



**Comments on the Revision and Updating of the CBD Strategic Plan:
Possible Outline and Elements of the New Strategic Plan
(UNEP/CBD/SP/PREP/2, 30 November 2009)**

South African National Biodiversity Institute

18 December 2009

SANBI welcomes the opportunity to comment on the draft outline and elements of the revised CBD Strategic Plan, and we look forward to engaging further with the process as subsequent drafts are developed.

SANBI supports the intention that the Strategic Plan should provide a flexible framework for national planning and implementation, and that it should be brief and succinct. We also support:

- The framing of biodiversity as underpinning ecosystem services,
- Linking biodiversity conservation to cost effective climate change resilience and adaptation,
- The shift towards using the term "pressures on biodiversity" rather than "threats to biodiversity" (although the term threats creeps in later in the document, for example in the first and third proposed mission statements on pages 6 and 7),
- The emphasis on mainstreaming as one of the key actions required,
- The emphasis on spatial planning and land use planning as a key area with which the biodiversity sector should engage.

We prefer the second suggested Mission statement, which is shorter and more digestible than the first and third suggestions.

We would like to draw the Secretariat's attention to a recently published article in *Science*¹, which proposes a revised indicator framework for the CBD comprising a smaller set of headline indicators in four focal areas:

- Pressures—threats
- Status—trends
- Benefits—services
- Actions—responses

These four focal areas correspond exactly with the focal areas in South Africa's national biodiversity monitoring framework, and also align with the pressure-state-response approach often used for state of environment reporting.

SANBI would strongly support such a revision of the headline indicator framework as part of the revision of the Strategic Plan, recognising that it may have implications for the structure of the Strategic Goals and Targets.

More detailed comments on some of the Strategic Goals and Targets follow.

Target 2:

The presence of SEA, EIA or similar assessment tools should not be regarded as an indicator that biodiversity has been mainstreamed or even taken into account. South Africa's experience is that many SEAs and EIAs fail to take meaningful account of biodiversity; as a result mainstreaming biodiversity in SEA and EIA is an important area of work for SANBI. The indicator would need to reflect not just the presence of SEA and EIA but also that biodiversity is meaningfully integrated in SEA and EIA processes and outcomes. We recognise that this is difficult to measure.

¹ Walpole, M et al. 2009. Tracking Progress Toward the 2010 Biodiversity Target and Beyond. *Science* 325 (18 September 2009): 1503-1504.

Target 3:

It would be useful to broaden this target to deal with perverse incentives including subsidies, rather than just with subsidies. Perverse incentives could include, for example, property rates policies that encourage change in land use from natural habitat to intensive agriculture or other forms of production destructive to biodiversity.

Strategic Goal B:

This strategic goal would benefit from more explicit emphasis on freshwater biodiversity and freshwater ecosystems, including a target that deals with over-abstraction of freshwater. Over-abstraction of freshwater, or flow modification more broadly, is a major driver of loss of freshwater ecosystems and biodiversity, and should receive attention in the Strategic Plan. In relation to the terrestrial environment, it may be worth explicitly mentioning intensive agriculture and urban sprawl as causes of loss of natural habitat.

Target 5:

This target should focus on “natural habitat including forests” rather than singling out forest ecosystems. In South Africa, indigenous forests make up less than 1% of the country’s land area, so a focus on forest ecosystems sends the message that other ecosystems (such as grasslands, savannah, fynbos etc) are less important. This is not helpful for mainstreaming biodiversity in other sectors.

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