WCS Recommendations: SBSTTA-25
October 2023

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Introduction to WCS

The Wildlife Conservation Society (WCS) 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, and conserve more than half of the world's biological diversity. We have active conservation programs in about 60 countries that work in partnership with governments, Indigenous Peoples, local communities, other conservation organizations, academia, the private sector, and other stakeholders on science- and evidence-based conservation efforts.

To learn more about WCS, please visit wcs.org, or for more on our engagement with the Convention on Biological Diversity (CBD) and the Kunming-Montreal Global Biodiversity Framework (GBF), please visit **www.wcs.org/cbd.** Please contact Alfred DeGemmis (adegemmis@wcs.org) with any questions about the content of this document.

WCS Recommendations on Select Agenda Items at SBSTTA-25

Note: *WCS strongly supports continued engagement by CBD Parties at the nexus of biodiversity and health, including the careful development of a trans-sectoral global Global Action Plan that is shared by multilateral fora and results in concrete changes to policy and practice that, among other outcomes, helps prevent zoonotic pathogen spillovers and the next pandemic of zoonotic origin. Although this is not on the SBSTTA-25 agenda, we look forward to intersessional consultations on the Global Action Plan.*

Agenda Item 3(a): "Monitoring framework for the Kunming-Montreal Global Biodiversity Framework"

Working document: CBD/SBSTTA/25/2

A comprehensive and functional monitoring framework is essential for Parties to finish developing and implementing their updated NBSAPs and national targets in accordance with the GBF. The GBF monitoring framework should take advantage of a wide variety of indicators,

including individual indicators and composite indicators/metrics that incorporate multiple indicators to provide the best possible measures of biodiversity status and our impacts.

With this in mind, WCS welcomes the work of the Ad Hoc Technical Expert Group ('Expert Group') on the GBF's monitoring framework, and we congratulate the co-chairs on their election. WCS has engaged with the online discussion forum, and our full recommendations on the draft monitoring framework can be found at the top of **www.wcs.org/cbd**. We urge the Expert Group to ensure that inputs provided through the online discussion forum, including by Observers, are synthesized into reports to the Parties and Observers at SBSTTA meetings and at CoP16.

Our three cross-cutting messages for the Expert Group and Parties are that:

1. We must identify linkages to fill gaps in and streamline the monitoring framework, including, for example, disaggregating Red List of Species trends for commercially exploited species to link Goal A and Targets 4 and 5, or tracking the extent and integrity of specific high-carbon ecosystems to link Goal A and Targets 1, 3, and 8.
2. We must clarify the relationship between individual and composite indicators, noting that both appear in the monitoring framework at present, but many of the composite indicators at the headline level - for example, the Red List of Ecosystems, will require inputs from the component or complementary level that assess ecosystems.
3. We must refine our indicator processes for ecological integrity, including by advancing conversations around individual and composite indicators, to develop clear guidance around national target setting and measuring progress on ecosystem conservation.

We note the discussion within this document on binary global indicators where there remains no agreed methodology. We have the following suggestions on select global/binary indicators:

- ***Target 1:*** Option (d) for 1.1(a) and 1.1(b) should be amended to read, *"Yes, fully, and it takes into account areas of high biodiversity importance and ecological integrity"*
    - ***Note***: As the objective here is to assess progress in addressing land- and sea-use change, we recommend the use of indicators related to the extent of natural ecosystems, or the use of a more nuanced indicator of human pressures on ecosystem integrity to assess the extent to which human activities are degrading, fragmenting, or altogether eliminating high integrity ecosystems/habitat.
- ***Target 8:*** Create a new question 8.2[bis]: "*Are the nationally determined contributions, long-term strategies, national adaptation plans and adaptation communications of your country aligned with its biodiversity strategies and action plans?*"
    - ***Note***: Some questions for the proposed global indicator are broad and easily satisfied. Discussion of ways to frame this question that looks not only at the mention of biodiversity but the coherence of plans and solutions would be more appropriate. We must use the monitoring framework to assess the *alignment* of comprehensive national strategies on climate and biodiversity. When there are synergies or co-benefits -- e.g., protection of carbon-rich areas intersecting with important areas for biodiversity – positive outcomes for addressing both challenges are more likely. Without coordinated attention, however, the opposite can occur, with persistent harms to biodiversity and sustained provisioning of nature's contributions to people: for example, through direct mortality (e.g., to bats and birds from wind turbines or fish through hydropower turbines), and the loss and degradation of habitats, ecosystems and carbon stocks (e.g., from

renewable energy infrastructure and mining of critical minerals, particularly in carbon-rich ecosystems).

- ***Target 9:*** We urge Parties to reflect on the substance of some questions. Every Party will have some domestic management of species, so the answer to question 9.1 is likely to be 100 percent achieved. These questions are appropriate for reflection by SBSTTA.

Finally, we would encourage Parties to consider the relevance of global/binary reporting for additional elements of select Targets. Target 5, for example, calls on Parties to minimize impacts on non-target species and reduce the risk of pathogen spillover. Simple reporting on measures (particularly legislative and regulatory) taken to reduce the risk of pathogen spillover from wildlife markets can provide a sense of global response to the threats posed by epidemics and pandemics of zoonotic origin.

Pending the amendment of the annex with respect to the comments above, we have no additional amendments to propose for the SBSTTA recommendation in part IV at this time.

Agenda Item 3(b): "Mechanisms for planning, monitoring, reporting and review"
Working document: CBD/SBSTTA/25/3

WCS strongly supports a periodic global review of progress for the GBF that builds on national reporting processes as well as other scientific, evidence-based inputs.

The Global Biodiversity Outlook series has provided valuable contributions and it is not impossible for the format and process of such reports to change while retaining this name. A new global review would need to address every goal and target comprehensively, noting where gaps in data hinder our analysis and where ambition at the national level falls short of global ambitions. Fundamentally, it must remain technically credible – meaning that its findings and recommendations must be evidence-based and not subject to political interference. This doesn't mean, however, that Parties cannot be involved in an advisory role, particularly to ensure that all relevant data from Parties are located and incorporated into the report's findings.

A global review of progress should also steer away from being a 'laundry list' of different individual findings and instead strive for *cumulative* analysis and impact. The conceptual framework provided by concepts like ecological integrity – that an ecosystem's composition, structure, and function *collectively* dictate its contributions for both biodiversity and people – can help us assess the current and projected contributions of nature to reverse biodiversity loss, halt climate change, and achieve sustainable and equitable development. We therefore recommend that concepts such as ecological integrity guide our assessment of global progress on reversing biodiversity loss. The inclusion of ecological integrity and similar concepts in Goal A such as connectivity should facilitate this type of cumulative review, and a political response.

We have no proposed amendments to the draft SBSTTA recommendation in part V at this time.

Agenda Item 3(c): "Approaches to identifying scientific and technical needs to support the implementation of the [Global Biodiversity] Framework, including its implication for the programmes of work of the Convention"
Working document: CBD/SBSTTA/25/4

We generally support the process undertaken by the CBD Secretariat to identify knowledge gaps and to adjust programmes of work to develop guidance in these areas for consideration by

SBSTTA-26, SBI-4, and CoP16. We note that the programs of work are not only about addressing gaps in guidance, they are about facilitating the implementation of the GBF by Parties through the *uptake* of available guidance. They are also responsible for examining interactions – for example between business, agriculture/aquaculture, and protected areas.

With respect to the findings of the rapid analysis of gaps, we note the following:

- Paragraphs 17(a) and 17(i) are linked, particularly as it regards land- and sea-use planning that guides or impacts agricultural conversion of terrestrial ecosystems (the leading driver of terrestrial biodiversity loss) or the regulation of marine capture fisheries (the leading driver of marine biodiversity loss). It is essential to note only ensure that guidance on topics such as marine spatial planning exists, but rather that barriers to use in a national context, such as gaps in technical capacity, translation into practical languages, or guidance on balancing competing uses of terrestrial or marine areas, are accounted for.
- Paragraph 17(e) addresses the gap in *"guidance on excess nutrients, pesticides and highly hazardous chemicals in the context of various biomes..."* which is critically important. Recognizing that there are a variety of pollutants, including things like sedimentation, that affect some ecosystem types like coral reefs, we would encourage this analysis to include the identification of additional pollutants that might be creating unique impacts on different biomes.

We also note that several key concepts outlined in Section C and reflected throughout the GBF are missing from this list. For example, how can the GBF be implemented in ways that are fully "respecting, protecting, promoting and fulfilling human rights" (7(g)) and "with consideration of the One Health Approach" (7(r)). These are relevant to the entire framework, but do not necessarily have guidance that is GBF-specific. This must be remedied, either through ongoing processes (such as the development of a Global Action Plan on Biodiversity and Health) or through dedicated programmes of work.

On the broader question around programmes of work led by the CBD Secretariat, we would recommend updating them around key interrelated topics. For example, the Targets 1-3 Partnership, to be launched formally at SBSTTA-25, is an opportunity to look across the interrelationship between planning, conservation, protection and restoration of areas/ecosystems, including their metrics. We therefore urge the programme of work on protected areas to reflect this broader scope, build on the momentum of partnerships such as this, and to try and capture several relevant portions of the GBF to maximize overall implementation. As the GBF's generalized structure loses specific mention of marine ecosystems, there is still an opportunity to highlight such ecosystems as cross-cutting issues via a programme of work on, for example, marine and coastal biodiversity.

With regards to the draft SBSTTA recommendation in part VI, we propose the following amendments:

- Delete sub-paragraphs under paragraph 3 to avoid negotiating each of these in detail during the upcoming SBSTTA meeting.
- [If the above approach is not preferred,] amend paragraph 3(a): *"Guidance on biodiversity-inclusive land-use planning, including the identification of high biodiversity areas and those with high ecological integrity, that identifies how to avoid negative impacts on biodiversity (Target 1)"*

Agenda Item 4: “”Findings from the assessments by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services and the Intergovernmental Panel on Climate Change and their implications for the work undertaken under the Convention”
Working documents: CBD/SBSTTA/25/6 (Valuation of Nature); CBD/SBSTTA/25/7 (Sustainable Use); CBD/SBSTTA/25/8 (IAS); CBD/SBSTTA/25/9 (Climate Change)

Sustainable Use

We note comments made by Observers in recent meetings of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) that the process for incorporating views from individual experts in the final Assessment was not clear and did not result in any changes to some of the draft Assessment chapters. We therefore urge Parties to treat the final assessment and its summary for policymakers with caution, as it may not represent the full scope of expertise or views available.

We strongly concur with paragraph 30(d) of SBSTTA/25/7 that the “conceptualization of sustainable use is constantly evolving over time” and that the concept is “best operationalized through a specific set of targets or indicators subject to periodic reviews.” The GBF - including Targets 5 and 9 - provides an important platform for such a discussion of our key metrics and global reviews of progress towards both protecting customary sustainable use and averting the loss of biodiversity by addressing use that we know is not sustainable. At the same time, well developed metrics can facilitate conversations around whether the value from sustainable use accrues to those communities living alongside and sustainably managing biodiversity and wildlife, or whether value is accruing elsewhere and creating perverse economic incentives.

Finally, we note the findings in the IPBES Assessment that the *intensification* of existing forms of sustainable use “create novel interfaces that influence disease risk” and that a shift from exploitation of wild species to specimens derived from farmed stocks of the same species of plants or animals has unexplored risks on “welfare of farmed animals, potential introduction of invasive alien species and potential transmission of zoonotic diseases” that require further consideration. The linkages between sustainable use and potential health risks from disease resulting from, for example, spillover of zoonotic pathogens, must be explored further through forums such as SBSTTA and other technical bodies such as IPBES.

With regards to the draft CoP16 decision in paragraph 31 (part V), we propose the following:

- Amend preambular paragraph 1 to read: “*Recognizing that ensuring the sustainability~~le~~ of use of wild species is critical to bending the curve of biodiversity loss and therefore well embedded in the work undertaken under the Convention on Biological Diversity…”*
- Retain sub-paragraphs (b), (i), (j) and particularly (m) in paragraph 4 of the draft CoP16 decision. Sub-paragraph (m) would benefit from *explicit* alignment with ongoing work on zoonotic pathogen spillover and zoonoses taking place within other biodiversity-related conventions, such as CMS, as well as discussions taking place on a new instrument related to pandemic prevention, preparedness, and response taking place under the auspices of the WHO.

Climate Change

The IPCC’s Sixth Assessment Report is alarmingly clear on the impacts of climate change on biodiversity, with “substantial damages, and increasingly irreversible losses, in terrestrial,

freshwater, cryospheric, and coastal and open ocean ecosystems," and "hundreds of local losses of species have been driven by increases in the magnitude of heat extremes." It furthermore notes that "hard and soft limits to adaptation have been reached in some ecosystems and regions," and "global financial flows for adaptation are insufficient for, and constrain implementation of, adaptation options, especially in developing countries." We are on track to irrecoverable losses of biodiversity, even in some of the most biodiverse regions, under projected climate change scenarios.

Biodiversity, including ecosystems and the species that comprise them, can be a critical part of the solution to climate change mitigation (as detailed in Part III-IV). However, without rapid declines in the extraction and combustion of fossil fuels, we will continue to experience negative outcomes for biodiversity and fail to achieve the GBF (see agenda item 7, below). Science is clear that as we consider the potential for nature-based, nature-positive (and equitable) solutions to climate change, we need to consider the relative value of different interventions. We know that the conservation – or the avoided degradation/conversion - of high integrity forests and other high-carbon ecosystems such as peatlands are essential if we are to meet the objectives of both the GBF and the Paris Agreement (see Part III). However, the pathways to realizing this at national and global scales are less clear.

The role of ecological integrity in ensuring climate regulation and biodiversity persistence may be of value for further consideration by SBSTTA, in partnership with the IPCC and IPBES. Science is clear that forests of higher ecological integrity provide greater contributions to locally and globally important ecosystem services, and can influence both mitigation and adaptation outcomes.

With regards to the draft CoP16 decision in paragraph 35 (part VII), we propose the following:

- Add a new "*4bis. Recognizes that ecological integrity influences the potential for ecosystems, including high carbon ecosystems, to be essential for climate change mitigation and adaptation, and urges further consideration of this important dimension of biodiversity by the Intergovernmental Platform on Biodiversity and Ecosystem Services and the Intergovernmental Panel on Climate Change;*"

Agenda Item 6: "Sustainable Wildlife Management"
Working document: CBD/SBSTTA/25/11

WCS has a long history of species conservation, including playing a role in the recovery of several iconic species on land and in the ocean. We therefore welcome the inclusion of species and wildlife-focused Targets 4, 5, and 9 in the GBF, and stress the interrelationship between achievement of these targets and successfully achieving other ecosystem or area-based targets. WCS is pleased to contribute to discussions of sustainable wildlife management and particularly the advancement of improved practices to reduce the impacts of wild meat consumption on wildlife populations through our role in the Sustainable Wildlife Management (SWM) Programme that we implement with FAO and other members of the consortium.

In reading paragraph 2, WCS is eager to note that Target 5 also specifically calls for "minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spillover." We note that efforts to advance the Voluntary Guidance for a Sustainable Wild Meat Sector, such as "reducing demand for unsustainably managed and/or illegal wild meat in cities and towns" (paragraph 3) may contribute to efforts to minimize the risk of pathogen spillover from wildlife.

More broadly, we note that the distinction between promoting sustainable use and ensuring the sustainability of use where people and rights holders elect to do so should be treated carefully.

With regards to the potential SBSTTA recommendations on *"areas beyond the wild meat sector that might require complementary guidance, in particular those summarized in paragraph 45,"* as addressed in part IV of the Document 25/11, we broadly support these areas and would be glad to contribute our technical expertise to the development of future guidance. We strongly support further examination of the interactions between harvesting of terrestrial and marine species for consumption and for other purposes, such as the pet trade, which affects thousands of species (as evidenced across multiple proposals to amend the CITES Appendices in 2022). We also support further examination of the extraction of aquatic species for food and other purposes, as well as an examination of unexplored health risks associated with current patterns and practices of sustainable use.

With regards to the potential SBSTTA recommendation in paragraph 51 (part IV), we propose the following:

- Amend paragraph 51(c): *"Recommend to the Conference of the Parties to request that the Executive Secretary, with the support of the Collaborative Partnership on Sustainable Wildlife Management and technically qualified organizations and experts, prepare draft complementary guidance on those areas."*

Agenda Item 7: "Biodiversity and Climate Change"
Working document: CBD/SBSTTA/25/12

WCS was disappointed in the outcome of CBD CoP15 on the dedicated biodiversity and climate change agenda item, and we support submissions of Canada, the EU, Norway and the UK that the previous negotiated text should be noted when developing a new draft decision for CoP16. We welcome contributions of Parties, including the comments of Canada, China, the EU, Japan and the UK that the GBF's Target 8 and related targets (e.g., Targets 1-3, Target 11) addressing climate change should be fully implemented and take into account synergies and potential conflicts with the Paris Agreement. This includes, but is not limited to, recognizing projected impacts of climate and planning biodiversity conservation interventions appropriately (e.g., by focusing efforts under Target 3 on climate-resilient areas for vulnerable ecosystem types).

Other comments in the synthesis of inputs, including the comments that financial mechanisms should maximize transparency on the purposes and impacts of financial flows, and that we can fill a gap in guidance on ecosystem-based approaches for climate change mitigation, should be considered in more detail during SBSTTA. These are critical issues.

WCS and our partners advocate for a nature-positive world, where our economic development and solutions to climate change result in the maintenance or enhancement of global ecological integrity, including in "high-carbon" ecosystems. We support the recommendations of Canada, the EU, Japan, and the UK to explore the potential for discussions on nature-based solutions to assist with mobilizing funding for implementation of the GBF and, critically, for mainstreaming biodiversity into sectors such as health and agriculture. WCS does support nature-positive and equitable 'nature-based solutions' in line with definitions adopted by UNEA, but we agree strongly with the comment from the EU that no nature-based solutions can replace immediate and deep decarbonization of our economies to reduce greenhouse gas emissions. We will fail to implement the GBF if we do not reduce our dependence on fossil fuels.

We must ensure that the draft decision for CoP16 on biodiversity and climate change does the following: a) recognizes that achievement of the Paris Agreement and the GBF are interdependent; b) explicitly calls for synergies and coherence between national climate and biodiversity strategies, action plans, and commitments; c) seeks greater coherence between global stocktakes and associated metrics for climate and biodiversity; and d) drives synergistic expenditures while recognizing that these are interlinked but distinct crises that will require different types of investments and interventions.

With regards to the draft CoP16 decision in operative paragraph 4 of the draft recommendation in part IV, we propose the following:

- Retain language in paragraph 2 that *"achievement of the goals and mission of the Kunming-Montreal Global Biodiversity Framework is not possible without urgent and effective action on climate change in line with the Paris Agreement."*
- Amend the language in paragraph 3 to say that *"reducing the loss of natural ecosystems, particularly those with the highest ecological integrity and carbon stocks, is among the most important options in terms of potential magnitude and cost-effectiveness."* The integrity of ecosystems dictates their contributions to global and local climate regulation.
- Retain language in paragraph 4(b) that Parties should *"ensure synergies with other national planning processes, including existing, new and updated nationally determined contributions and national adaptation plans, as appropriate."*
- Add language requesting the Executive Secretary to work directly with the UNFCCC Secretariat to develop guidance on synergistic implementation of the Global Biodiversity Framework and the Paris Agreement.