

Friedrich Wulf
Leader International Biodiversity Policy
Pro Natura
Friends of the Earth Switzerland
Dornacherstr. 192
CH-4053 Basel
Switzerland



Secretariat of the Convention on Biological Diversity (CBD)
413 Saint-Jacques Street, Suite 800
Montreal, QC H2Y 1N9
Canada
- By e-mail: secretariat@cbd.int

31/08/2009

Revision and Updating of the strategic plan Submission of Pro Natura – Friends of the Earth Switzerland

Dear Secretariat,

Thank you very much for the opportunity to comment on the strategic plan.

Document CBD/SP/PREP/1 of June 5, 2009 contains many valuable suggestions for the further development of the strategic plan. We have found little so far I do not wholeheartedly support or at least not disagree with. Of course, the main question is how to condensate these into a concentrated and effective document, as paragraphs 41 (p.10) and 73 (p.20) conclude.

The general discussion that is actually taking place within IUCN, in the EU, at the G8 plus 5 meetings in Siracusa and L'Aquila and other relevant meetings and organisations is well reflected in the document. In the face of the obvious failure to reach the 2010 target, opinions seem to be converging into a set of consensual points for a new target and future action to save biodiversity:

- Biodiversity policy needs to be mainstreamed into all sectors. These need to recognize their role in biodiversity loss and actively develop strategies and measures to reduce their negative impacts and support biodiversity.
- People, Policy makers and Economy must be made aware of the services the ecosystem provides. Economic rules must take heed of the value of these services, the price of goods and services should reflect the costs for these. In order to do this, the ecosystem services must be assigned a value. We very much look forward for the TEEB study for concrete suggestions on this. We strongly support paragraph 31 on p.7.
- The Underlying Causes/Drivers for biodiversity loss should be more strongly addressed and challenged (para 33).
- On the whole, it is important that economic mechanisms align with ecological interests. It must make economic sense for business to act ecologically and sustainably. This requires national laws and frameworks, but it also requires globally accepted rules which should be generally accepted – e.g. by the WTO. One important part of this is a global agreement on Access and Benefit sharing (ABS).

IUCN is currently discussing on how to develop the post- 2010 target It will very likely suggest to maintain the actual 2010 target but to broaden this including cross-sectoral integration and to look more closely at ecosystem services and at the key drivers.

Attached please find Pro Natura's comments to their position.

We would suggest 2020 as new timeline for a complete stop of the loss and 2015 for halving it as a milestone. Having 2050 as a long-term timeline is risky, action may and will be unnecessarily and dangerously postponed.

A post-2010 goal based on this could look something like this:

"Parties agree (i) to halt the loss of species, varieties and habitats until 2020, (*meaning there will be no further extinction of species and varieties, no more loss of natural habitats and endangerment of species and habitats will not exceed the present levels*), (ii) to ensure that it does not pay to destroy biodiversity and (iii) there is no more incentive for the unsustainable exploitation of Nature." Of course, this would have to be refined, milestones for 2015 would have to be defined and supported by a system of sub-targets (e.g. economic ones, as suggested in para 48 (p.13).

That being said and affirmed, we would like to emphasize the need to extend the existing SP Plan – which is process- and strategy oriented – and add **outcome-based**, MRV goals like stopping net deforestation by 2020 (Para 43, p. 11). **Pro Natura wholeheartedly agrees with paragraph 79 (p.21)**. COP 10 should indeed decide on a set of such goals which are to be developed from the different POWs, but also the needs of the Millennium Assessment, GBO 3 and other scientific analysis. Time does not allow me to come up with concrete suggestions now but we will be happy to contribute to the discussion during the coming weeks, if appropriate.

Amongst the different instruments of the CBD, the GSPC is a model for an outcome-based strategic plan, as pointed out in Paragraph 40. It is indeed quantified, measurable and has had a clear time line. However, the Plant Conservation Report presented in CBD/COP/9/INF/25 does not make use of this and does not systematically report on the state of implementation but just is a nice brochure illustrating initiatives. In the procees leading to Decision XI/3 in Bonn, text and language to enhance the need for a measurable and quantifiable assessment of progress towards GSPC implementation that originally was incorporated in the draft were omitted. We would have liked an overview table on how progress in all parties is up to date in implementing the GSPC to identify main gaps and needs for further action.

A clear picture of progress is paramount for focussing necessary actions. In my view, therefore, it is vital to have an outcome-oriented strategic plan – like the GSPC or even more precise - with measurable, quantifiable goals as the main necessity –apart from adequate financing (para 59) which can, in part at least, be achieved by deviating money yet wasted on perverse incentives.

Best Regards,



Friedrich Wulf

Attachments (1)