

Thank you for the opportunity to comment on the Strategic Plan PREP/2 document. The structure and approach taken by the Secretariat to the new Strategic Plan is sound and needed. Many elements needed to ensure movement towards a steady state for sustainability of our BioDiversity are evident in the PREP/2 document.

The comments below reflect the members of the BioDiversity caucus (BDC) steering committee of the Canadian Environmental Network, and are submitted by individuals with affiliations from four organizations which are members of the Canadian Environmental Network. submitted on behalf of four organizations. The BDC looks forward to continuing to work with the Secretariat for the Convention on Biological Diversity and to engaging our communities in 2010 – the International Year for Biological Diversity. Please do contact us if you need any clarity or want to further discuss any suggestion included in these comments. Additionally, we are seeking to participate in the Strategic Plan development in a more robust fashion and would like to know more about how we can further involve our caucus. Please let Sarah Hieberg ([sarah@cen-rce.org](mailto:sarah@cen-rce.org)) at the RCEN know how this could occur.

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*Comments*

**DOCUMENT/CBD/SP/PREP/2 (NOVEMBER 30 2009)**

Page	Line or Para	Comment												
0	0	Biodiversity, climate change and human rights interlinked. This should be underscored in the Strategy.												
0	0	In some instances perhaps the activities or indicators should help to develop the target. Maybe define what you want to measure and turn this into the target?												
0	0	<p>The four systems conditions of The Natural Step could be considered as targets. The four system conditions are</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><b>The Four System Conditions...</b></th> <th style="text-align: left;"><b>. . . Reworded as The Four Principles of Sustainability</b></th> </tr> </thead> <tbody> <tr> <td>In a sustainable society, nature is not subject to systematically increasing:</td> <td>To become a sustainable society we must...</td> </tr> <tr> <td>1. concentrations of substances extracted from the earth's crust</td> <td>1. eliminate our contribution to the progressive buildup of substances extracted from the Earth's crust (for example, heavy metals and fossil fuels)</td> </tr> <tr> <td>2. concentrations of substances produced by society</td> <td>2. eliminate our contribution to the progressive buildup of chemicals and compounds produced by society (for example, dioxins, PCBs, and DDT )</td> </tr> <tr> <td>3. degradation by physical means</td> <td>3. eliminate our contribution to the progressive physical degradation and destruction of nature and natural processes (for example, over harvesting forests and paving over critical wildlife habitat); and</td> </tr> <tr> <td>4. and, in that society, people are not subject to conditions that systemically undermine their capacity to meet their needs</td> <td>4. eliminate our contribution to conditions that undermine people's capacity to meet their basic human needs (for example, unsafe working conditions and not enough pay to live on).</td> </tr> </tbody> </table>	<b>The Four System Conditions...</b>	<b>. . . Reworded as The Four Principles of Sustainability</b>	In a sustainable society, nature is not subject to systematically increasing:	To become a sustainable society we must...	1. concentrations of substances extracted from the earth's crust	1. eliminate our contribution to the progressive buildup of substances extracted from the Earth's crust (for example, heavy metals and fossil fuels)	2. concentrations of substances produced by society	2. eliminate our contribution to the progressive buildup of chemicals and compounds produced by society (for example, dioxins, PCBs, and DDT )	3. degradation by physical means	3. eliminate our contribution to the progressive physical degradation and destruction of nature and natural processes (for example, over harvesting forests and paving over critical wildlife habitat); and	4. and, in that society, people are not subject to conditions that systemically undermine their capacity to meet their needs	4. eliminate our contribution to conditions that undermine people's capacity to meet their basic human needs (for example, unsafe working conditions and not enough pay to live on).
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		Ref <a href="http://www.naturalstep.org/the-system-conditions">http://www.naturalstep.org/the-system-conditions</a>
0	0	Linking the Target and Indicators to Strategic Goals is an excellent strategy. It is hoped that the intent and specific wording of these strategic goals <b>will be at the core</b> of the upcoming discussions. Getting these Strategic Goals “right” will clearly have a major impact on choosing the right Target and Indicator to monitor the adequacy of the protection of biodiversity and those factors associated with it.
0	0	Several of the “Suggestion(s) for Smart Target(s)” (or really Strategic Objectives under the appropriate Strategic Goal) could be simplified by removing reference to how the goal could be accomplished. Simplification will improve comprehensibility. For example, suggested target 2 could be rewritten to include only the first part of the sentence down to “reflected in all countries.” with the examples of activities that should be carried out to support the target being places in the second column of the Table annex (“Means and example activities”). To further simplify the suggested targets it would be desirable to include another column in the annex table identifying the sectors to which the target applies – e.g., businesses, civil society, local government, state/provincial government, national government.
0	0	One problem that continues to exist with respect of biodiversity targets is the seeming paucity of information on the core concern – what species and ecosystems are at risk or threatened by extinction, where are they located and what will be the impact of their demise. This is a principle indicator of success or failure. In a very real sense, it is comparable to life expectancy as an indicator for human systems. Certainly more than one Target and Indicator (namely No. 12) should bear on this principle issue. For example, inclusion of separate indicators, as possible, for species that are extirpated, endangered, threatened, or of special concern (as is the case in under the Canadian Species at Risk Act) should be encouraged. Smart targets, similar in concept, should be encouraged for ecosystems with categories such as original ecosystem destroyed, is endangered, is threatened, or of special concern for some other reason. Even if society is doing the right thing with respect to processes with respect to biodiversity preservation, we will collectively fail if this principle indicator continues to deteriorate.
0	0	Many things related to biodiversity pertain to phenomena that are non-qualitative. Although some elements of this value can be tapped through population opinion surveys, many of the most compelling stories and insights cannot be quantified and are only the result of qualitative research. For example, the aesthetic value of biodiversity to mankind and aboriginal peoples knowledge pertaining to biodiversity. Although it can be argued that qualitative indicators may be more subject to error and less scientific than quantitative indicators, social scientists have developed approaches to explore questions not readily dealt with by quantitative methods. More attention should be paid in the strategic plan to use qualitative research methods to develop qualitative indicators of progress.
0	0	Another aspect of the qualitative assessment is the collection of stories from member nations of both successes as well as failures in programs implemented to support each Smart Target. Sharing of such information can be a powerful driver of change, showing what positive, high pay-off initiatives can be undertaken and which initiatives have been tried and found wanting.
0	0	We have concerns that a reductionist approach to indicators, while necessary in many cases, may not be appropriate to measure the overall health and cohesion of BioDiversity at a systems level. A conservation or system biology approach needs to be included in order to protect and move biodiversity towards a steady and sustainable state. The value of measures to consider abundance, distribution and balance of species cannot be understated. In considering the Strategic Plan through this type of lens, there is a need to create and include a target or targets, as well as associated indicators that measure and improve ecosystem health and resilience.
0	0	Consideration should be given to regulations relevant to protocols and discussion of new international regulations within the 10 year strategic plan.

0	0	Once the Strategic Plan is approved, there needs to be an exercise that will turn the document into a common language or layman's document in which plain language is used to help in the communications and outreach efforts. A good example of a comparable document is Michael Keating's "Agenda 21 – A Plain Language Version of Agenda 21 and Other Rio Documents" <a href="http://www.iisd.org/rio%2B5/agenda/default.htm">http://www.iisd.org/rio%2B5/agenda/default.htm</a>
0	0	The strategic plan needs to emphasize the concept of ecological value/natural infrastructure value in a more focused and enhanced approach.
0	0	There needs to be more emphasis in vision and mission on Access and Benefit Sharing and Traditional Knowledge.
0	0	A mechanism, or consideration, needs to be included to formalize participation from sub national government levels needs to be considered as in some cases, sub national government policy has more impact on BioDiversity than that of National policy.
0	0	Targets should be included for water and urban areas
3	Para 2	Line 1 . We believe that there is an error in this line in that the line should read "The purpose of the strategic plan.." should read 2011. In the document it is 2010
3	Para 8	Issues speak to the progress in Environmental Impact Assessments (EIA). There have also been set backs in some countries, such as Canada and the United States.
4	Para 7	In entry point (b) an inclusion of both the Precautionary Principle, and the impacts of resource exploitation is warranted.
4	Para 7	An additional entry point that is specific to, and enhances, integration of Traditional Knowledge and western science, as well as Access and Benefit Sharing is needed. Including an entry point in this vein will create a more cohesive and contemplative approach to the Convention on Biological Diversity (CBD) within the context of the Strategic Plan. Additionally, this entry point is needed to ensure broad based understanding and uptake of the third goal of the CBD.
5	Para 3	Vision should include the following 1) BioDiversity is recognized as the basis for our societal, cultural and economic systems 2) BioDiversity is the basis or foundation for all life
5	Para 4	Phrase should include the concept of BioDiversity being the basis for all culture/soci and economic systems. Suggested wording could be " Living in harmony with nature , BioDiversity is understood to be essential to delivering benefits essential for all people and species, and BioDiversity is conserved, restored and widely used to ensure a healthy sustainable planet into the future".
6	Last bullet	Mission -Last bullet modified to "To overcome the implementation deficit (ie the widening gap between northern and southern countries) by ensuring that all countries have the means to achieve the mission statement" There also needs to be inclusion of the country gaps between rich and poor (i.e. Aboriginal communities in Canada can be considered to be living in developing country conditions to some degree and in some instances). It is recommended that the implementation deficit be recognized as not only a North South divide but more generally between rich and poor in any give country. If it is not possible to rewrite this bullet, the inclusion of a bullet that reflects the sentiment is warranted.
6	Add bullets	To reflect suggested additions to Vision – see page 5 para 3 comments above.
6	Para 3	Suggested wording for mission statement " To stop the loss of BioDiversity and reverse ecosystem degradation by 2020. This is done through engagement at all levels and with all sectors of society and through access of the means to achieve it"
7	Section IV	SMART Targets: There needs to be an understanding between what a SMART target and a normal target are. While well articulated, it is not clear if only SMART targets will be considered. It is recommended that the concept of direction for targets be included where possible. The targets do have good relationship to a timeframe, but there are few targets (Targets 5, 11 and 20) where a quantifiable number (i.e. Target 20 language has "a ten fold increase") is incorporated in the target. We recognize that countries are not always comfortable with a fixed number but feel that this is an

		<p>important inclusion if we are truly to measure how well we are doing.</p> <p>The Target and Indicators, modest in many cases, must be more than “aspirational targets”. Given the gravity of the situation that we face, these are “targets of necessity” rather than of hope or ambition. It is strongly recommended that some other, more forceful word be used rather than “aspirational”.</p> <p>Although nations should be allowed flexibility in collection of Target and Indicators, there should be a core set of indicators that all nations collect data for. For example, this would include the principle Target and Indicators on species and ecosystems at risk.</p> <p>The targets also need indicators at various levels of aggregation. For example, species that cross countries in terms of migration sh/could be assessed in common ways to come to a uniform and common conclusion concerning their status. Examples of species that could act as country conveners include the American Eel, Migratory Bird Species, Monarch Butterflies and Fish species. By using a species that has different geographical locations as part of its life cycle, we could better work cross boarder to support and ensure a cohesive global approach to the strategic plan. In considering targets through a species lens, other United Nation conventions could easily be brought into play (i.e. CITES, Migratory Bird Convention, Ramsar).</p>
8	Para 4	<p>Target 1 “Everyone is aware of the <b>need</b> and value of biodiversity ....” A suggested target number could be 55% of the countries population ?</p>
8	Para 5	<p>In considering education and communications, strategies for formal, non formal and informal outreach and engagement need to be included. Also civil society actors, including faith based, indigenous, labour, woman, youth and children, and, not for profits organizations have a strong and vital role to play in enabling global community and should be included in the rationale section.</p>
8	Para 6	<p>Target 2 tries to include too much into it. It should be broken down into more than one target to clearly identify what is to be achieved.</p>
10	Para 5	<p>Target 7 states “...according to sustainability criteria”. Without clear articulation of what the criteria are there is little meaning to the target.</p>
10	Para 7	<p>Target 8 needs to be broader to include all types of pollution especially man made chemicals that ecosystems do not know how to deal with.</p>
11	6	<p>Goal should be broader than climate change to include other ecosystem services and capture ability to look at Natural Infrastructure and Payment for Ecological Services</p>
11	Para 2	<p>Target 9 should include something to address reduction of existing invasives</p>
11	Para 7	<p>Line 3. Insert “species recovery programmes, <b>land use planning approaches</b>, and other targeted conservation...</p>
11	Para 7	<p>Line 4. Include indigenous communities</p>
12	Para 3	<p>Target 12 needs to include reference to more common species not declining in numbers or range.</p>
14	Line 6	<p>... and the main elements of <b>their</b>... spelling error in that the word used is there instead of their</p>
14	Line 9	<p>Better guidance needs to be given for when regional and sub national strategies should be developed. It is our opinion that all developed countries should have sub national strategies.</p>
16	Line 11	<p>Synergies between all Multilateral Environmental Agreements should be considered. We recommend that among the MEAs considered of particular importance, Ramsar is critical to proper and robust enhancement of CBD and its’ strategic plan.</p>
17	Para 4	<p>Initiatives to enhance cooperation must include a sub national mechanism</p>
17	Para 5	<p>A Support Mechanism should be considered for lay people engagement in monitoring – there is a potential to have millions of eyes for BioDiveristy watching the landscape.</p>
17	Para 6	<p>A plan/framework of implementation needs to be developed to assist countries and civil society actors needing help to mainstream and enable this strategy. A generic framework would ensure wide spread engagement especially for lay man looking to engage is doing their part for the future of the planet.</p>
18	Para 1	<p>In considering the final calendar of meetings, the Secretariat should consider convening during the Commission for Sustainable Development (CSD) meetings held annually in New York. This would give ample opportunities to help ensure BioDiversity is integrated in the work of the CSD and also give opportunity to share information, host side events and workshops relevant to BioDiversity with the thematic cluster of the cycles of the CSD.</p>

*ANNEX 1*

0	0	The Framework presented in Annex 1 has a well developed structure that is logical and has a solid connecting paradigm. It would be useful to include a feedback mechanism by which to monitor if the indicator is actually moving towards the target. As we feel there is still work to do to develop laudable and meaningful targets, we will not be making many specific comments relevant to the targets themselves but will focus on higher order comments around the elements of the framework.
0	0	<b>Suggestions for SMART Targets</b> The framework should make reference to <b>Suggestions for Targets</b> in column 1. The omission of the term SMART may be beneficial to add clarity in the table. The concept of a SMART target still needs clarity and further explanation. Additionally, the term may “scare off” good work or efforts and there may be some useful and appropriate targets that do not meet the criteria outlined in the document and are therefore abandoned as they are missing a component of the SMART criteria.
0	0	<b>Means and Examples of Activities.</b> There should be a set of activities that are required by all countries so as to be able to compare “apples to apples” across all countries. The approach in the Little Green Data Book from the World Bank could be a model for the required activities.
0	0	<b>Possible Indicators.</b> Where possible and appropriate, qualitative indicators should be identified and included. Perhaps an approach that lists an extensive suite of indicators, which reflect different sections of the goal could be brought forward with the idea that x amount of indicators from the suite should be used.
0	0	<b>Most relevant CBD programmes of work and cross-cutting issues.</b> Perhaps an analysis should be made of the programmes and cross cutting issues that interact or influence or work in synergy with the CBD should be preformed. From this analysis, the next step would be to prioritize and “match up” Targets with the outcomes of the analysis. Further development of activities and indicators could follow so that there is more cohesion between the CBD and other UN activities. By endeavoring to undertake this type of analysis, the mainstreaming of BioDiversity within a UN context would be realized. This type of analysis would also underscore the importance of BioDiversity to all aspects of the work of the UN.
0	0	<b>Possible Synergies and Partnerships.</b> It is recommended that an exhaustive list of actors/agencies be included in the possible synergies and partnerships column. For example, Goal A partnerships and synergies can easily include NGOs, Women, Youth and Children, Indigenous People, Faith Based groups, Educators and Labour. This column can act as a key for Governments and Civil Society to seek to work cross sector with non traditional partners. A similar approach to that of Partnerships (Type I and II) within the context of the CSD may be a valuable exercise for the CBD to mirror. The architecture for the approach should be easily accessed by the CBD. An approach like this could allow for more resources to flow between actors.
0	0	<b>Examples of Existing National Biodiversity Target.</b> It is the expectation that this will not form part of the final framework. However, perhaps an exercise that seeks to collect and present all the targets countries are working towards would be a valuable exercise, and also act as an idea bank for others.
19	Target 2	This target is very dense and needs to be unpacked so as to be more meaningful. More than one target should be developed from this target.
25	Target 18	This target is confusing in its language and is a good example of where a smart target may not be appropriate. In considering activities and indicators that could reflect a target relevant to Traditional knowledge, the maintenance and restoration of ceremonial and cultural significant species to a sustainable level would be a laudable and appropriate inclusion. This could actually be a Target. A natural synergy and partnership for this target is the Human Rights Commission. The comments made in this section are also relevant, to a large degree, to target 17.

