

**Template for submission of scientific and technical comments on Appendix 1 of the recommendation adopted by the Subsidiary Body on Scientific, Technical and Technological Advice for the Resumed Session of its twenty-fourth meeting**

**TEMPLATE FOR COMMENTS**

<b>Review comments on Appendix 1 of the present recommendation</b>	
<b>Scope of this template for comments</b>	Template for submitting comments in accordance with recommendation CBD/SBSTTA/REC/24/2, paragraph 2, where the Executive Secretary of the Convention on Biological Diversity (CBD), under the guidance of the Bureau of the Subsidiary Body on Scientific, Technical and Technological Advice (SBSTTA), invites Parties, other Governments and relevant stakeholders to submit views on Appendix 1 of the recommendation.
<i>Contact information</i>	
<b>Party/Government/Observer</b>	Party
<b>Party/Government/Observer representative</b>	Germany
<b>Comments</b>	
Please provide any general comments on the Appendix 1.	
<p>This very helpful annex provides a good overview of the state of development of the Monitoring framework of the GBF but also makes clear that now – after more than 2 years of delay by Corona and lengthy discussions – much more speed is needed. However, the proposed list of indicators still lacks process-oriented indicators with which to measure the effectiveness of the policy instruments used for the implementation of the GBF. This has already been addressed in the German national discourse (e.g. <a href="https://www.ufz.de/nefo/index.php?de=49383&amp;nopagecache">https://www.ufz.de/nefo/index.php?de=49383&amp;nopagecache</a>, in German only), but has hardly found its way into the drafts of the GBF so far. Additionally, it would be very helpful, to establish a mechanism for a timelier monitoring of the progress made. Suitable proposals for this can be found in an IDDRI discussion paper (Landry et al. 2022, see <a href="https://www.iddri.org/sites/default/files/PDF/Publications/Catalogue%20Iddri/Etude/202203-ST0322-post2020review.pdf">https://www.iddri.org/sites/default/files/PDF/Publications/Catalogue%20Iddri/Etude/202203-ST0322-post2020review.pdf</a>). (Also relevant for discussion under SBI-3 AI9) Finally, it is worrying that in many metadata sheets it is proposed to use the SCBD to collect or compile data for the indicators ("information could be collected by the Secretariat of the Convention on Biological Diversity"). This is not conceivable in view of the heavy workload implied. We therefore wonder whether this task would need to be delegated to another entity (see also general comments on the structure of the metadata). Comments on proposed changes to specific indicators: 3.: Some Complementary Indicators might be upgraded to the Component Indicator level (e.g. t.3.5 IUCN Green List of Protected and Conserved Areas, t.3.11 Number of protected areas that have completed a site-level assessment of governance and equity (SAGE)), since equity issues are included at the level of Complementary Indicators only, even if equitable management is a key component of Action Target 3. 7.0.3: If “most hazardous“ is to be</p>	

included in the Headline Indicator, it needs a sound definition based on the impacts of pesticides on biodiversity.