

Template for submission of scientific and technical comments on Appendix 2 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

Review comments on Appendix 2 of the present recommendation	
Scope of this template for comments	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 2 of the recommendation.
Contact information	
Party/Government/Observer	Observer
Party/Government/Observer representative	CDC Biodiversité (CDC Biodiversité is not formally an Observer. CDC Biodiversité is a subsidiary of the Caisse des dépôts et consignations, the largest French public financial institution. CDC Biodiversité is a French consulting & engineering firm specialized in positive actions for biodiversity, biodiversity sustainable management (biodiversity offsets), and the measurement of corporate biodiversity footprint in particular through the Global Biodiversity Score.)
Comments	
Please provide any general comments on the Appendix 2.	
<p>The Mean Species Abundance (MSA) is identified on page 11 as a complementary indicator (a.43) for Goal A. It is not however identified as a possible headline indicator for Goal A in table 1 (page 39) of Appendix 1. Considering its properties, MSA has much potential as a metric: it is sensitive to change, easy to interpret (0-100 % scale), can be globally assessed based on pressure-impact relationships from the GLOBIO model (1, 2), and is regularly used in scientific studies (3–6) and international outlook studies for the Living Planet Report (7), IPBES (8) and the CBD (9). A first estimate of the global planetary boundary for functional biodiversity has been estimated using MSA: it stands at 72 % (10). Using MSA could thus potentially facilitate negotiations by providing an indication of the level to aim for (similarly to the 1.5°C-2°C for climate). The MSA is also used in several biodiversity impact assessment tools. Examples include the Global Biodiversity Score (GBS) (11), launched in May 2020 by CDC Biodiversité to assess the biodiversity footprint of companies and financial institutions; the Biodiversity Impact Metric (BIM) developed by the University of Cambridge Institute for Sustainability Leadership (CISL) to measure the impact of commodity supply chains (12); and the Biodiversity Integrated Assessment and Computation Tool (B-Intact) developed by the FAO, to assess the impact on biodiversity of projects in the Agriculture, Forestry and Other Land Use sector (13).</p>	

We thus believe that MSA would be valuable as a headline indicator for Goal A. Furthermore, MSA is not identified as a possible headline indicator for Target 15 in table 2 (page 49) of Appendix 2. CDC Biodiversité suggests as a headline indicator: “Condition in MSA (mean condition) and extent in km² of ecosystems impacted by businesses, split between direct operations, upstream and downstream”. Indeed, MSA is already identified as a complementary indicator in Appendix 1 (a.43). Since in practice, MSA is difficult to produce for businesses, we wish to suggest “Condition-weighted business direct operations, upstream and downstream impacts (MSA.km²)” as a headline indicator for Target 15. This indicator is already available at the country level through GLOBIO-IMAGE produced by the PBL (Dutch environmental agency), and which is for example used in Global Biodiversity Outlooks (9). The metric is also used by most financial institutions (through the CBF and BIA-GBS databases) assessing their biodiversity footprint and transition risk and by a number of corporates (e.g. through the GBS tool). 1. R. Alkemade et al., *Ecosystems*. 12, 374–390 (2009). 2. A. M. Schipper et al., *Glob Change Biol*. 26, 760–771 (2020). 3. D. Leclere et al., “Towards pathways bending the curve terrestrial biodiversity trends within the 21st century” (International Institute Of Applied System Analysis, 2018). 4. D. Leclère et al., *Nature*. 585, 551–556 (2020). 5. H. C. Wilting, et al., *Environ. Sci. Technol*. 51, 3298–3306 (2017). 6. H. C. Wilting, M. M. P. van Oorschoot, *Journal of Cleaner Production*. 156, 194–202 (2017). 7. R. E. A. Almond, et al., *Living Planet Report 2020: bending the curve of biodiversity loss* (2020). 8. M. Rounsevell, *The regional assessment report on biodiversity and ecosystem services for Europe and Central Asia* (IPBES, Bonn, 2018). 9. Secretariat of the CBD, “Global Biodiversity Outlook 5” (Montreal, 2020). 10. P. L. Lucas, H. C. Wilting, (2018), doi:10.13140/RG.2.2.15143.80806. 11. CDC Biodiversité, “Measuring the contributions of business and finance towards the post-2020 global biodiversity framework, 2019 technical update” (Paris, France, 2020). 12. CISL, “Measuring business impacts on nature: A framework to support better stewardship of biodiversity in global supply chains” (CISL, Cambridge, UK, 2020). 13. FAO, *B-INTACT: guidelines - second edition*. (FOOD & AGRICULTURE ORG, S.I., 2021).

Regarding the list of proposed alternative or additional headline indicators for Target 15 in table 2 (page 49) of Appendix 2, CDC Biodiversité would like to submit comments on certain indicators:

- “Dependencies and impacts of businesses on biodiversity and related human rights”: this is very broad, and both MSA and MSA.km² are specific indicators to track impacts of businesses on biodiversity.
- “Ecological footprint”: this is not used by companies and is not directly related to biodiversity.
- “Extent of natural vegetation/terrestrial ecosystems converted due to commodity/soft production”: we believe it is more relevant to directly measure condition-weighted impact in MSA.km² (and to cover the whole value chain, not just commodity production).
- “Indicator on dependencies, impacts, risks, and opportunities from the Taskforce on Nature-related Financial Disclosures (TNFD)”: as for the indicator mentioning dependencies above, this seems too broad. Furthermore, at this stage, the TNFD does not suggest metrics or indicators.
- “Number of companies assessing and reporting on their net impact on biodiversity”: we believe the word “net” is not useful here: companies should report separately on their negative and positive impacts.

- “Number of companies publishing sustainability reports”: this seems too broad.
- “Number of production sectors in each country that use biodiversity includes certification schemes or biodiversity practice guidelines”: this does not seem to be what is needed to achieve a 50 % reduction (it would be insufficient).
- “Policies and measures in place that prevent and regulate impacts on biodiversity and biodiversity related human rights.”: this seems too broad.
- “Proportion of total revenue, of business (a) assessing and disclosing material biodiversity impacts and dependencies of their operations and supply chains through quantitative metrics; (b) having set science-based targets for nature; and (c) having set science-based targets for climate”: the mention of science-based targets for climate does not seem necessarily relevant here. Furthermore, the proportion of total revenue/of business is interesting but seems hard to achieve in practice (the number of businesses may be easier to quantify).