



Ahmed Djoghlaif, Executive Secretary
Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
413 Saint-Jacques Street, Suite 800
Montreal, Quebec, Canada H2Y 1N9
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Re: Notification: 2009-169 Revision and Updating of the Strategic Plan of the Convention

Dear Mr. Djoghlaif,

In response to your recent call for input on the strategic plan of the Convention on Biological Diversity (CBD), I am submitting the following set of comments on behalf of the Global Invasive Species Programme (GISP).

As you may know, GISP has a primary focus on international policy issues related to invasive alien species and has been very active in CBD discussions and implementation. GISP is also collaborating on a number of other indicator projects involving invasive alien species, including the GEF 2010 Biodiversity Indicators Partnership, and maintains an interest in seeing harmonization of outputs across the different efforts.

We appreciate this opportunity to provide input and feel free to contact us should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stas Burgiel', with a long, sweeping underline that extends to the right.

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Revision and Updating of the Strategic Plan of the Convention

The following comments are framed within the context of document UNEP/CBD/SP/PREP/2 Revision and Updating of the Strategic Plan (30 November 2009).

Strategic Goal B, Target 9: *By 2020, the introduction and establishment of invasive species has been prevented and emerging infectious diseases of wildlife controlled. (p.11)*

We are certainly supportive of a specific target on invasive alien species (note the terminology in the present language omits the word “alien”) and see it as best placed within Strategic Goal B on direct drivers of biodiversity loss.

The two most critical elements of this target are prevention of new introductions and control/management of invasive alien species already present. The current language addresses the first point, but only deals with control for a small subset of invasive alien species, namely infectious diseases of wildlife. We would prefer that the wording in that area be expanded to include extant invasive alien species as those are the ones directly responsible for adverse impacts on biodiversity. A slightly different formulation might read:

New introductions of invasive alien species are prevented and currently established invasive alien species, including emerging infectious diseases of wildlife, are identified, prioritized and correspondingly controlled or eradicated.

In terms of corresponding indicators, this language allows for a focus on pathways of introductions as well as management of priority invasive alien species (as control of all existing invasive alien species is highly unlikely by 2020).

For the supporting text in the ensuing paragraph in UNEP/CBD/SP/PREP/2, you may want to consider some of this additional information on invasive alien species.

Invasive Alien Species pose the 2nd biggest threat to biodiversity globally and in many ecosystems, notably Small Island Developing States, the greatest threat. They also constitute a major constraint to food security, human health and more broadly, economic development. The costs of damage caused by invasive alien species are estimated to be at least US\$ 1.4 trillion annually – close to 5% GDP (Pimentel *et al.*, 2001) and there is compelling evidence, based on global trade and movements patterns, that the magnitude of this threat is increasing globally (Hulme, 2009).

Recent work on the impacts of invasive alien species on the Red List Index, undertaken by GISP in collaboration with IUCN, Birdlife International and the Centre for Invasion Biology, shows that the extinction risk of birds, mammals and amphibians has increased, with IAS being the most important driver of extinctions in amphibians. IAS pressure is driving declines in species diversity and overall, their impact on species is increasing (McGeoch *et al.*, 2010). While there has been a significant increase over the last decade in the discussion of IAS at the international policy level, only half of the countries that are signatories to the CBD have national legislation relevant to invasive alien species (McGeoch *et al.*, 2010).

Annex, Strategic Goal B, Target 9: In light of our comments above on the specific wording of Target 9, we have some suggestions for the content of the table in the Annex keeping in mind the need for SMART indicators and targets.

Means and Examples of Activities: The current list includes examples related to quarantine, control and research. We would also suggest a broader focus on pathways, which could read “guidance for the management of priority pathways, such as the trade in pets, aquarium and terrarium species, and live food and bait.”

Possible Indicators: It would be useful to measure progress against tasks and obligations already included in past CBD COP Decisions. This could help direct corresponding action by Parties working to fulfil this target as well as broader international efforts to address major gaps in the international legal framework related to invasive alien species. We would thereby suggest the following indicators:

1. Guidance developed to address the gaps and inconsistencies in the international legal framework identified in CBD COP Decision VIII/27.
2. Progress in national implementation, including number of countries with:
 - a. national invasive species strategies and action plans;
 - b. ratification of international agreements and standards related to the prevention and control of invasive alien species (e.g., International Maritime Organization – Convention for the Control and Management of Ships’ Ballast Water and Sediments; International Plant Protection Convention – International Sanitary and Phytosanitary Measures; Ramsar Convention on Wetlands of International Importance; World Animal Health Organization – international standards for animal health and animal products; World Trade Organization – Agreement on the Application of Sanitary and Phytosanitary Measures);
 - c. implementing legislation for a and b.
3. Progress towards the achievement of Target 10 of the Global Strategy for Plant Conservation.

Possible Synergies and Partnerships: In addition to the present focus on international institutions, we would suggest inclusion of the World Trade Organization’s Committee on the Agreement for the Application of Sanitary and Phytosanitary Measures, and more specifically its work with the Standards and Trade Development Facility (STDF – a partnership of the WTO, World Bank and FAO). The STDF plays a key role in capacity building around the implementation of international standards and there are likely synergies that could be developed in ensuring coverage of relevant ecological aspects of invasive alien species.

I would also note that other targets include reference to a range of civil society organizations, and might thereby suggest reference to the Global Invasive Species Programme as well as IUCN’s Invasive Species Specialist Group (ISSG). GISP and ISSG have been frequent collaborators with the CBD Secretariat and the broader Convention process.