

Comments on Possible Outline and Elements of the New Strategic Plan

Submission by Canada – January 2010

General comments

Canada finds in general that the draft Strategic Plan and proposed targets cover the three objectives of the Convention in a balanced manner, building on the strategic goals and objectives in the existing Strategic Plan (decision VI/26) and the associated framework of focal areas, goals, targets and indicators in decisions VII/30 and VIII/15.

We are pleased that elements from Canada's previous submission were incorporated in the draft Plan, including greater emphasis on the role of biodiversity in climate adaptation and human health, mainstreaming, and communication.

The draft Plan has 20 individual targets. While biodiversity is complex and multi-faceted, we believe that this is the absolute maximum number of targets that should be considered. Any proposals for additional targets should be accompanied by proposals for deleting some of the targets currently proposed.

While recognizing the desirability of targets that are both "ambitious" and "realistic", we note that there is a trade-off between these, and that some targets lean too far in Canada's view toward the ambitious side. Our specific comments on individual targets are offered in the spirit of providing options for greater clarity of wording, a more logical structure, greater focus, or more realism. In this submission we are not taking policy positions on any of the targets, although we have proposed a number of wording changes.

It is helpful that a "technical rationale" has been prepared for each proposed target. We are suggesting revisions to several of the targets, and we note this may also require revisions to the technical rationales.

We are not commenting in detail on the Annex containing the *Framework of Targets, Activities and Indicators for Implementation and Monitoring* at this time, as it is only "an early draft... for illustrative purposes." However, we find the examples of activities, possible indicators, most relevant CBD programmes of work, and possible synergies and partnerships useful in assessing the degree to which each of the proposed targets is "SMART" - strategic, measurable, ambitious, realistic and time-bound. Although the column of "Examples of existing national biodiversity target" illustrates the wide variety of approaches in different countries, we suggest that it be removed because these existing national targets were created in advance of the suggested new targets and could not have been informed by them.

This draft provides limited discussion of inland water ecosystems. As they are extremely important for human well-being, affected by all the main direct drivers of biodiversity loss, and by threats to terrestrial ecosystems, one option might be to highlight the relevance of an ecosystem approach for maintaining healthy inland water ecosystems.

While proposed target 19 addresses improved knowledge of biodiversity (status and trends, functions, value, etc.) and sharing of technologies, the prospects for achieving many targets (e.g., 4-15) would be increased by enhanced scientific research, technology development, and monitoring capacity; and by strengthening the science-policy interface for biodiversity and ecosystem services. For example, encouraging research and technology to reduce impacts of ocean acidification - over and above reducing atmospheric carbon dioxide levels - could help achieve target 10. Opportunities for an enhanced role of science and

technology in achieving the targets should be identified and incorporated in the Annex and technical rationales.

Specific comments

P. 4 – Before “It is clear that the 2010 Biodiversity Target will not be achieved...,” we suggest adding “Despite these successes...”

P. 4 – Note typo (“Determined action to value and protect biodiversity diversity...”)

P. 4-5 – We propose shortening the section entitled “The Issues” and adding sub-headings to this section. For example, the current Strategic Plan (decision VI/26) has sub-headings dealing with “threats”, “achievements”, and “challenges”. We suggest that “The Issues” section of the new Plan conclude with three sub-sections: “The achievements”, “The challenges” and “The opportunity”. This could be done with only slight modifications to existing text. A final sub-section on “The opportunity” could start with the paragraph that begins “On the other hand, scenario analysis reveals a wide range of options for addressing the crisis.” We suggest deleting that sentence and beginning with the next one, “Determined action to value and protect biodiversity diversity [sic] will benefit people in many ways, including through better health, greater food security and less poverty.” We suggest deleting the paragraph that follows, beginning with “Achieving this positive outcome requires action at various levels...” While this is true, this gets away from “The issue” and into “actions” which might be better captured under the goals and objectives portion of the Plan.

In the final paragraph of “The Issues” section, we suggest replacing the phrase “need to become” (which appears twice) by using a more positive formulation such as “This will enable national planning processes to become more effective in mainstreaming biodiversity and highlighting its relevance for social and economic agendas, and Convention bodies to become more effective in reviewing implementation and providing support and guidance to Parties.”

P. 5 - We support a Vision for the new Plan that refers to the concept of people living in harmony with nature. The Canadian Biodiversity Strategy vision is similar - “A society that lives and develops as a part of nature, values the diversity of life, takes no more than can be replenished and leaves to future generations a nurturing and dynamic world, rich in its biodiversity.”

P. 6 – We do not have a preferred option among the three proposed versions of a Mission Statement for 2010. The first option is clearly the most comprehensive in attempting to address as many of the suggestions made in submissions as possible, but the resulting wording is awkward. It should be clear who will be taking action. Parties should be mentioned, as in the current 2010 Biodiversity Target, but we also suggest considering wording to encourage collaboration and partnerships, allowing others to make commitments as well.

We note that all three variations have at the end a reference to “ensure all countries have the means to achieve this”. We question whether this is realistic for a mission statement.

We concur with the need to take action that will by 2010 reduce threats to biodiversity, but the phrase “stop biodiversity loss” seems unrealistic. We certainly wish to avoid “change that is irreversible or has dangerous consequences for human well-being,” but caution that this could lead to an unproductive debate on what constitutes dangerous change. We would prefer language that refers to “reducing the risks to human well-being from biodiversity loss, and conserving options for future generations.”

We support a reference to “restoring ecosystems,” noting the important services they provide for human well-being. In the option “By 2020, to halt biodiversity loss, and restore it to ecologically sound levels,” we note that the need is to restore biodiversity itself, rather than biodiversity loss, to sustainable levels.

P. 7 – We agree that the targets should comprise both (a) aspirations for achievement at the global level, and (b) a flexible framework for national targets; and that “not all countries would necessarily need to develop a national target for each and every global target.” In general, the Strategic Plan should inspire and challenge jurisdictions in their specific context to develop action-oriented plans and targets.

P. 8 – We are pleased that communication has a high profile in the draft plan, as this is the focus for target 1. In the technical rationale for this target we suggest referring to key audiences for communication, education and public awareness: international agencies, national and local governments, businesses, NGOs and civil society.

P. 8-9 – Some refocusing of targets 2 and 3 would be helpful. At present, target 2 addresses aspects of both economic incentives (e.g., value of biodiversity, national accounts) and mainstreaming, while target 3 addresses only one aspect of economic incentives – removal of harmful subsidies. We suggest that target 2 address mainstreaming in general, and target 3 address economic issues, while acknowledging that these two concepts are closely linked. We support a reference to the “ecosystem approach” in the context of mainstreaming, but feel this concept is not well captured in the present wording of proposed target 2. It would help to move references to value of biodiversity and national accounts to target 3.

P. 10 - Target 5 addresses deforestation but then refers to “other natural habitats”. We suggest modifying it to focus exclusively on forests, just as target 6 exclusively focuses on marine ecosystems.

P. 10 – Target 6 – The proposed target is too specific and highly unrealistic. In general, we are adverse to specific targets due to several factors including the lack of scientific basis and the difficulty in measuring their effectiveness.

Importantly, Canada supports the existing initiatives already underway within the Food and Agriculture Organization of the United Nations (FAO) that provide guidance to assist countries in implementing the Code of Conduct for Responsible Fishing in an effort to secure responsible fisheries worldwide.

P. 10 - Comments on Technical Rationale for Target 6:

Many models suggest that reductions much greater than 10% of total catches are needed to eliminate overfishing. Moreover, the average of 10% takes advantage of the highly skewed distribution of catches among stocks. Many very large stocks, comprising a larger percent of the global fish catch, are not currently over-exploited. Hence their large biomasses buffer greatly the global average. For the large majority of stocks around the world where overfishing is a problem, reductions of much greater than 10% are needed before there is high likelihood that overfishing is eliminated and recovery has commenced. In addition, in overexploited fisheries, a reduction in catch of 10% requires a much greater than 10% reduction in effort. This is true even if only growth overfishing is occurring – and much more so if recruitment overfishing is occurring, (a 10% reduction in effort only means that the catch per unit effort (CPUE) for the remaining 90% of the effort increases). Catches are maintained and only employment is reduced. It does increase economic returns to the

remaining participants (marginally), but does no ecological good and likely does social harm. Such a reduction in fishing pressure could substantially diminish the likelihood of fishery collapses. If there is a serious likelihood of stock collapse, then fishing mortality (F) has to be much higher than 110% of a sustainable level of F.

Were a goal of 10% reduction in catch adopted, States would undoubtedly find this met most easily by reducing exploitation of the largest stocks, which are contributing the majority of the catch. For these stocks a 10% reduction in catch would not be identifiable in the long-term natural variation of the big stocks (+/- 25% of biomass of any stock within an decade would be considered a low rate of natural variation –for large stocks double-or half- within a decade from natural causes would be considered typical). Hence, meeting a target of 10% reduction in global or regional catches would not reduce pressure on stocks where biodiversity is a concern, but could significantly affect food security and employment.

P. 10 – Target 7 – We note that Aquaculture is mentioned in the target but not in the technical rationale. Importantly, the FAO is conducting a Technical Consultation in February 2010 on Technical Guidelines for Aquaculture Certification in an effort to have industry standards of sustainability adopted by the end of 2010. In addition, the reference to sustainability criteria is unclear (i.e. whose criteria?)

P. 10-11 - We suggest modifying target 8 to focus on agricultural biodiversity. The technical rationale for this target indicates that bringing nitrogen and phosphorus pollution below critical loads is mostly a matter of modifying agricultural practices (e.g., fertilizer use) and maintaining wetlands in agricultural landscapes.

P. 11 – Target 9 uses the term "prevent". We question whether this is realistic. We suggest that it will be impossible to "prevent" all introductions and establishment of invasive alien species. The technical rationale does not provide evidence that this could be done.

P. 11 - Target 10, by placing ocean acidification and climate change on an equal footing, highlights that rising carbon dioxide levels, independent of global warming, constitute a significant threat to life. The second part of this target – developing mitigation and adaptation “responses to climate change that are not detrimental to biodiversity”– contains a double negative. We suggest, in a spirit of enhanced cooperation between the CBD and UNFCCC, changing this phrase to “responses to climate change that build ecosystem resilience”. In turn, the technical rationale could include a sentence explaining that maintaining ecosystem resilience involves developing mitigation and adaptation options that are not harmful to biodiversity. The statement in the technical rationale that “marine systems need to be maintained below certain pH thresholds” is confusing - the challenge is to keep pH above thresholds for damage to calcifying organisms.

This isn't saying that climate change and acidification will be reduced – it is saying that we will manage aquatic ecosystems so that notwithstanding the pressures on those ecosystems from climate change and acidification, the impacts of those pressures will be lower due to greater ecosystem resilience to those pressures. The only way this can be achieved is to lower the impacts of more directly manageable pressures even more than they would be lowered to reach sustainability targets for the specific pressure(s) being managed. This will require unknown but probably very large reductions in human activities impacting ocean and coastal areas. We are being asked to buy a product without knowing its price, when the price is likely to be very high.

P. 12 – Target 11 proposes protecting “at least 15% of land and sea areas.” The current 2010 target includes a target that “at least 10% of each of the world's ecological regions effectively conserved”.

The proposed change to 15% for 2020 is not well thought through:

- A global target is relatively meaningless if the protected areas are not effectively distributed
- We are still along way from achieving the 10% ecoregional target on land, and even further away on water.
- A 15% global target is not based in science. The rationale suggests 15% is a good target just because it is achievable. So what? The change would be viewed by some as an arbitrary decision to move from 10% to 15%
- In the rationale, it is proposed that the 10% ecoregional target be maintained, but it is not clear how this would be done. Presumably what would be generally measured and reported on is the global 15% target.

We propose that the essence of the existing regional target be maintained, while adding a specific reference to freshwater environments, which are generally overlooked in protected areas accounting. Note that there is an existing CBD decision / target of “at least 10% of known inland water ecosystem area effectively conserved and under integrated river or lake basin management”.

Our suggestion would be:

“By 2020, at least 10% of each of the world's terrestrial, freshwater and marine ecological regions, including the most important habitats, have been protected through effectively managed protected areas, and integrated into the wider land and seascape”

We also propose that the technical rationale give attention to a common definition for “ecological region”. The 2010 Biodiversity Indicators Partnership has proposed using the WWF ecoregions framework, which includes terrestrial, marine and freshwater. Please note also that it is a priority for the UNEP-WCMC to assess freshwater PA coverage according to the WWF framework in the coming year.

Finally, we would note that in addition to use of the WWF ecoregions framework, Parties could encourage use of the 10% target at a full range of spatial scales and by various actors who manage lands and waters (e.g., cities and local authorities, individual farmers, etc.).

P. 12 – Target 12 refers to “preventing” extinction of vertebrates and higher plants. While the technical rationale notes that “in many cases” this can be done through in situ measures, we suggest noting that *ex-situ* conservation, and reintroduction to natural habitats, may be needed in some cases as a complement to *in-situ* measures.

P. 13 - As currently worded, target 15 will be difficult to measure. The technical rationale notes the need to identify, through participatory processes, those ecosystems that provide critical services. Including the word “identify” in this target would stimulate dialogue on both critical services and priority ecosystems, helping speed the identification and conservation of ecosystems that provide these critical services. Also, we suggest that the reference to climate change adaptation be omitted here, noting that targets 10 and 14 already deal with climate change. We propose: “...ecosystems that provide critical goods and services and contribute to local livelihoods have been identified and safeguarded or restored...”

P. 14 We note with interest the wording of proposed targets 17 (ABS) and 18 (8j). We offer the following suggestions for the targets and technical rationales, while noting that more fruitful comments on Targets 17 and 18 can be made when the ABS negotiations are more advanced:

Target 17. By 2020, **Access to genetic resources is enhanced, and substantial benefits are shared, consistent with the international regime on access and benefit sharing;**

Technical rationale: COP-10 is expected to adopt an international regime on access and benefit sharing. If a legally-binding regime is agreed, interim targets could be set for its ratification, entry into force, number of countries Party to it, etc. Should the international regime be non-binding in nature, indicators could be, the number of countries with national ABS frameworks/legislation, the number of technical assistance programmes for strengthening national ABS programmes and others.

Target 18. By 2020, **Traditional knowledge, innovations and practices are respected, preserved and maintained.** (SMART target to be developed at global and national levels).

Technical rationale: In line with article 8(j) of the Convention, traditional knowledge, innovations and practices of indigenous and local communities **should be respected, preserved and maintained**, and used in local ecosystem management, drawing upon experiences of customary use, with the approval and involvement of relevant communities.

P. 14 Target 19 deals with two broad issues – sharing technologies, and sharing knowledge of biodiversity (i.e., value and functioning, status and trends). For clarity we suggest addressing these two issues in separate clauses within this target. The phrase that begins "uncertainties are reduced..." seems rather weak and would be difficult to measure – we suggest deleting this. Given that the global community has reached consensus on the need for strengthening of the biodiversity science-policy interface, we suggest making reference to this in the target itself. In the technical rationale, we suggest adding a reference to "reducing risks to human well-being" associated with loss of biodiversity and ecosystem services.

P. 15 Proposed Target 20 refers to improving capacity to implement the Convention **tenfold**. We question whether this is realistic, and note that it would pose measurement difficulties, given that capacity has multiple aspects (official development assistance, innovative financing mechanisms, networking, training, etc.) as noted in the Annex.

P. 15 "... the Conference of the Parties would fully play the role assigned to it in Article 24 of the Convention." Change to Article 23.

p. 19 We note that Target 2 refers to "national accounts", so perhaps reference could be made in the Annex for this target to the United Nations Statistics Division, which leads the revision of the 2003 Handbook of National Accounting: Integrated Environmental and Economic Accounting (also known as SEEA 2003).