and which quantifies the contribution of ecosystem-based approaches to mitigation (i.e., at least 10 GtCO<sub>2</sub>e/year which is in line with this research). We do not support the Australian Government’s proposed removal of the quantified contribution of Nbs/ecosystem-based approaches to mitigation (i.e. at least 10 GtCO<sub>2</sub>e/year to global mitigation efforts). We believe including this quantified contribution will help support more effective integration between the objectives of the CBD and UNFCCC, which is necessary for the success of both as

<sup>2</sup> See <https://geobon.org/ebvs/working-groups/species-populations/ebv-for-invasion-monitoring/?hilite=%27invasive%27%2C%27species%27> for further information

demonstrated by joint work by IPBES and the IPCC.

- However, we note that all references to nature-based solutions have been removed, putting sole emphasis on ecosystem-based approaches.
- The GBF should include nature-based solutions, which encompass ecosystem-based approaches, while ensuring alignment with a rights-based approach and global standards for NbS, prioritising action as follows: 1. protect, 2. manage 3. Restore, so that they do not cause harm to biodiversity or people.

Resource Mobilisation and Mainstreaming (Goal D, Milestone D.1, Milestone B.1 and targets 14 and 15)

To achieve the transformative vision of the CBD requires that biodiversity be mainstreamed via a whole-of-government approach, and in cooperation with the private sector and civil society. This requires that nature and nature's contributions to people are comprehensively and transparently measured and monitored as a starting point. Australia can lead by example by quickly implementing the agreed UN statistical framework for natural capital accounting - the System of Environmental - Economic Accounting (SEEA-EA) and harmonising national environmental accounts, for example through the ABS. This will facilitate embedding nature into decision-making within the private sector and government.

But transformation requires more than measurement, it is therefore vital that the GBF's goals and targets are translated into budgets as well as national laws and regulations that are enforced to ensure that they deliver the intended outcomes for biodiversity, and to level the global playing field for business and investors. Public and private funding for nature restoration and protection needs to increase in line with science-based targets for nature recovery.

- **Milestone B.1** should be strengthened. It is not enough for nature to inform and be accounted for when making decisions, those decisions must also contribute to the transformation to a nature-positive world. Words to the effect of ***in support of the achievement of a nature-positive world*** should be added to **Milestone B.1**.
- **Goal D** - We do not support the Australian Government's proposed amendment to Goal D to add the words 'to strive to' close the gap between available financial and other means of implementation. This wording substantially weakens this goal.
- **Milestone D.1** Australia should withdraw its proposed deletion in Milestone D.1 and support a target of closing the financing gap by at least \$US700 billion per year.
- **Target 14** should be strengthened to adequately account for the finance sector's role in contributing to harmful practices and its potential to allocate capital to nature-positive practices. It should specifically refer to ***public and private*** financial flows. It should also require financial institutions to ***measure, assess, disclose, and account for risks, dependencies and impacts associated with biodiversity loss and reflect assessed risks and opportunities in their investment decisions.***

We welcome a target on business activity and note the business sector's support for a strengthened target. Reducing negative impacts by half will not be enough to achieve the mission and vision of the GBF – businesses must align all their practices to a nature-positive economy which requires the avoidance of all harmful practices. The target should also reflect the action *parties* must take, not the voluntary contributions of business i.e. parties should adopt regulatory measures and incentives to ensure that all businesses contribute and transform their practices.

- **Target 15** should be strengthened by inserting wording specifying that parties will ***adopt regulatory measures requiring*** businesses to alter their activities in line with the text of the target. It should also require business to ***avoid all*** negative impacts, ***disclose*** nature-related risk, ***ensure public reporting on their dependencies and impacts on biodiversity along their full supply chains and practices*** and ***implement deforestation and conversion free supply chains.***
- We oppose the Australian Government's proposal to remove the words 'by half' as a metric for business impact reduction as we believe it is critical to include a measurable target to guide business transformation. Various tools and methodologies needed to measure impact are in advanced stages

of development, and where gaps exist in data that should be a motivation to improve environmental accounting, not an excuse to avoid setting measurable targets.

- Globally we must identify and commit financial resources from all sources commensurate with full and effective implementation of an ambitious GBF, including an increase in international public finance for biodiversity (primarily grants) to at least \$60 billion per year from developed countries to developing countries, as part of closing the biodiversity finance gap. We must establish and deliver national biodiversity finance plans, and a process to track biodiversity finance commitments (both direct and indirect) (Target 19 and resource mobilisation plan).

### Indigenous people and local communities

- **Target 3** should recognize IPLCs lands and waters as a separate and additional category - since IPLC lands and waters are not necessarily included in OECMs. It is important to secure the rights of IPLCs to their lands and waters but not make it conditional to a system of PA and OECMs. This target should ensure that areas governed by IPLCs are appropriately recognized and secured by respecting their Free, Prior and Informed Consent.
- A rights-based approach (RBA) needs to be more consistently integrated across the document, since this is cross-cutting and consists of several elements. Each one of these elements needs to be integrated at the appropriate place at the goals, milestones, and targets levels to ensure an effective RBA in the implementation of the GBF.
- The GBF should align fully to State obligations under accepted human rights conventions and declarations, including ILO169 and UNDRIP (which uphold Indigenous rights) and integrate the newly recognised right to a clean, healthy, and sustainable environment. A rights-based approach means:
  - respecting, protecting, and fulfilling Indigenous rights, lands, and resources;
  - ensuring free, prior and informed consent (FPIC) and other mechanisms for full and effective participation of Indigenous Peoples;
  - establishing a strong accountability mechanism; and
  - enhancing access to justice and flows of financial and technical resources, with a focus on capacity building and local empowerment (Section B.bis, Targets 20 and 21).

### Perverse and harmful incentives

- More clarity and transparency are needed on estimates of figures for harmful subsidies. The numbers presented for a decrease in harmful subsidies are likely underestimated and do not represent all harmful subsidies. The estimates do not include private financial flows in the finance sector that are harmful to biodiversity and based on data that is still fragmentary.
- Nonetheless all public and private financial flows must be aligned with a nature-positive economy, including through the removal or redirection of all harmful subsidies and incentives.

### Addressing drivers of biodiversity loss

- Include a milestone to halve the footprint of production and consumption by 2030 and targets covering all drivers, including food systems, diets, and infrastructure. These drivers are absent from the current draft and need to be addressed in order to reverse biodiversity loss by 2030.

### Implementation

- To avoid a repetition of the failure to meet the Aichi targets, it is essential that a strong implementation mechanism is fully integrated and adopted together with the GBF. Therefore, the draft text on responsibility and transparency needs to be significantly strengthened, ensuring the inclusion of an effective implementation mechanism that holds countries to account and that allows for a ratcheting of actions over time. We must maximise opportunities drive collective progress towards the global goals by ensuring comparability of national commitments and progress through aligned common formats for NBSAPs and reporting, and ideally annual independent reporting of

global progress via a subset of headline indicators (e.g. coverage of KBAs by PAs/OECMs and the Red List Index, SDG indicators already reported annually etc).

- Without this the regular and accurate monitoring and reporting of progress, and therefore accountability and strength of the implementation mechanism, is undermined.

Joint position endorsed by:

Australian Conservation Foundation

BirdLife Australia

World Wide Fund for Nature-Australia

The Wilderness Society Australia

The Invasive Species Council

Bush Heritage Australia