

## **Revision and Updating of the CBD Strategic Plan (UNEP/CBD/SP/PREP/2)**

### **New Zealand Comments and Suggested Changes**

New Zealand offers the following comments on the Strategic Plan document UNEP/CBD/SP/PREP/2 to inform the Secretariat's review which will result in a revised Strategic Plan being released in February 2010.

#### **General comments**

While New Zealand supports in principle the adoption of new biological diversity targets, we have some questions and concerns about the concept and practicality of Convention of Biological Diversity (CBD) setting targets, especially those measured at the global level that do not reflect the reality of the inter-connected but differing nature of ecosystems in different regions. This is canvassed in detail below.

Care needs to be taken that the Strategic Plan does not set targets in areas that are beyond the mandate of the CBD. This need not preclude pulling in existing indicators from other multilateral environmental agreements (MEAs) provided they relate back to a target that is within the CBD mandate to control.

It is strongly recommended that the new strategic objectives and target framework be kept simple. The intervention logic around how the indicators create a cohesive package to deliver on the targets is absent. This is required in order to provide people with the reassurance that the indicators are describing the right things. The indicators (and measures below them) need to be developed hand-in-hand with the targets.

The headline indicators also appear to have a number of shortcomings – the indicator set is incomplete and under-developed in a number of areas (e.g. ABS and indigenous knowledge, genetic resources, ecosystem services, science and technical transfer, threats). The adequacy of the data underlying the indicators appears variable; there is no clear process or criteria for evaluating the scientific rigour of the indicators; methods and measures for assessing the significance of change and distance to target are under-developed. (Note – resolution of this is the objective of Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) which might greatly improve this setting).

New Zealand is of the view that all post-2010 indicators must be scientifically rigorous and peer reviewed. They must have clear time-defined baselines and criteria for success, that is, ways in which Parties will know what they are delivering. They must be based around robust data, for without data there will be no way to measure change or trend. Unless the indicators provide this there will be little way in which we can assess progress towards targets, link cause to effect and take informed action.

A high priority should be given to national scale expansion of the coverage of existing indicators and measures, recognising the dependency on resources (capacity building).

Countries already using indicators and measures with success stories to tell could also provide these (together with their methodologies) to the CBD, in order that the Secretariat can make them available for Parties to review and potentially adopt.

The concept of "SMART" targets is key but seems more appropriate at national level. As the plan itself notes, the actions are most relevant at the national level. Some current targets do not appear SMART E.g. Target 2, which reads more like an aspirational goal – not strategic,

measurable, ambitious, realistic and time-bound. Indeed it 'collects' a range of disconnected concepts (benefit-sharing, poverty reduction, ecosystem approach, conservation)

We support the promotion of cooperation and the effective use of the Joint Liaison group and Collaborative Partnership on Forests to enable synergies between the multilateral environmental agreements (MEAs).

We support the key strategic view around valuing biodiversity including the associated ecosystem services, especially in the context of sustainable use and its balance with conservation and how this is reflected in National Biodiversity Strategies and Action Plans (NBSAPs). Understanding and accounting for these values as an integral part of economic planning, markets, trading and policy is a major step to be taken in most countries. This must be considered alongside ongoing work on intrinsic and non-market valuation of biodiversity.

## **Vision**

New Zealand is of the view that a revised Strategic Plan should set a new horizon of 2050. We believe this is sensible, given the long timeframes within which biological systems are expected to respond. Response and recovery rates to interventions are generational at least and achievement targets should be set with this in mind.

The proposed vision statement is endorsed inasmuch as it captures the essence of the Convention objectives, but we would dispense with the headline statement ("Living in harmony with nature ...") which appears a little trite and clichéd. The full statement could now read:

*Biodiversity is maintained and restored, sustaining a healthy planet and delivering benefits essential for all people.*

While this captures the intent of the vision, as a vision statement fails to be overly inspirational or motivational. It does not embody the CBDs unique distinctive objectives and character, that is, the collective spirit of 192 nations working collaboratively to conserve biological diversity. Something like the following might be an alternative starting point:

*Securing the Planet's Variety of Life.*

## **Overall Mission Statement**

New Zealand contends that the setting of interim achievement milestones for targets out to 2050 is appropriate and necessary. Indicators and measures should also be coupled so there is a transparent logic in what is being measured, against which target and over what timeframe. We suggest milestones could be set decadally to 2050.

## **Targets**

### **Target 1**

Noting New Zealand's concerns about targets in general, we consider that the wording should more reflect the need for biodiversity values to be understood, quantified and embodied in policy and economic strategies; as well as being communicated more generally through public education mechanisms and campaigns. Rather than a target, this is a goal or principle. The suggested means of measurement in the technical rationale seems arbitrary and we have questions about their usefulness. If some measure of progress is sought, the focus should be on outcomes.

Using the term 'value' seems subjective and we suggest 'importance' or 'significance' instead.

We wonder how effective the particular survey referenced has been in terms of establishing levels of European awareness of biodiversity. Is it regarded as an authoritative vehicle, are its margins of error clearly enunciated, has it generated a reaction or discussion (i.e. informal recognition)? If answers to these questions are affirmative, then how transferable might the eurobarometer survey be to other countries i.e. is it robust enough to be used globally in order to establish a global measure of awareness?

New Zealand does regard the suggestion in the technical rationale that there is broad education about the value provided by preservation of biodiversity as worth retaining.

#### **Target 2**

New Zealand regards the integration of biodiversity into national policies as of key importance to a strategic view on biodiversity. However we also think that the progress of this should be not so much by “value” but through outcomes that show the extent of integration and that are measureable by tools such as cost benefit analyses.

#### **Target 3**

New Zealand broadly supports this target but queries how the distinction is made between those subsidies that are harmful and those that are not. A more appropriate principle may be to focus on wider issues regarding “any actions that are harmful to environmental values” (e.g. illegal logging).

#### **Target 4**

New Zealand is concerned that the targets proposed by any new Strategic Plan not exceed the mandate of the CBD. This target appears overly broad.

#### **Target 5**

New Zealand supports the principle of working to achieve progress as explained in the technical rationale although no clear reasons are given for selecting a target of halving the rate of these losses.

We know of no regionally or globally agreed baselines from which to assess this level of change. The reference to gross deforestation appears too optimistic as the measures and methodology have yet to be refined (e.g. via remote sensing which currently is not looking promising). Forest cover, for example, may be an acceptable proxy for timber stocks, but says less about the condition of forest biodiversity. This is particularly so when forest degradation is regarded as critical an issue as deforestation.

#### **Target 6**

New Zealand has real concerns about the expression of this target, while acknowledging that, globally, much is needed to address the biodiversity impacts of fishing.

Catch reduction is just one of several ways to reduce adverse environmental effects of fishing. New Zealand would oppose an arbitrary target of 10% reduction in catch, and blanket prohibitions on particular fishing practises. These would be costly and potentially ineffective ways to achieve progress in biodiversity protection in relation to fishing.

This target seems predicated on the assumption that all fisheries lack effective constraints on fishing effort and/or catch levels. This is not the case in New Zealand, for example, which has been internationally acknowledged as having strong processes in place for sustainable fisheries management.

The impact of different fishing practices on marine biodiversity and ecosystem function needs to be assessed within the context of resilience and a more improved understanding of essential habitats that need to be maintained to prevent 'reaching ecosystem tipping points'.

We suggest that target 6 be reworded along the lines of:

*By 2020, steps have been taken to remove excess fishing capacity and appropriate steps taken to address adverse effects on biodiversity caused by fishing practises*

This target deals with managing fishing and the effects of fishing. However, stresses to marine biodiversity and the marine ecosystem go beyond fishing, e.g. land practices and their impact on coastal systems, pollution, mining or extraction practices and broader issues such as climate change (acidification and so on). The balance of these pressures on marine systems will differ around the world, and the resilience of any given system will differ substantially.

These wider issues are only partly addressed in targets 8, 10 & 11.

Responsibilities for marine resource management are often fragmented and governments should be encouraged to seek ways of integrating the assessment of cumulative stress on marine ecosystems and how that can be reduced to maintain not only biodiversity but healthy ecosystem functioning. It would be useful to incorporate additional content in the strategic plan which addresses the issue of the combined anthropogenic pressures on marine ecosystems – these need to be assessed and integrated actions to reduce them to a sustainable level.

#### **Target 7**

The target here concerns the core tenet of sustainable use and the context of the ecosystem approach. New Zealand suggests that a principle should reflect the integration of sustainable management principles into natural resources management, and this progress which should be measurable at the national level.

As noted in the technical rationale there are no universally agreed sustainability criteria which renders the current wording of the target problematic. The target should therefore be suitably qualified to reflect this.

#### **Target 8**

New Zealand considers this target perhaps stays beyond the mandate of the CBD.

This is an important issue for biodiversity in freshwater and close inshore aquatic ecosystems although the target strays into the territory of other MEAs. It would be useful to suggest a course of action that was aligned to / made appropriate links to those other MEAs.

#### **Target 9**

New Zealand considers it important to adopt a more holistic approach to invasive species and emerging infectious diseases and consider them together as risk organisms and to manage them using a risk management approach.

We proposed that instead, a "SMART" outcome should be to focus on the management and regulation of pathways for organisms that present the highest risk to biodiversity and to develop adequate systems to respond to incursions and outbreaks in a timely and effective manner.

## **Target 10**

New Zealand has concerns as to whether this target is achievable and whether the science is mature enough to identify effective mitigation strategies.

This target is too aspirational to achieve in the suggested timeframe, but direction to improve the science and introduce appropriate and effective measures should be considered. We need to know how and if things are changing.

## **Target 11**

New Zealand has serious concerns over the arbitrary 15% target proposed which may not necessarily lead to an outcome that furthers biological diversity.

We are broadly supportive of the use of a representative network of marine protected areas, using a range of tools, and located to minimise costs to existing users as a means to address adverse effects on biodiversity. We support a target of establishing such a representative network – and this is a way to step around the difficult issue of specifying a % area (which on its own will not necessarily deliver the required biodiversity protection).

We note that the use of protected areas to safeguard populations, as outlined in the technical rationale can also be, conversely, a blunt, costly and inefficient way of attempting to sustainably manage species. This is felt to be especially so in the fisheries area.

## **Target 12**

New Zealand has concerns regarding the assumptions underpinning this target as they relate (or do not relate) to invertebrates, lower plants and microbiological organisms. The technical rationale appears difficult to verify. New Zealand agrees that the most important areas for biodiversity (e.g. 'hot-spots') should be effectively conserved first and that targets need to embrace all biomes and all taxonomic groups, not just vertebrates and plants.

However, depending on definition of the term "protected" - this may create an issue with management of some protected species in New Zealand – in the marine environment for example there are measures in place to manage incidental mortality of protected species, and limits set to rebuild the population over time - but there is not necessarily (complete) protection at a site, nor is this necessary to meet biodiversity goals.

## **Target 16**

NBSAP's are on a 5 yearly review cycle and any suggested review should be aligned with that cycle. In some cases the NBSAP may have only just been completed or just reviewed and the return on the resource involved in reviewing after less than 5 years would likely be marginal. Also on a practical level, there are significant implications for stakeholder input/support and perceptions if NBSAP's are reviewed in less than 5 yearly intervals.

New Zealand is also of the view that it would be wise to make provision for the regular review of progress against the original NBSAP. Given that action and results are a very lengthy process, there should be checkpoints along the way (we suggest decadal) where progress is identified and failures corrected. The current process of National Reporting is not consistent across nations and regions which is why we support the development of set of scientifically defensible and globally standardised measures of biodiversity status and trends which can be implemented consistently by all nations.

## Target 17

While supporting the intent of Target 17 New Zealand considers that, again, this target seeks to expand the mandate of the CBD beyond the language of the Convention. Accordingly we would suggest that “with benefits shared” be substituted for “and substantial benefits are shared” in the Target. There is no guarantee that enhanced access to genetic resources arising out of any new international regime will lead to the generation of “substantial benefits”.

## Target 18

New Zealand views this target as going beyond the mandate of the CBD, in particular Article 8(j). Article 8(j) contains no reference to the rights of indigenous and local communities (ILCs). It also refers to knowledge, innovations and practices of ILCs “*embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity...*”. Accordingly we think that Target 18 should be qualified to more accurately reflect the language of the Convention.

## Target 19

New Zealand reiterates its previous comment around the use of the idea of ‘value’ as for Target 1.

New Zealand does not agree that much of the knowledge related to biodiversity already exists and, in fact, views this as a critical area where further work is crucial. Accordingly we would suggest the technical rationale be recast as follows:

*Technical rationale:* Each country needs access to information to identify threats to biodiversity and determine priorities for conservation and sustainable use. Relevant information includes biodiversity-related data as well as tools and methodologies for biodiversity conservation, sustainable use and benefit sharing, and case studies of their use. What is critically urgent is a review of, and global agreement on, a confirmed set of scientifically defensible and globally standardised measures of biodiversity status and trends. This would support consistent implementation by all nations.

Furthermore, this should be accompanied by the establishment of national and regional frameworks within which ongoing monitoring of essential measures of species, ecosystems and ecosystem service condition occur. Secure and openly shared national, regional and global data, so accrued, should feed into an international clearing house mechanism where assessments of global biodiversity status and trend are analysed and coordinated. Further efforts are also needed, at multiple scales, to improve biodiversity-related knowledge and reduce uncertainties around the relationship between biodiversity change, ecosystem services and impacts on human well-being. This requires substantial investment in global and national biodiversity measurement and verification systems, observation networks, implementation of the global taxonomy initiative, and further investment in research, including modelling. Improvements are also needed in the science-policy interface.

Consideration is needed of the various mechanisms of science and technology transfer, so a seamless process is developed to ensure the products of scientific assessments are delivered to the policy process in a timely and useable form. Indicators of progress could include: a globally agreed set of status and trend metrics; number of countries with national clearing house mechanisms; visitors/per year at each national CHM websites; extent of data coverage for global biodiversity indicators and measures; frequency of global assessments and improved consistency and use of biodiversity-related information in the fifth and sixth national reports.

New Zealand proposes a new target focused specifically on improved science knowledge generation as the platform upon which the CBD can make informed assessments of status and trend in biodiversity and ensure uptake and use of scientific information in national, regional and global decision-making.

A new target might accordingly be framed as:

*“A key set of essential scientifically derived metrics for the standardised monitoring of biodiversity status and trend is available for use by all nations by 2020 and the results shared and made accessible for regular global assessments.”*

Wellington  
13 January 2010