WCS recommendations for technical experts and CBD Parties regarding the GBF monitoring framework

Updated: May 2023 || **Contact:** adegemmis@wcs.org

WCS welcomes the adoption of a provisional monitoring framework by CBD Parties at CoP15, as well as the establishment of an *ad hoc* technical expert group to review and refine the monitoring framework for consideration ahead of CBD CoP16. This document contains updated recommendations from the Wildlife Conservation Society (WCS), with guidance on how to improve the current monitoring framework for the GBF.

We have the three **'cross-cutting' messages** for ad hoc technical expert group members and CBD Parties:

1) Identify linkages to streamline the framework and address gaps: WCS recognizes the significant costs and other challenges associated with monitoring a large number of indicators at national and global levels. Certain "disaggregations" or segmentation into subsets of data already reported, can facilitate tracking of progress against multiple goals/targets and their different elements. For example, the IUCN Red List can provide both an overall picture of progress on species conservation for Goal A, while Red List assessments for specific taxonomic groups can provide an indication of, for example, whether species targeted for commercial use are being exploited sustainably (Target 5). As another example, trends in the extent (A.2) and integrity (A.1 and others) of certain high carbon ecosystems, such as forests and peatlands, particularly versus competing land uses such as agriculture, can provide an assessment of whether nature is maintaining its contribution to global climate regulation without discussing quantitative emissions targets as under the UNFCCC. This could help address a critical gap in tracking progress against Target 8.

2) Clarify the relationship between individual and composite indicators: Relationships between individual metrics/indicators and *composite* metrics/indicators in the monitoring framework are not always clear. Both are important -- individual metrics track attributes of biodiversity, including of ecosystems, that have unique relationships, but composite metrics look *across* metrics/indicators to assess the cumulative interaction and complexity of values. Such composite metrics often provide a clearer sense of ecosystem integrity and resilience, which ties directly to achievement of the CBD's 2050 Vision and the ecosystem functions and services needed by people. To highlight a specific example: a Red List of Ecosystems (A.1) assessment for coral reefs in the Western Indian Ocean (Obura et al. 2021) used data on hard coral cover, fleshy algae cover, and abundance of herbivorous fish and piscivorous fish. These are all currently listed as complimentary indicators at present, but some combination of such indicators is *necessary* to undertake RLE assessments for A.1. Since the RLE is a headline indicator, the monitoring framework or other guidance should clarify for Parties and stakeholders how such metrics should draw on ecosystem-specific metrics at the complementary level. Guidance, including on tools like MERMAID or freely available global datasets can ensure a level of consistency in these approaches, taking into account national circumstances.

3) GBF indicators for ecosystem integrity or condition require clarity: Parties agreed at CoP15 that the qualitative attributes of ecosystems are just as important as simple metrics of extent (or area protected). Goal A specifically sets the intention to maintain or enhance ecological integrity, connectivity and resilience -- all of which will be required to achieve the stated goal of a measurable increase in the extent of natural ecosystems by 2050. The current monitoring framework has a mix of metrics, some that may be useful with technical clarification and standards -- e..g, to ensure that "natural" ecosystems tracked under A.2 are truly high integrity ecosystems that deliver biodiversity and other values -- and others provide different ways to evaluate those qualitative attributes of ecosystem condition that are critical to track. WCS generally advocates for two things. First, we encourage that the monitoring framework prioritize *outcomes* where possible instead of process (for example, by using component indicators like the Ecosystem Intactness Index and similar marine indicators to more effectively measure progress against Target 1 in halting ecosystem degradation/fragmentation and land/sea-use change). Second, we encourage thoughtful examination of the different composite metrics for ecosystem integrity/condition to ensure that similar approaches are used across geographies and development contexts.

In **Annex 1**, on the following pages, we provide some specific comments for experts and Parties to consider ahead of the 25th meeting of the Subsidiary Body on Scientific, Technical, and Technological Advice (SBSTTA-25) in October 2023.

Annex I. WCS comments on the draft monitoring framework for the post-2020 GBF

GBF Goal or Target	Current headline indicator for the GBF	Summary recommendation from WCS	Additional notes and comments, including for component and complementary indicators

Goal A	**A.1 Red List of Ecosystems**
	Note: Also used for Target 1, and as optional indicators for Targets 2, 3, and 7
		WCS supports the Red List of Ecosystems, but also recommends that data on ecological integrity be incorporated into RLE assessments whenever possible, as well as development of additional work on methodologies to better capture the broad spectrum of ecological integrity or condition.	• The IUCN Red List of Ecosystems (RLE) provides an important framework for integrating data on multiple biodiversity values or metrics to assess the risk of collapse of a given ecosystem, and, by extension, aspects of its integrity and resilience. Other frameworks include the UN System of Environmental Economic Accounts Ecosystem Accounting (SEEA EA) framework.
			• RLE assessments have been carried out in different contexts, though such assessments are time consuming and require human and financial resources to complete. The updating of such assessments is not automatic, as with other global datasets that are freely available.
			• The primary concern with the RLE is that the methodology assesses, as stated above, an ecosystem's risk of collapse. It does not necessarily track changes in ecological integrity, connectivity, and resilience for different ecosystems, including in particular those *least* at risk of collapse. In fact, integrity, connectivity, etc. is not compulsory, and some RLE assessments may only examine changes in ecosystem extent. We do, however, note ongoing efforts to develop complementary indicators or indices to examine multiple dimensions of ecosystems (Rowland et al. 2019), and welcome further examination of how these or other composite metrics can use data being collected for RLE assessments.
			• Ultimately, there is strong convergence to identify an important suite of ecosystem attributes that cover both extent and integrity of ecosystems, and we will support efforts to develop global metrics or framework/composite metrics that are comprehensive in scope and feasible for all Parties.
			• **On component and complementary indicators:**
			  ○ Ecosystem-specific indicators at the complimentary level should be integrated *directly* into national reporting, but will also be used in RLE assessments; choosing comparable ecosystem-specific indicators for RLE assessments can further standardize the outcomes.
			  ○ Indicators developed that cover attributes such as integrity, connectivity and resilience, including those for peatlands, forests, and coral reefs, or across multiple ecosystems (such as the Ecosystem Intactness Index) are critical to track Goal A.
			  ○ There are redundant indicators, such as 'live coral cover" and "hard coral cover", which should be streamlined by the AHTEG.

	A.2 Extent of natural ecosystems *Note: Also used for Target 1, and as an optional indicator for Target 2.*	An indicator on the extent of natural ecosystems can be useful, however, definitions for "natural" ecosystems need to be agreed, and extent alone is far less relevant for some ecosystem types.	• This indicator relates directly to Goal A's element of a global increase in the area of natural ecosystems by 2050 (at the latest). • A key challenge will be defining 'natural' ecosystems and ensuring that complementary indices track tradeoffs and trends in other land and sea-use types. • The IUCN's relatively new Global Ecosystem Typology enables Parties to use flexible approaches at the national scale, while providing a common taxonomy that can enable global aggregation for analyses and stocktakes. This ecosystem typology may also prove useful in identifying natural vs. semi-natural or anthropogenic ecosystems, and differentiating between those that provide unique global benefits. • We also note efforts by the Science Based Targets Network to develop a baseline for natural lands (2020) for use in voluntary target setting by corporations in efforts to halt the conversion of natural lands, as well as efforts to develop a Global Ecosystems Atlas. These efforts should be brought into alignment by CoP16 to the extent possible to provide the greatest clarity and consistency for different stakeholders.
	A.3 Red List Index *Note: Di used for Target 4, and disaggregations used for Goal B, Target 2, 5, 6, 7, 9, 10, etc.*	WCS supports A.3, the Red List Index (also SDG 15.5.1).	• This metric was widely supported by Parties at CBD CoP15, and forms a key scientific pillar for evaluating national and global trends in species conservation status and extinction risk. • Key aspects to improve will be methods for 'disaggregation' by species/taxonomic group, as well as refining approaches for Red List assessments at the national and global scales. • See comments below (Target 4) regarding the IUCN Green Status of Species, which can provide complementary insights into the recovery of species -- a critical component of halting and reversing biodiversity loss.
	A.4 The proportion of populations within species with an effective population size > 500* *Note: Also used for Target 4.*	No comment from WCS.	
Goal B	**B.1 Services provided by ecosystems*** *Note: Also used for Target 11*	No comment from WCS.	
Goal C	**C.1 Indicator on monetary benefits received*** *Note: Also used for Target 13*	No comment from WCS.	

	C.2 Indicator on non-monetary benefits* *Note: Also used for Target 13*	No comment from WCS.	
Goal D	**D.1 International public funding, including official development assistance (ODA) for conservation and sustainable use of biodiversity and ecosystems** *Note: Also used for Target 19.*	WCS supports the coherence between these indicators and Target 19, but would support an indicator tracking the **biodiversity finance gap**, at national and global levels since that will be the aggregate effect of multiple targets.	• Goal D focuses on closing the gap between the means of implementation, including funding, needed to implement the GBF and those currently available, taking into account changes in harmful incentives and expenditures. • Calculating this gap requires three things at national and global scales: 1) an assessment of harmful incentives and expenditures successfully eliminated or redirected (see Target 18) an assessment of resources generated mobilized domestically and multilaterally (see Target 19); and 3) an assessment of needs at the national level (as potentially identified in National Biodiversity Finance Plans, currently missing from the monitoring framework). • Parties would identify (quantify) and report on national biodiversity finance gaps as part of the development of national biodiversity finance plans, and report on these as part of National Reports or through Financial Reporting Frameworks. • **On component and complementary indicators:** ○ Recognizing that not all Parties will generate national biodiversity finance plans, an indication of those who have would still be a welcome addition to the monitoring framework under Goal D, or potentially Target 19 (though Goal D would be better).
	D.2 Domestic public funding on conservation and sustainable use of biodiversity and ecosystems *Note: Also used for Target 19.*	A second priority indicator would be on the **alignment of financial flows with the GBF**.	• A critical element of Goal D is the collective alignment of financial flows with the Mission, Goals and Targets of the GBF. This differentiates it from specific actions across Targets 14, 15, 18, and 19 (among others). • At present, this is not accounted for in the monitoring framework, although many complementary indicators for Target 18 do address the issue of eliminating flows that are contrary to the objectives of the GBF. 18.2 could be a good proxy measure for such an alignment under Goal D.
	D.3 Private funding (domestic and international) on conservation and sustainable use of biodiversity and ecosystems* *Note: Also used for Target 19*	No comment from WCS.	

Target 1	**A.1 Red List of Ecosystems** *Note: Also used for Goal A, and as optional indicators for Targets 2, 3, and 7*	Though changes in ecosystem extent and integrity can figure into RLE assessments, standardized global approaches would benefit global stocktakes.	• WCS supports the use of the Red List of Ecosystems (see comments for Goal A), recognizing certain challenges. • Indicators for ecosystem extent and integrity, impacted by land and sea use change, should figure into RLE assessments, as one of the key pillars of ecosystem assessment: extent, integrity and risk of collapse (Nicholson et al. 2021). • By using standardized measures for extent and integrity of ecosystems, as appropriate for different ecosystem types, we can consistently track land and sea use change and the impacts of our actions to address this threat to biodiversity.
	A.2 Extent of natural ecosystems *Note: Also used for Goal A, and as an optional indicator for Target 2.*	An indicator on the extent of natural ecosystems can be useful, however, more nuanced indicators are available to measure more complex trends in high biodiversity areas. We propose using indicators such as the **Ecosystem Intactness Index**.	• As stated above, a key challenge here will be defining 'natural' ecosystems, which would indicate a high level of ecological integrity. • Defining natural ecosystems may involve the identification of thresholds, on one side of which semi-natural ecosystems with biodiversity values • A more robust indicator would track changes along a gradient of ecological integrity, which would also indicate where ecosystems have reached low enough ecological integrity to have been 'lost.' • We might therefore propose using a more nuanced indicator of human pressures on ecosystem integrity, choosing potentially among component indicators such as the **Ecosystem Intactness Index (EII)** [under Goal A] to assess the extent to which human activities are degrading, fragmenting, or altogether eliminating intact habitat. Complementary indices are available for marine areas. Parties would be free to use global datasets aggregated as part of updates to the EII, and validate them nationally, or use similar datasets and the methodology underpinning the EII to undertake spatially explicit calculations of the trends in ecosystem intactness. • **On component and complementary indicators:** ○ Using the above approach involving the EII would be a useful methodology for the proposed component indicator, **"Priority retention of intact/ wilderness areas."**
	1.1 Percent of land and sea area covered by biodiversity-inclusive spatial plans*	With no agreed methodology for this indicator, WCS believes that metrics on changes in ecosystem extent and integrity would be more useful at national and global scales.	• Parties noted at CoP15 that there is no available repository or way to measure coverage of spatial planning. • Furthermore, Parties noted that spatial planning exercises do not necessarily or successfully address the goal of this target, which is addressing land and sea use change. • However, further development of this methodology should ensure consistency by using global standards and approaches, such as the identification of Key Biodiversity Areas (KBAs).
Target 2	**2.1 Area under**	With no agreed	• Area under restoration does not necessarily indicate that such

	restoration*	methodology for this indicator, WCS recommends an indicator that focuses on the **extent of areas under restoration with positive trends in ecological integrity**	restoration efforts are successfully restoring ecological integrity or extent, and achieving biodiversity outcomes.
			• We would propose a new indicator that cross references areas reported under restoration with those areas achieving positive outcomes on extent and/or integrity, using complementary and component indicators identified below.
			• Alternatively, measures for ecological condition such as A.1 on the Red List of Ecosystems might, over the long term, be able to provide a sense of where ecosystems are being restored to reduce their risk of collapse.
			• **On component and complementary indicators:**
			  ○ We raise similar issues with the extent indicator identified at the component level, with many restoration efforts aimed at enhancing the integrity and connectivity of ecosystems with a much longer term vision to expand their extent (subject to definitions).
			  ○ We therefore believe the secondary component indicator on enhancement in the connectivity of ecosystems is important; however, we note that a methodology is not yet identified.

Target 3	**3.1 Coverage of protected areas and other effective area-based conservation measures**	WCS supports this indicator; however, we recognize that it does not necessarily capture the effectiveness of this conservation intervention.	• CBD Parties have expressed a strong desire for a headline indicator to measure the extent of area-based conservation measures, but also more qualitative aspects.
			• There has also been strong desire for an indicator to evaluate whether area-based conservation measures are *'effectively conserving and managing'* biodiversity, building on a long history of developing protected area management effectiveness indicators (as reflected in the Global Database on PAME).
			• The UK's proposal at CoP15 for an indicator building on an indicator for MPAs under the OSPAR Regional Sea Convention is important, though work is ongoing to develop this proposal further and identify how it would work with other types of PAME assessments captured in the GD-PAME.
			• **On component and complementary indicators:**
			  ○ Indicators addressing connectivity, such as ProtConn Protected Area Connectedness Index (PARC-Connectedness) are typically only aimed at terrestrial ecosystems.
			  ○ "Number of hectares of UNESCO designated sites (natural and mixed World Heritage sites and Biosphere Reserves)" could be complemented by integration of analyses conducted as part of, for example, World Heritage Outlook assessments (to look at the status of these World Heritage sites and not just coverage).
			  ○ Indicators related to equitable implementation of this target are critical. For example, "Number of countries implementing national legislation, policies or other measures regarding free,

			prior and informed consent related to conservation" is a critical complement to ensure that Target 3 and others in the framework are implemented with full respect for and protection of human rights. ○ WCS notes the use of the Red List of Ecosystems as a component indicator, which is a way to evaluate the effectiveness of area-based conservation using trends in the risk of ecosystem collapse for the ecosystems these measures conserve or are part of. There are a variety of linkages here not only to A.1/RLE, but also to the extent of of natural ecosystems and others considered on ecosystem extent and integrity under Goal A and Target 1 (see commentary above). For example, trends in forest integrity as measured through the Forest Landscape Integrity Index will also be valuable to track success in conserving forest ecosystems through protected and conserved areas. The relationship between these metrics for actions and outcomes should be explored by the AHTEG and SBSTTA-25.
Target 4	**A.3 Red list Index** *Note: Also used for Goal A, and disaggregations used for Goal B, Target 2, 5, 6, 7, 9, 10, etc.*	WCS **supports** A.3, the Red List Index (also SDG 15.5.1).	• WCS supports the use of the Red List Index (see comments for Goal A), recognizing certain challenges.
	A.4 The proportion of populations within species with an effective population size > 500* *Note: Also used for Goal A*	With no agreed methodology for this indicator, WCS would recommend developing and using the IUCN **Green Status of Species**	• The IUCN Green Status of Species, currently listed as a component indicator and undergoing a process of refinement, would be well placed, over time, to track progress towards species *recovery* and would be an excellent complement to the Red List Index, which we believe should be maintained for Goal A and Target 1.
Target 5	**5.1 Proportion of fish stocks within biologically sustainable levels**	We would propose using a disaggregation of **Red List Index (for utilized species)**, or alternative specifically for species exploited for commercial purposes *Note: Proposed as a component indicator for Goal B, and other aggregations/disaggregations are proposed for Goal A, and Target 2, 6, 7, 9, 10, etc.*	• "Proportion of fish stocks within biologically sustainable levels" covers only fish species; it does not fulfill the definition of a headline indicator. A complementary indicator does not currently exist for terrestrial species. • Rather than focus on the sustainability for a single taxonomic group (i.e., the proposed indicator on fish stocks), we propose building on consensus for the Red List Index elsewhere in the framework. We note that Goal B contains a proposal for component indicators of: Red List Index (for utilized species) Living Planet Index (for used species). These would be more valuable and could incorporate data on commercially exploited fish stocks. • **On component and complementary indicators:** ○ Inclusion of species in the CITES or CMS Appendices may be used as a complementary indicator of the unsustainability of use

			and/or trade.

		Degree of implementation of international [and national] instruments aiming to combat wildlife, forestry and fisheries crime*
		
		 Or, alternatively:
		
		 Further refine the methodology for **Proportion of traded wildlife that was poached or illicitly trafficked** [SDG indicator 15.7.1]
			• Parties must track whether illegal and/or unsustainable trade is being successfully eliminated. IUCN Red List trends for species that are commonly exploited, traded and/or trafficked is one way to do this, however we propose an additional indicator focusing on government interventions to halt and prevent illegal trade.
			• There are two ways to do this:
			  ○ A ***process*** indicator could closely mirror the design of SDG indicator 14.6.1 *"Degree of implementation of international instruments aiming to combat illegal, unreported and unregulated fishing"*), with UNODC as its custodian
			  ○ An ***outcome*** indicator could be an enhancement of the methodologies behind SDG indicator 15.7.1 *"Proportion of traded wildlife that was poached or illicitly trafficked"*), although that would rely on seizure data and CITES trade data, both of which can be incomplete (including not dealing with domestic protections) and therefore misleading -- CITES data underestimates illegal trade in all species, and seizures are a subset of illegal trade). A composite metric of seizure data and other forms of information, perhaps building on existing databases (e.g. CITES illegal trade reports), compliance mechanisms (CITES and CMS), and intergovernmentally organized assessments (UNODC wildlife crime report) could be developed by building on SDG indicator 15.7.1.

		We recommend an additional headline indicator on **Prohibitions on wildlife trade in place to prevent pandemics by reducing the risk of pathogen spillover** (binary)	• Use, harvesting and trade of wildlife could be both legal and sustainable, but may involve specific taxonomic groups, activities, or conditions that are "unsafe" -- particularly from the perspective of zoonotic pathogen spillover to humans, wildlife, or other animals that increase the risk of epidemics and pandemics. • Given the language in Target 5 on *'reducing the risk of pathogen spillover,'* it is essential that Parties report on domestic measures taken to reduce the risk of such spillover events, including through measures addressing commercial trade and markets in certain higher taxonomic groups, such as birds and mammals which are known to present a significant risk to human and animal health when traded live and marketed live or freshly slaughtered, or on issues of forest fragmentation and an increase in frontier areas. • There are linkages as well with patterns in, for example, forest or other ecosystem fragmentation or degradation, which demonstrably increases the risk of pathogen spillover to livestock or humans. Linkages with indicators for Targets 1 and 3 should be noted. • **On component and complementary indicators:** ○ There are currently no component or complimentary indicators

			to evaluate the "safe" use of biodiversity, as highlighted specifically in Target 5, making this a major gap. ○ Efforts to identify indicators for a Global Action Plan on Biodiversity and Health will help address this gap.
Target 6	6.1 Rate of invasive alien species establishment	No comment from WCS.	
Target 7	**7.1 Index of coastal eutrophication potential**	WCS would recommend instead using the **SDG indicators on wastewater treatment and water quality** [SDG indicators 6.3.1, 6.3.2, and 14.1.1]	• With the proposed indicator for 7.2 not yet developed, one option is to use existing data reported into the UN Food and Agriculture Organization (FAO) on both fertilizer and pesticide use. • Good proxy measures can include: total wastewater generated vs. total wastewater treated, proportion of open water bodies, river water bodies, and proportion of bodies of water with good ambient water quality (SDG indicators 6.3.1 and 6.3.2) and Chl-a deviations, beach litter per square kilometer, floating plastic debris density, and beach litter originating from national land-based sources that ends in the ocean (SDG indicators 14.1.1.). • There are important linkages here with changes in land use -- see the proposed additional headline indicator below.
	7.2 Pesticide environment concentration*	With no agreed methodology for this indicator, WCS would recommend framing this as **trends in use of fertilizers and pesticides**, where data is already available via the FAO.	• With the proposed indicator for 7.2 not yet developed, one option is to use existing data reported into the UN Food and Agriculture Organization (FAO) on both fertilizer and pesticide use. • This data is already being collected, so it will not impose additional data collection requirements on countries, and it can speak to pollution trends over time/the potential for pollution (i.e., the fertilizer and pesticide use).
		We propose an indicator examining **trends in the extent of agricultural lands/areas**.	• One key gap in the monitoring framework is trends in the extent and distribution of agricultural areas. As a key driver of land-based pollution in coastal environments, we flag this here in Target 7, though it is hugely relevant to Goal A, Targets 1, 3, 10, and more.
Target 8	*No headline indicator identified.*	With no agreed indicator for this Target, WCS recommends an global indicator tracking the **trends in the extent and integrity of high carbon ecosystems**	• We recognize concerns from Parties about quantitative mitigation targets being developed and adopted under the CBD, given the role of the UNFCCC and the Paris Agreement in guiding international cooperation on climate change mitigation. However, the CBD does certainly have expertise and competence in measuring ecosystem extent and integrity. One disaggregation of Goal A indicators could look at the extent and integrity of certain carbon-rich ecosystem types. • A more direct way to frame this, in terms of an indicator, would be to track global carbon stocks (both above and below-ground) within

			such ecosystems.
		A second, more flexible indicator would be **trends in national climate commitments, strategies and plans that are consistent with and reinforce biodiversity goals** in national strategies and action plans	• Many Parties have sought to identify synergies between multilateral efforts to address biodiversity loss and climate change. • A metric of whether countries are actively including biodiversity within mitigation commitments (such as nationally determined contributions) or within adaptation commitments or communications (e.g., National Adaptation Plans), would be an essential first step to see if national leads for climate and biodiversity are working together to plan for nature-based solutions to climate change. This information is already publicly available, and provides a basis for further analysis, discussion, and potentially cooperation between the two multilateral environmental regimes.
Target 9	**9.1 Benefits from the sustainable use of wild species***	With no agreed methodology for this indicator, **National environmental- economic accounts of benefits and negative impacts affecting different sectors of society,** especially the most vulnerable, and indigenous peoples and local communities, as a result of changes in the stocks and flows of wild species.	• Significant capacity building will be needed in many countries to ensure all relevant information is collated and analyzed. The proposed indicator would move the SEEA in that direction, though there remains uncertainty as to how this would unfold. • In addition, there is no methodology within SEEA to differentiate wildlife uses by type of users (Indigenous Peoples or local communities), which introduces further complications. In order to introduce protection to Indigenous Peoples and local communities, the distinction by type of user should be included in accounts. • Accounts should capture both benefits from the sustainable use of wild species, as well as negative (perhaps unintended or cumulative impacts).
	9.2 Percentage of the population in traditional occupations*	With no agreed methodology for this indicator, WCS **does not support** 9.2.	• WCS does not believe this indicator provides valuable feedback on either the conservation or sustainable use of biodiversity.
Target 10	**10.1 Proportion of agricultural area under productive and sustainable agriculture**	WCS would recommend a revision of this to include **proportion of [agricultural] [productive] areas with targeted environmental safeguards for biodiversity**	• We support the proposed formulation, provided during SBSTTA-24, as a modifier to the originally proposed headline indicator for two reasons. • First, it addresses a wider variety of productive ecosystems, which could include, for example, aquaculture. • Second, it alludes to a specific intervention of targeted biodiversity safeguards (we would amend it to focus on nature-positive safeguards to add greater specificity and link it to language being discussed in the context of goals and targets).

		We propose an indicator examining **trends in the extent of agricultural lands/areas**.	• One key gap in the monitoring framework is trends in the extent and distribution of agricultural areas. This was flagged in regards to Target 7.
	10.2 Progress towards sustainable forest management	No comment from WCS	
Target 11	**B.1 Services provided by ecosystems*** *Note: Also used for Goal B*	No comment from WCS	
Target 12	**12.1 Average share of the built-up area of cities that is green/blue space for public use for all (SDG 11.7.1)**	No comment from WCS	
Target 13	**C.1 Indicator on monetary benefits received** *Note: Also used for Goal C*	No comment from WCS.	
	C.2 Indicator on non-monetary benefits *Note: Also used for Goal C*	No comment from WCS.	
Target 14	*No headline indicator identified.*	With no agreed indicator for this Target, we would recommend an indicator on the **proportion of countries with legislation/regulation mainstreaming biodiversity, and mandating outcomes consistent with the GBF, at all levels, by sector,** including those that require outcomes aligned with the GBF.	• We recommend further considering this indicator proposed during SBSTTA-24, which would look at national legislation and regulation • This would rely on a combination of binary and qualitative reporting by Parties, which could be guided by amendments to the national reporting template. • Reporting would need to break down questions by sector to achieve the disaggregations necessary to track progress on mainstreaming (and the LTAM) for each mainstreaming area. • Proportion of countries which have assessed their existing legislation to identify gaps and opportunities for mainstreaming biodiversity at all levels, by sector. • **On component and complementary indicators:** ○ An additional indicator could be *"Proportion of countries which have assessed their existing legislation to identify gaps and opportunities for mainstreaming biodiversity at all levels, by sector."*

Target 15	**15.1 Number of companies reporting on disclosures of risks, dependencies and impacts on biodiversity***	With no agreed methodology for this indicator, WCS supports an indicator, at least at the component level, of **national or jurisdictional requirements** for reporting on risks, dependencies and impacts on biodiversity.	• We welcome the voluntary efforts of individual companies to report on their risks, dependencies and impacts on biodiversity. • However, with no agreed methodology or custodian, it may make more sense for governments to report, where relevant, on national legislative and regulatory action to require such disclosures. • We welcome the work developed by TNFD, SBTN and Align, as they are science-based frameworks developed through multi-stakeholder processes and encourage Parties to invest in further developing these.
Target 16	*No headline indicator identified.*	No comment from WCS	
Target 17	*No headline indicator identified.*	No comment from WCS	
Target 18	**18.1 Positive incentives in place to promote biodiversity conservation and sustainable use**	WCS supports this indicator, though recognizes potential perverse consequences and would recommend a focus on 18.2.	• This indicator can provide an important indication of where governments have placed incentives for biodiversity conservation, including redirections from previous harmful incentives, and using USD or other common currencies can allow for global aggregation in global assessments of the biodiversity finance gap. • However, we note that incentives for sustainable use should always emphasize the *sustainability* of use, so that the harmful incentives, including subsidies that Parties are currently eliminating in the context of, for example, fisheries, are not included here.
	18.2 Value of subsidies and other incentives harmful to biodiversity that have been eliminated, phased out or reformed	WCS strongly **supports** this indicator.	• We believe that it should focus on the USD or other financial value of harmful incentives eliminated, in order to generate a common currency with which to aggregate and scale assessments towards the global figure identified in draft Target 18. • Parties should avail themselves of guidance from the OECD and other best practices for the identification of harmful subsidies to ensure that all such incentives are captured.
Target 19	**D.1 International public funding, including official development assistance (ODA) for conservation and sustainable use of biodiversity and ecosystems** *Note: Also used for Goal D*	No comment from WCS (WCS supports this indicator).	

	D.2 Domestic public funding on conservation and sustainable use of biodiversity and ecosystems *Note: Also used for Goal D*	No comment from WCS (WCS supports this indicator).
	D.3 Private funding (domestic and international) on conservation and sustainable use of biodiversity and ecosystems* *Note: Also used for Goal D*	No comment from WCS (WCS supports this indicator).
Target 20	*No headline indicator identified*	No comment from WCS
Target 21	**21.1 Indicator on biodiversity information for the monitoring the Kunming-Montreal Global Biodiversity Framework**	No comment from WCS
Target 22	*No headline indicator identified*	No comment from WCS
Target 23	*No headline indicator identified*	No comment from WCS