

Updated WCS recommendations on Draft 1 of the Post-2020 Global Biodiversity Framework



Introduction to WCS

The Wildlife Conservation Society ([WCS](http://www.wcs.org)) is an international non-governmental organization (NGO) that has been working across the globe for more than 125 years to save wildlife and wild places. We have conservation programs on the ground in more than 60 countries across Asia, Africa, the Pacific, and the Americas that work in partnership with governments, Indigenous Peoples and local communities, the private sector, and stakeholders on science-based conservation efforts.

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Key Substantive Changes to our first Position Statement on Draft 1

WCS published our initial recommendations on Draft 1 of the Global Biodiversity Framework (GBF) in August 2021 [[link](#)]. This updated version (published January 2021) has been simplified to focus on areas of divergence between Parties during the Open-Ended Working Group on the post-2020 GBF ('OEWG'). To assist Parties, we have made efforts to streamline our recommendations for goals and targets.

Substantive updates include:

- Our recommendations for Goal A and Targets 1-3 now use standardized language to prioritize areas for conservation (e.g., "highly intact ecosystems and other areas of particular importance for biodiversity"), drawing on the proposals of Parties during the virtual session of the OEWG. This is intended to reduce confusion and ensure that these goals and targets are relevant for all Parties.
- We have refined our guidance on headline indicators for ecosystem integrity, area-based conservation measures, and wildlife exploitation and trade following interventions from Parties and consultations after the OEWG virtual sessions in August.
- We have amended our proposal for Target 3 to address the need to respect the customary use and rights of Indigenous Peoples and local communities, including the right to Free, Prior, and Informed Consent (FPIC) as a precondition to the establishment of area-based conservation measures. This should be supported by robust targets on the engagement of Indigenous Peoples and local communities (see below).
- We have updated our proposals on resource mobilization to reflect ambitious new financial figures in line with proposals made during the OEWG virtual sessions.

Updated WCS Recommendations on Draft 1 of the GBF

Overall impressions and general concerns

Generally, WCS supports the proposed structure of the GBF in Draft 1, with outcome-oriented goals for the state of biodiversity and action-oriented targets that measure interventions for the

conservation, sustainable use, and sharing of benefits from genetic resources. WCS strongly supports outcome-oriented goals for 2030, whether in Milestones or elsewhere in the framework.

Furthermore, we welcome the enhanced role for Indigenous Peoples and local communities (IPLCs), as well as holders of traditional knowledge, as critical leaders and partners in biodiversity conservation. This can be strengthened across the framework, with overarching statements of principle and precise modalities in key targets, such as the right to Free, Prior, and Informed Consent (FPIC) in the context of area-based conservation.

However, the level of ambition remains insufficient relative to previous political commitments such as the [Leaders' Pledge for Nature](#), the [G7 Nature Compact](#), and other statements endorsed by CBD Party governments, for example, through the [Glasgow Leaders' Declaration on Forests and Land Use](#) or [recommendations of International Coral Reef Initiative](#) members. The post-2020 GBF must also ambitiously address the role of biodiversity conservation and our relationship with nature in pandemics of zoonotic origin, and their prevention. Therefore, the post-2020 GBF must:

- **Prioritize ecosystems in need of special attention:** WCS understands that Parties would like goals and targets to be universally relevant to all Parties. However, we remain concerned that such generalized goals and targets will eliminate references to certain types of ecosystems that are critical for global biodiversity and/or are threatened. Coral reefs, for example, are losing the attention of Aichi Target 10 and forests are losing specific references in Aichi Target 5. If goals and targets remain general, then these ecosystems, and others such as grasslands, peatlands, etc. as delineated through the [IUCN ecosystem typology](#), must receive significant attention in the monitoring framework, and be strongly supported through appropriate networks and platforms through 2030.
- **Help prevent the next global pandemic of zoonotic origin:** The COVID-19 global pandemic continues to cause extraordinary suffering and affect the lives of people around the world. The international community has widely recognized the contribution of biodiversity-inclusive One Health approaches to preventing the next global pandemic of zoonotic origin. GBF goals and targets must operationalize these statements of intent by committing to changes to exploitation, trade, and consumption policies of CBD Parties that negatively impact biodiversity or that present a risk of zoonotic pathogen spillover.
- **Include a robust monitoring framework and implementation mechanism.** A robust, clear set of indicators as part of the monitoring framework will support Parties in collectively achieving their goals. WCS has significant concerns with some of the headline indicators presented in [WG2020/3/3/ADD1](#), as well as lack of clarity regarding the process for discussing key indicators that fall into the component and complementary categories. A clear process must be established to allow for the adoption of a complete monitoring framework as part of the GBF at CBD CoP15, even if refinements will be made by CoP16.

Proposed Amendments: 2030 Mission (Paragraph 10)

WCS joins many partner organizations in recommending that Parties adopt a 2030 Mission aiming for a 'nature-positive' world that practically results in a net gain in the status of biodiversity and nature's contributions to people by 2030 (Locke et al. [2021](#)).

To this point, we are concerned about footnote 8 to the draft 2030 Mission, which states that putting biodiversity on a path to recovery "implies the need for a stabilization in the rate of loss of biodiversity." Parties should be aiming to halt and reverse the loss of biodiversity rather than to stabilize the rate of loss that will continue to threaten biodiversity and our own wellbeing.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for the 2030 Mission statement:

Proposed 2030 Mission: *“Take urgent action across society to reverse biodiversity loss and achieve a nature-positive world by 2030 for the benefit of planet and all people.”*

*Edited version: The mission of the framework for the period up to 2030, towards the 2050 vision is: “~~To take urgent action across society to~~ **reverse biodiversity loss and achieve a nature-positive world** ~~conserve and sustainably use biodiversity and ensure the fair and equitable sharing of benefits from the use of genetics resources, to put biodiversity on a path to recovery~~ by 2030 for the benefit of planet and **all** people”.⁸*

Proposed Amendments: 2050 Goals & 2030 Milestones (Paragraph 11)

WCS generally supports the scope and intent of the 2050 Goals and their 2030 Milestones, although we believe they need to be far more ambitious. We note that Parties expressed concern about the complexity of the framework, and we understand those concerns. However, the focus must be on the outcomes to be achieved by 2030, rather than 2050. We therefore support the continued inclusion of 2030 Milestones, or, preferably, shifting Goals to focus on 2030.

Our proposed amendments focus on Goal A and its Milestones in paragraph 11 of Draft 1.

- **Goal A, on conservation and restoration of biodiversity:**

WCS strongly supports the language on enhancing the integrity of all ecosystems in draft Goal A. Ecosystem integrity, which refers to the composition, structure, and function of an ecosystem in relation to its natural state (or natural range of variability) or reference state, and therefore its ability to deliver expected ecosystem functionality, is essential. Measuring ecosystem integrity (see box below) can be more complex than measuring extent (e.g., through remote sensing tools), but will capture key aspects of ecosystems including structural and functional connectivity. A Frequently Asked Questions (FAQ) document on ecosystem integrity is available [here](#) in most UN languages.

Note 1 on quantifying the goal: It will be challenging to arrive at an evidence-based number or percentage for increases in extent and integrity of different ecosystem types. WCS therefore recommends that Parties focus on a goal of net gain in ecosystem extent and integrity by 2030, at the global level, through a variety of conservation and restoration interventions across ecosystems and geographies. Measurements would vary by ecosystem type. However, there must be a footnote or glossary definition to ensure that net gain is not accomplished through unlimited reduction in ecosystem extent and integrity to be compensated through future restoration of integrity in other areas. We cannot achieve global net gain without retention of highly intact ecosystems (terrestrial, freshwater, marine) via protection and avoidance of degradation and loss, as discussed below.

Note 2 on ‘highly intact ecosystems’: Achieving a global enhancement, or net gain, in ecosystem integrity will require the retention of highly intact (or very high integrity) ecosystems at national and global scales, as well as restoration, where possible, around them. Retention of highly intact ecosystems is a key focus of draft Target 1. WCS’s updated proposals (below) strengthen the links between Goal A and Targets 1, 2, and 3 by using

consistent language. **“Highly intact ecosystems and other areas of particular importance for biodiversity”** is a way to standardize language across Goal A and Targets 1, 2, and 3, and builds on language as adopted in Aichi Target 11. It would also align with the concept of Key Biodiversity Areas and other tools that are used to identify important areas for biodiversity at the national level, which can include natural, semi-natural and productive ecosystems where they contribute to the persistence of biodiversity, while recognizing the unique role of highly intact natural ecosystems at a global scale.

With respect to the components of this goal addressing species conservation, WCS urges Parties to halt human-induced species extinctions by 2030. A rate-based target is not suitable, as it can be easily manipulated due to data collection and assessment and is insufficiently ambitious. WCS also strongly supports language on increasing species population abundance – or ‘keeping common species common’ [**note** native, non-invasive species, and not only those that thrive in degraded habitat] – as part of an overall effort to enhance ecological integrity.

With due consideration to the proposals made by Parties at virtual sessions of the OEIWG, WCS proposes the following for Goal A and its Milestones, as well as an alternate proposal for one 2030 Goal:

***Proposed Goal A (preferably for 2030):** The status of biodiversity and global ecological integrity is improved through rights-based conservation approaches that retain, restore, and connect highly intact ecosystems and other areas of particular importance for biodiversity; prevent the collapse of vulnerable ecosystems; halt species extinctions and increase the population abundance of native species; and maintain genetic diversity within species.”*

Should Parties wish to retain 2050 Goals and 2030 Milestones, the goal above would still be relevant, and the following are proposed as Milestones:

Milestone A.1: Net gain in the extent and integrity, including connectivity, of highly intact ecosystems and other areas of particular importance for biodiversity, including semi-natural or productive ecosystems where appropriate, and a reverse in the decline of ecosystems vulnerable to collapse.

Milestone A.2: Human-induced species extinctions are halted, the overall extinction risk is reduced by at least 20 per cent, and the average population abundance and distribution of native species across all trophic levels is increased on average by 20 percent.

Milestone A.3: An increase in the proportion of species that have at least 90 per cent of their genetic diversity maintained.

Headline indicators for Goal A:

WCS remains significantly concerned that the proposed headline indicators for Goal A focus only on the extent of ecosystems, rather than their integrity. This presents significant gaps, including (but not limited to) the fact that marine ecosystems are not always evaluated by their extent. Furthermore, the Species Habitat Index (A.0.4) that is proposed does not measure ecosystem integrity, does not address all species (e.g. marine species), and lacks peer review as noted in Party responses to the survey on headline indicators ([SBSTTA/24/INF/29](#)).

We see three possible ways to address this issue:

First, Parties could take advantage of tools that are available and globally standardized to evaluate the relative integrity, or intactness, of ecosystems. WCS recommends the Biodiversity Indicators Partnership (BIP)-approved [Ecosystem Intactness Index \(EII\)](#) [currently included as a.32], which measures the relative integrity of terrestrial ecosystems by using global datasets on anthropogenic pressures that cause a loss in the extent and/or integrity (condition) of terrestrial ecosystems. This indicator can be complemented by sub-global datasets, where appropriate, and by other measures in the marine realm (where similar standardized and pressure-based indicators exist).

Second, Parties could amend A.0.1 to refer to the “Extent *and integrity* of selected *natural and modified* ecosystems (i.e. forests, savannahs and grasslands, wetlands, *peatlands*, mangroves, saltmarshes, coral reefs, seagrass, *macroalgae* and intertidal habitats),” with the most appropriate indicator selected by ecosystem type. We recommend these ecosystem-specific options currently included at the complementary indicator level:

- The [Forest Landscape Integrity Index \(FLII\)](#): the first cumulative, spatially-explicit index that integrates global data on a) forest extent, b) localized, directly observable anthropogenic pressures, c) diffuse, anthropogenic pressures inferred based on proximity to localized pressures, and d) anthropogenic alteration of forest connectivity. The index can be scaled to jurisdictional or ecologically relevant boundaries, incorporate other relevant data, and is available at no cost to Parties for reporting.
- “Cover of live coral and other key benthic groups,” as proposed by the International Coral Reef Initiative and Parties in response to the survey on headline indicators during SBSTTA-24. This takes advantage of existing efforts at the national scale by CBD Parties as well as by the Global Coral Reef Monitoring Network (GCRMN) to support Parties in reporting on coral reef ecosystems around the world, and would effectively combine [ICRI-recommended indicators](#) a.13, a.14, a.20 and a.21 in the draft monitoring framework.

Third, Parties could adopt a placeholder headline indicator on ‘Integrity of selected ecosystems’ (see ecosystem types above) to be further refined by the ad hoc Technical Expert Group with due consideration to advice provided by technical experts and Parties.

2030 Action Targets (Paragraph 12)

WCS recommends the following proposals for Targets 1, 2, 3, 4, 5, 7, 8, 14, 18, and 19.

- **Target 1, on spatial planning and intact ecosystems:**

WCS strongly supports Target 1, which focuses on spatial planning and the retention of highly intact ecosystems as means to avoid land and sea use change as primary drivers of biodiversity loss. As described above, Goal A is not achievable without actions described

under Targets 1, 2, and 3 (among others).

Regarding the extent of spatial planning: WCS notes that some Parties expressed concern about full coverage of spatial planning (100% of land and sea areas). WCS strongly supports an ambitious target for comprehensive spatial planning, which can be accomplished by 2030 and is necessary to guide policies around conservation and sustainable use of biodiversity.

Regarding the language on “intact and wilderness areas”: We recognize that some Parties requested additional clarity on the definitions of “intact” and “wilderness” areas. WCS proposes that this language refer to a standard formulation that addresses the unique role of highly intact, or high integrity, ecosystems for biodiversity conservation and other global goals on climate change and sustainable development. However, we also recognize that terms like “intact” and “wilderness” imply a binary measurement that may vary in different contexts. We therefore recommend that Parties use consistent terminology of “highly intact,” which recognizes that intactness and integrity are measured on a continuum or spectrum, and that thresholds for “highly intact” will need to be identified and stated.

Finally, the target should seek integrated management, including any required policy change, rather than spatial planning alone.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, including the proposal made by WCS, TNC, and WWF, WCS proposes the following for Target 1:

***Proposed Target 1:** All terrestrial, freshwater, and marine ecosystems are subject to biodiversity-inclusive and rights-based spatial plans that ensure sustainable management, avoid degradation from infrastructure and other drivers of land and sea-use change, retain and restore highly intact ecosystems and other areas of particular importance for biodiversity, and secure the customary use and rights of Indigenous Peoples and local communities.*

- **Target 2, on ecosystem restoration:**

WCS welcomes Target 2, which is a new addition focusing on ecosystem restoration. Restoration efforts, where possible, around intact, functional ecosystems will be essential to achieve Goal A.

WCS has two concerns. First, when setting any quantitative target, it is essential that areas counting towards it actually achieve restoration objectives (rather than just being part of a pledge for future action). Second, restoration is a key conservation intervention but is secondary to conservation of existing biodiversity and retention of existing ecosystems. There is very weak evidence for full restoration of ecosystem integrity, including function, for a variety of ecosystem types, and this target should avoid perverse incentives that lead to negative outcomes for biodiversity – such as the planting of e.g. plantation or monoculture forests or afforestation of land not previously covered in forests.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 2:

Proposed Target 2: *[At least 20% of] degraded terrestrial, freshwater, and marine ecosystems are successfully restored, including through Indigenous and locally led initiatives, to appropriate baselines, contributing to global improvements in ecological integrity by connecting highly intact ecosystems and other areas of particular importance for biodiversity, preventing the collapse of vulnerable ecosystems, and increasing the population abundance of native species.*

- **Target 3, on area-based conservation measures (and ‘30x30’)**

WCS strongly supports Target 3, which presents a robust and evidence-based successor to Aichi Target 11 on area-based conservation measures.

WCS commends continued attention to qualitative aspects of area-based conservation, including the siting of area-based measures in important areas for biodiversity (including, but not limited to, areas recognized as Key Biodiversity Areas or Ecologically and Biologically Significant Marine Areas), and ensuring that they are effectively and equitably governed and managed, ecologically representative, and well connected.

Furthermore, WCS reiterates our position from SBSTTA-24 that *at least* 30% of global land and sea areas is the minimum amount needed to conserve biodiversity and ecosystem services necessary to deliver on Goals A and B, as well as broader objectives on climate change and sustainable development. WCS opposes those interventions from Parties that seek to bracket or reduce this figure.

Finally, we propose inclusion of the word “effective” before conservation, to demonstrate that while effective management may be measured in terms of certain inputs, effective conservation would be measured in terms of biodiversity, and ecological and social, outcomes.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 3:

Proposed Target 3: *At least 30 percent of terrestrial, freshwater, and marine ecosystems, especially highly intact ecosystems and other areas of particular importance of biodiversity, are effectively protected and conserved through equitably governed and managed, ecologically representative, and well-connected systems of protected areas and other area-based conservation measures that prohibit environmentally damaging activities, are integrated into wider landscapes and seascapes, and secure the customary use and rights of Indigenous Peoples and local communities, including their right to free, prior, and informed consent.*

We recommend at least two headline indicators for draft Target 3:

1. **Area (percent) coverage of protected and conserved areas**, at national and global scales, with key disaggregations, if those are maintained, to measure coverage of highly intact ecosystems and other important areas for biodiversity (e.g., through content-appropriate application of global standards such as Key Biodiversity Areas, Ecologically and Biologically Significant Areas, coral reefs, etc. where data are available).
2. **Effectiveness of protected and conserved areas**, which should ideally be measured in terms of ecological and social outcomes. Although the current headline indicator 3.0.1 appears to have a disaggregation according to the Global Database on Protected Area Management Effectiveness (GD-PAME), any PAME-related indicator must be further developed, perhaps using the IUCN Green List Standard, to document more than just whether PAME assessments have taken place. The information from those assessments should be standardized to enable global assessments of the efficacy and impact of area-based conservation measures. The niche for this headline indicator would be whether desired biodiversity outcomes at the site level have been achieved through area-based conservation measures.

- **Target 4, on species management and recovery**

WCS welcomes Target 4, which addresses proactive management actions to enable species conservation and recovery, thereby contributing directly to Goals and Milestones.

We continue to believe that a target addressing human-wildlife conflict is an important addition to the GBF. However, we would note that extirpation of a species from a given area could effectively reduce human-wildlife conflict. WCS therefore believes the target should be adjusted to seek co-existence of humans with healthy wildlife populations. We also believe that human-wildlife conflict may be preferable under Goal B than Goal A, because it more directly addresses the relationship between human beings and the broader environment.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 4:

***Proposed Target 4:** Implement active management actions to enable the conservation and recovery of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict while maintaining species populations.*

- **Target 5, on harvesting, trade and use of wild species**

WCS welcomes Target 5, which addresses threats posed to biodiversity and human and animal health from illegal, unsustainable, or unsafe exploitation and use of wild species. However, WCS believes the draft Target requires further clarifications to properly meet a central challenge of the post-2020 GBF: changing business as usual to avoid ecological collapse and the threat of future pandemics of zoonotic origin.

Pathogens, such as the virus that caused the COVID-19 pandemic, do not care about sustainability or legality of individual animals. Biologically sustainable or legal trade can threaten human or animal health as much as illegal or unsustainable trade (and sometimes

is an even greater threat). Although the clarification of the word ‘safe’ as referring to human health is welcome, it will be challenging to define appropriate thresholds of risk. Recognizing the toll of the COVID-19 pandemic, and that another such pandemic could be even worse, we suggest defining it as “posing no risk of pathogen spillover” in line with precautionary, science-based approaches.

We therefore strongly urge Parties to ensure that Target 5, as one of the targets intended to reduce threats to biodiversity, clearly states that exploitation of wild species should not be allowed unless it is demonstrably legal; biologically and ecologically sustainable; effectively regulated and enforced; and presents no risk to human or animal health.

Finally, WCS continues to strongly oppose a merger of draft Targets 5 (which deals with threats to biodiversity) and 9 (which deals with benefits from sustainable use) that would in any way reduce Target 5’s focus on eliminating the threats to biodiversity from overexploitation. The concepts in both are related (as are many goals and targets), however implementing the targets and measuring success will require different indicators.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 5:

***Proposed Target 5:** Ensure that the exploitation, trade and use of wild species is legal, sustainable, effectively regulated and enforced, and poses no risk of pathogen spillover to humans, wildlife, or other animals.*

We recommend three headline indicators for Target 5:

1. **Trends in illegal exploitation and trade:** We recommend building on proposed headline indicator 4.0.1, which has well documented data limitations, to develop a composite indicator that addresses terrestrial and marine species protected under both national law and the international protections under CITES and CMS.
2. **Trends in biological or ecological sustainability of legal exploitation and trade:** We recommend using IUCN Red List assessments of the conservation status and trends for species that are exploited commercially, including but not limited to those in international trade, or included on either the CMS or CITES Appendices.
3. **Elimination of exploitation and trade that presents a risk to human health:** We recommend that Parties report on the adoption of legislation or regulation to prohibit or tightly restricts domestic and international trade and markets in certain taxa, particularly birds and mammals, that present known risks for pathogen spillover.

● **Target 7, on pollution**

WCS welcomes Target 7, which addresses pollution from all sources that affects biodiversity, ecosystem function, and human health.

WCS acknowledges the historical focus on issues of excess nutrients, pesticides, and plastic, but we strongly encourage a reference to the need for more ambitious action on light and noise pollution, particularly underwater anthropogenic noise. This form of pollution has been the subject of discussion at several major intergovernmental meetings.

We have proposed an amendment that would balance the focus of this target across a wider range of pollutants and avoid numbers that may lack a scientific basis and therefore hamper negotiations. Ultimately, all pollutants should be reduced to levels that are not harmful to biodiversity and human health.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 7:

Proposed Target 7: Reduce pollution from all sources, including nutrients, pesticides, plastics, noise, and light, to levels that are not harmful to biodiversity and ecosystem functions and human health.

- **Target 8, on climate change**

WCS strongly supports Target 8, on mitigating the impacts of climate change on biodiversity.

WCS welcomes the quantitative element of this target being measured in tons of carbon dioxide equivalent, rather than a percentage of mitigation effort needed. This is more agnostic to activities undertaken outside of the mandate of the CBD and is more measurable for Parties at national and global scales and can inform nationally determined contributions under the Paris Agreement.

However, we urge Parties to pay attention to the mitigation *and* adaptation benefits of natural ecosystems. The quantitative element and headline indicator refer only to *mitigation* potential of nature; however, ecosystem-based approaches to climate change *adaptation* have already been recognized by CBD Parties and should be prioritized. Adaptation efforts must be equally prioritized in the GBF and associated interventions.

Finally, WCS recommends the use of the term “nature-positive solutions” as used in the 2030 Mission, supported by guidance on “nature-based solutions” as defined by IUCN and articulated through other guidance (Seddon et al. [2020](#)) but with a focus on positive biodiversity co-benefits.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 8 is:

Proposed Target 8: Minimize the impact of climate change on biodiversity by contributing at least 10 GtCO₂e per year to global climate change mitigation efforts through nature-positive solutions, including the conservation of natural carbon stocks, and by safeguarding and promoting critical ecosystem-based approaches for adaptation.

- **Target 14, on integrating biodiversity values into planning and policies**

WCS strongly supports Target 14, on integrating biodiversity into planning and policies at all levels and across all sectors.

All policies and investments should be subject to rigorous environmental and social impact assessment (project level and strategic and/or regional assessments where appropriate), including robust determination of cumulative effects. The goal of such assessments is to avoid or mitigate negative impacts on biodiversity, and to contribute to the overarching goals of the post-2020 GBF. Although Target 1 addresses this issue to some extent from a spatial perspective, there are a variety of additional interventions, including financial or sectoral safeguards, that can be used to avoid negative outcomes.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 14:

Proposed Target 14: Fully integrate biodiversity values into the assessment and implementation of policies and investments, at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows avoid negative impacts on biodiversity and are aligned with the goals of this framework.

- **Target 18, on eliminating harmful incentives**

WCS strongly supports Target 18, which addresses perverse incentives and harmful subsidies with negative impacts on biodiversity. We appreciate that this addresses both economic and regulatory incentives.

The language referring to “most harmful subsidies,” is wholly subjective. While some prioritization may be necessary, Parties should seek to eliminate *all* subsidies that are identified as harmful for biodiversity (with appropriate exceptions related to, for example, food insecure communities on a case-by-case basis).

While we support SMART targets, we are concerned that the US\$ 500 billion is an incomplete estimate, which may not include, for example, fossil fuel or mining subsidies with negative impacts on biodiversity. This amount is therefore a highly conservative estimate. Furthermore, dollar figures will change over time and therefore will most likely not be relevant by 2030. We therefore recommend that Parties explore possible alternative formulations. However, we have chosen to propose more ambitious US\$ figures in accordance with proposals made by most Parties during virtual sessions of the OEWG.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 18:

Proposed Target 18: Eliminate or redirect all incentives harmful for biodiversity in a just and equitable way, reducing them by at least [US\$ 600 billion] per year globally, and ensure that all incentives, including public and private economic and regulatory incentives, are positive for biodiversity.

- **Target 19, on financial resources**

WCS strongly supports Target 19, which addresses the need to increase financial resources for implementation of the Convention and the post-2020 GBF.

It should be specified that the financial resources must be available for the implementation of this framework, specifically, rather than *any* biodiversity-relevant expenditures (i.e. not all expenditures on fisheries may be in line with the objectives of this framework).

As in Target 18, we remain concerned that specific dollar amounts/figures rely on conservative estimates and will change over time; therefore, they may not be relevant by 2030. We recommend that Parties explore possible alternative formulations if possible. However, we propose more ambitious US\$ figures in accordance with proposals made by most Parties during virtual sessions of the OEWG.

Finally, achieving a comprehensive, ambitious and equitable post-2020 global biodiversity framework will require increased financial resources from all sources and from all Parties, but particularly from those countries where per-capita consumption creates disproportionate impacts on global biodiversity. Peer-reviewed research (Lenzen et al. [2012](#)) indicates that 30% of global threats to biodiversity are generated by international trade, particularly trade in commodities that are destined for use in developed countries. Notwithstanding the need to change production and consumption patterns, as well as the harmful incentives addressed by Target 18, WCS therefore believes that a greater proportion of global biodiversity finance should help to mitigate the impacts of a globalized economy on biodiversity in developing countries.

With due consideration to the proposals made by Parties at virtual sessions of the OEWG, WCS proposes the following for Target 19:

***Proposed Target 19:** Mobilize new and additional financial resources from all sources, making at least [US\$ X billion] per year being available for the implementation of this framework, including an increase to at least [US\$ X billion] per year in international, concessional financial flows to developing countries, while considering the need to leverage private finance, enhance national biodiversity finance planning, strengthen capacity-building, and directly support the relevant efforts of Indigenous Peoples and local communities.*

Draft elements of a decision operationalizing the post-2020 GBF

We recommend that the decision adopted at CoP15.2 operationalizing the GBF invite the UN General Assembly to consider any necessary updates to biodiversity-related targets and indicators under the Sustainable Development Goals in accordance with global commitments under the post-2020 GBF.

We also propose minor amendments to operative paragraph 19 to ensure that guidance is developed, in partnership with relevant intergovernmental treaties and partnerships, on how to implement the full suite of targets for specific ecosystem types. This is critical to enhance implementation for highly generalized goals and targets.

We therefore propose the following amendments to operative paragraph 14 and 19 of ([CBD/WG2020/3/3/ADD3](#)). Proposed amendments (additions and ~~deletions~~) are in red.

“14. Invites the General Assembly of the United Nations to take into account the post-2020 global

biodiversity framework and ~~the progress in~~ its implementation when monitoring progress towards the Sustainable Development Goals, and to consider any necessary updates to the targets and indicators used to measure progress against them;"

"19. Requests the Executive Secretary:

...

(c) To develop, including in partnership with relevant agreements, processes and organizations, guidance materials, including ~~the identification of possible actions~~ guidance for operationalizing ~~the~~ goals and targets and other elements of the post-2020 global biodiversity framework, including for specific ecosystem types."

Annex I. Summary Recommendations (Table Format)

<i>"Take urgent action across society to reverse biodiversity loss and achieve a nature-positive world by 2030 for the benefit of planet and all people."</i>			
Goal	Headline Indicators	Relevant Targets	Headline Indicators
<p>2030 Goal A. <i>The status of biodiversity and global ecological integrity is improved through rights-based conservation approaches that retain, restore, and connect highly intact ecosystems and other areas of particular importance for biodiversity¹; prevent the collapse of vulnerable ecosystems; halt species extinctions and increase the population abundance of native species; and maintain genetic diversity within species."</i></p>	<p>A.0.1 Extent of Select Ecosystems</p> <p>A.0.2 Integrity of Select Ecosystems</p> <p>A.0.3 IUCN Red List</p> <p>A.0.4 Living Planet Index</p>	<p>Target 1. <i>All terrestrial, freshwater, and marine ecosystems are subject to biodiversity-inclusive and rights-based spatial plans that ensure sustainable management, avoid degradation from infrastructure and other drivers of land and sea-use change, retain and restore highly intact ecosystems and other areas of particular importance for biodiversity, and secure the customary use and rights of Indigenous Peoples and local communities.</i></p>	<p>1.0.1 Percentage of land and seas covered by spatial plans that integrate biodiversity*</p> <p><i>[1.0.X Extent of highly intact ecosystems noting that this may align with Goal A indicators]</i></p>
		<p>Target 2. <i>[At least 20% of] degraded terrestrial, freshwater, and marine ecosystems are successfully restored, including through Indigenous and locally led initiatives, to appropriate baselines, contributing to global improvements in ecological integrity by connecting highly intact ecosystems and other areas of particular importance for biodiversity, preventing the collapse of vulnerable ecosystems, and increasing the population abundance of native species.</i></p>	<p>2.0.1. Percentage of degraded or converted ecosystems that are under restoration</p> <p><i>[2.0.X Integrity of ecosystems under restoration, noting that this may align with Goal A indicators]</i></p>
		<p>Target 3. <i>At least 30 percent of terrestrial, freshwater, and marine ecosystems, especially highly intact ecosystems and other areas of particular importance of biodiversity, are effectively protected and conserved through equitably governed and managed, ecologically representative, and well-connected systems of</i></p>	<p>3.0.1 Coverage of Protected areas and OECMS, with key disaggregations</p> <p><i>[3.0.2 Effectiveness of protected and conserved areas, noting that basic methodologies are available</i></p>

		<p><i>protected areas and other area-based conservation measures that prohibit environmentally damaging activities, are integrated into wider landscapes and seascapes, and secure the customary use and rights of Indigenous Peoples and local communities, including their right to free, prior, and informed consent.</i></p>	<p><i>but global standardization is required by TEG]</i></p>
		<p>Target 4. <i>Implement active management actions to enable the conservation and recovery of species and the genetic diversity of wild and domesticated species, including through ex situ conservation, and effectively manage human-wildlife interactions to avoid or reduce human-wildlife conflict while maintaining species populations.</i></p>	
		<p>Target 5. <i>Ensure that the exploitation, trade and use of wild species is legal, sustainable, effectively regulated and enforced, and poses no risk of pathogen spillover to humans, wildlife, or other animals.</i></p>	<p><i>[3.0.1 Trends in illegal exploitation and trade]</i></p> <p><i>[3.0.2 Trends in biological or ecological sustainability of legal exploitation and trade]</i></p> <p><i>[3.0.3 Elimination of exploitation and trade that presents a risk to human health]</i></p>
		<p>Target 7. <i>Reduce pollution from all sources, including nutrients, pesticides, plastics, noise, and light, to levels that are not harmful to biodiversity and ecosystem functions and human health.</i></p>	
		<p>Target 8. <i>Minimize the impact of climate change on biodiversity by contributing at least 10 GtCO₂e per year to global climate change mitigation efforts through nature-positive solutions, including the conservation of natural carbon</i></p>	

		<i>stocks, and by safeguarding and promoting critical ecosystem-based approaches for adaptation.</i>	
2030 Goal D. The gap between available financial and other means of implementation, and those necessary to achieve the 2050 Vision, is closed.		Target 14. <i>Fully integrate biodiversity values into the assessment and implementation of policies and investments, at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows avoid negative impacts on biodiversity and are aligned with the goals of this framework.</i>	
		Target 18. <i>Eliminate or redirect all incentives harmful for biodiversity in a just and equitable way, reducing them by at least [US\$ 600 billion] per year globally, and ensure that all incentives, including public and private economic and regulatory incentives, are positive for biodiversity</i>	
		Target 19. <i>Mobilize new and additional financial resources from all sources, making at least [US\$ X billion] per year being available for the implementation of this framework, including an increase to at least [US\$ X billion] per year in international, concessional financial flows to developing countries, while considering the need to leverage private finance, enhance national biodiversity finance planning, strengthen capacity-building, and directly support the relevant efforts of Indigenous Peoples and local communities.</i>	