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Montreal
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**Revision and Updating of the strategic plan
Doc. CBD/SP/PREP/2
Comments of Pro Natura- Friends of the Earth Switzerland - and of the German NGO
Forum Environment and Development**

Dear Secretariat,

Thank you for the opportunity to comment on the preparatory document CBD/SP/PREP/2. The following submission is a joint submission on behalf of Pro Natura – Friends of the Earth Switzerland – as well as of the German NGO Forum Environment and Development.

Let me begin by congratulating you on the excellent draft for the strategic plan. It is well-structured and we support the sequence in issues, mission, targets and monitoring. We are happy to see that you followed our suggestion to come up with more concrete and measurable targets. We fully support the SMART concept for determining these, and we also support the specific targets as such. Last not least, we do support the anticipated reduction of the text to a 5-10 page document.

Having expressed our general support and agreement on the document in terms of structure, content and procedure, we can restrict ourselves to giving our views on the ideas proposed for a post-2010 vision and mission, CBD targets as such, on suggesting details on the targets, adding a few additional ones and suggesting priorities. These suggestions are the ultimate result of the German NGO Forum' s workshop on the post-2010 target which was held in Berlin, Germany, on November 26, 2009, with input – among others -from IUCN (Countdown 2010), DIVERSITAS, the European Commission (DG Environment), the European Habitats Forum and the German Ministry of the Environment. In addition to the suggestions assembled during the workshop, comments have been made by Anita Idel, Deutsche Umwelthilfe (DUH) and BUND – Friends of the Earth Germany.

Our comments follow the structure of the draft proposal.

Vision

We are sceptical concerning the necessity of having a 2050 vision. We see the danger of having a fallback line in case we do – once again – not meet the 2020 targets. Given the urgency of acting, we would rather support having clear and ambitious 2020 mission and targets than having an utopy that looks nice now but may never be reached,

However, if you do insist in having a vision, we have the following suggestion:

“Man lives in harmony with nature - species and habitats are conserved at, and restored to, 1980 levels, and used in a way that supports this goal, sustaining a healthy planet and delivering benefits essential for all people”.

Mission

Of the three proposed versions of an overall post-2010 targets, the second one is definitely the preferred option. It is not sufficient to have undertaken actions – some states could argue they have done so far – but these actions have to be measured by the fruit they bring. Option 2 does this. It builds on the existing 2010 biodiversity target, taking into account other parts of the Convention (ABS) and MDGs. The term “ecologically sound level”. needs more clarification; also we think the ecosystem language should be adapted, so we suggest the following version of option 2:

“By 2020, to halt biodiversity loss, restore species and habitats to favourable conservation status, and ensure resilient and functioning ecosystems that provide a multitude of ecosystem services, while equitably sharing the benefits contributing to human wellbeing and poverty reduction. To ensure that all countries have the means to achieve this.”

Targets

Among the targets proposed, the targets number 1,2,3,5,6,7,8,9,10,11,12,15,16,17,20 were identified to be of special importance to the members of the Forum.

Target 12 is regarded as being of the ultimate goal and being of paramount importance, while the other targets should contribute to it.

Indeed one wonders why strategic Goal C – direct action – does not get mentioned first.

Proposed targets

Target 1. By 2020, Everyone is aware of the value of biodiversity and what steps they can take to protect it.

Target 2. By 2020, The value of biodiversity, and the opportunities derived from its conservation and sustainable use, and the fair and equitable sharing of benefits arising from the use of its genetic resources, are recognized and reflected by **world trade policy and** all countries in their national development and poverty reduction policies and strategies, national accounts, economic sectors and spatial planning processes at all levels of government, and by the private sector, applying the ecosystem approach.

Target 3. By 2020, Subsidies harmful to biodiversity are eliminated.

Target 4. By 2020, Governments and stakeholders at all levels have formulated and begun to implement sustainability plans to increase efficiency, reduce waste and maintain the use of resources within ecological limits;

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Target 5. By 2020, Gross deforestation and degradation of natural forests, and the loss and degradation of other natural habitats such as Savannas, wetlands, peatlands, rivers, marine, arctic and alpine habitats is halted. Of the managed forests, at least 50% are composed of native species typical for the site. At least 10% of the forests of each ecological region are not used economically.

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Target 6. By 2020, Pressure on marine ecosystems through overfishing halted, and destructive fishing practices are eliminated.

Target 7. By 2020, All areas under agriculture, aquaculture and forestry are managed according to sustainability criteria so that they keep their biodiversity, productivity and vitality as well their capability to fulfil important ecological, economic and social functions at all levels. The loss of traditional land use forms rich in biodiversity, such as extensive fields, meadows and pastures, is halted.

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Target 8. By 2020, Pollution from excess nutrients (nitrogen and phosphorus) has been brought below critical ecosystem loads.

Target 9. By 2020, The introduction and establishment of invasive species has been prevented and emerging infectious diseases of wildlife controlled. (SMART target to be developed at global and national levels).

Target 10. By 2020, The impacts of climate change and of ocean acidification on ecosystems have been halved and responses to climate change that are not detrimental to biodiversity have been agreed. (SMART target to be developed at global and national levels).

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Target 11. By 2020, At least 15% of land and sea areas, including the most critical terrestrial, freshwater and marine habitats, have been protected in every ecoregion through effectively managed protected areas and/or other means, and integrated into the wider land- and seascape as well as connected to each other through ecological corridors. Gaps identified have been filled, and the protected areas are sufficiently and sustainably managed and financed.

Target 12. The extinction of known threatened species (vertebrates and higher plants) has been prevented. The status of all known threatened species on the IUCN Red Lists has been improved by at least one degree.

Explanation: As pointed out in the draft GBO3, it is especially the threatened Species (vulnerable, endangered and critically endangered) that need to be prevented from extinction, and their status has to be improved to get their population within safe limits. The addition to the target is taken from the German NBSAP from 2007.

Target 13. By 2020, The status of crop and livestock genetic diversity in agricultural ecosystems and of wild relatives has been improved. Loss of races and breeds has been halted. (SMART target to be developed at global and national levels).

Target 14. By 2020, The contribution of biodiversity and terrestrial, freshwater and coastal ecosystems including soils to sequestering and retaining greenhouse gases has been enhanced.

Target 15. By 2020, Terrestrial, freshwater and marine ecosystems that provide critical services, and ecological resilience or that contribute to local livelihoods and climate change adaptation have been safeguarded or restored, and adequate and equitable access to essential ecosystem services is guaranteed for all, especially indigenous and local communities and the poor and vulnerable.

Target 16. By 2020, Each Party has an appropriate, up-to-date, effective and operational national biodiversity strategy, consistent with this Strategic Plan, based on adequate assessment of biodiversity, its value and threats, with responsibilities allocated among sectors, levels of government, and other stakeholders, and coordination mechanisms are in place to ensure implementation of the actions needed; and this NBSAP has been integrated into all national policies and implemented.

It is not sufficient to have an NBSAP and allocated responsibilities, it must also be implemented. Considering 87% of parties meanwhile have an NBSAP and 11 more are in the process of designing one, it seems achievable to have these implemented in 10 years, and of course it is necessary.

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;

Target 18. By 2020, Traditional knowledge, innovations and practices and the rights of indigenous and local communities over these are protected (SMART target to be developed at global and national levels).

Target 19. By 2020, Knowledge and technologies relating to biodiversity, its value and functioning, its status and trends, and the consequences of its loss, are improved and widely shared, and uncertainties concerning biodiversity change, ecosystem services and impacts on human well-being are reduced;

Target 20. By 2020, Capacity (human resources and financing) for implementing the Convention has been increased tenfold. Job assignment and allocation of funds should be transparent and democratic. (This target should be synchronized with the Strategy for Resource Mobilization)

Suggestions for additional targets

Target 21: By 2020, All international programmes, policies and instruments so far decided are implemented, and a multilateral governance architecture has been implemented.

Explanation: Many instruments and decisions have already been decided – such as the Berne Convention with its Emerald Network, Natura 2000, the pan-european ecological network, national parks, the Global strategy on plant conservation (GSPC) and other CBD programmes. Their slow or lacking implementation is one of the major reasons for missing the 2010 target; on the other hand, there is much to be won if these decisions and laws were implemented before one thinks of new mechanisms. Closely related is the question of governance.

Target 22: By 2010, an independent international expert panel on biodiversity and ecosystem services (IPBES) has been established.

Target 23: By 2020, at least 5% of every ecoregion have been set aside as wilderness areas that are not used economically.

Monitoring, review and evaluation

Independent and regular monitoring of the targets allows for adequate and quick reactions and is essential for an effective, well-targeted policy. In this respect, we very much welcome the table presented in the annex. We think the six columns are well-chosen and helpful; of special importance for monitoring is column 3 (indicators). The indicators should be reviewed at regular intervals (before every WGR session) to show progress, and the results posted on the CBD web page.

As you state, the table is there only for illustration so we expect there will be another opportunity for specific comments on this. However, we already want to point out already now that for target 10, the area of peatlands and of pristine forests (in km²) should be added as indicators.

Best regards,

Friedrich Wulf