



**RECOMMENDATIONS FOR THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK.**

**PREPARED FOR: FOURTH MEETING OF THE OPEN-ENDED WORKING GROUP (OEWG 4),  
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Formed in February 2020, the African CSO Biodiversity Alliance (ACBA) provides a platform for African CSOs to speak with one voice on issues of Sustainable Use of nature. Our vision is that [Africa's biodiversity thrives and underpins equitable, socially and economically resilient livelihoods based on the rights of people to sustainably use their natural resources.](#)

## African CSO Voices on the Post-2020 Global Biodiversity Framework

The African CSOs Biodiversity Alliance (ACBA) commends the secretariat of the Convention on Biological Diversity, as well as co-chairs of the Open-Ended Working Group on the Post2020 Global Biodiversity Framework for preparing the necessary documents to advance negotiations on the new deal for nature and people.

### Overarching comments:

In the 2011- 2020 strategic plan, no Aichi Target was met, while only 6 sub-targets (of 58) were met ([Global Biodiversity Outlook 5](#)). Two of these sub-targets focused on areas under protection, and succeeded partially due to a singular focus on meeting these two targets from about 2015-2020. However, while protected areas were gazetted at increasing scale and speed, commensurate improvements in management effectiveness were not made, and many conflicts with communities neighboring PAs have either arisen, or remain as critical issues from the past. The focus on expanding PAs may even have been a ‘red herring’ strategy, enabling failures in more important aspects of conservation to go unnoticed - such as stopping the drivers of nature’s decline, or of inequitable implementation of conservation in some protected areas, and failures to support sustainable use and equitable benefit sharing to the extent needed.

### *ACBA supports an integrated approach over an ‘apex target’ approach.*

ACBA’s core focus is on sustainable use, which is inherently site and context specific, and requires integrated delivery of all three objectives of the Convention (and Goals A-C of the GBF) to be successful. ACBA has proposed a ‘[shared earth, shared ocean](#)’ framework to support implementation, representing a paradigm shift connecting people with nature locally, and distancing from the classical approaches alienating people from nature. Its four principles include:

1. The focus is on the local scale,
2. Equity principles ensure needs and rights of people are met, prioritizing local institutions and rights holders, assisted by governments, organizations, scientists and others.
3. All relevant knowledge is integrated at this level, including local and traditional knowledge, accumulated experience, social and cultural concerns and scientific knowledge (translated to this scale using platforms that can help assure consistency to larger scales), and
4. All relevant targets of the GBF are addressed jointly as none can be achieved in isolation.

A consequence of this approach is that all areas irrespective of their condition - from degraded to intact, are managed in a way that contributes to conserving biodiversity and supporting human well-being.

**Box.** ACBA’s **shared earth-shared ocean** vision is particularly useful for implementation of the GBF in two types of areas:

*intact but unprotected areas*, to strengthen focus on local governance and management that secure rights, maintain intactness and guarantee benefits obtained from nature.

*‘shared’ spaces/mixed land/seascapes* with a mosaic of altered and natural (or semi-natural) habitats, to:

identify and secure 20% of the land/seascape most suitable for securing intact habitat that can meet peoples’ needs and conservation objectives;

if needed, restoration actions that assure this area meets integrity criteria for conservation on relevant timelines into the future,

identify and secure benefits to people from both 20% and 80% fractions of the land/seascape,

assure activities in the remaining 80% are not detrimental to health of the whole.

In both types of areas, planning ‘from the ground up’ applying all relevant knowledge to meet agreed local contributions to higher level targets (both GBF and SDG, and other relevant ones) can be integrated with similar planning over all local units to meet national contributions to global targets.

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## ACBA's comments on specific targets:

- **Target 1: Ensure that all land and sea areas globally are under integrated biodiversity-inclusive spatial planning addressing land- and sea-use change, retaining existing intact and wilderness areas.**

There is a need to describe, in concrete/practical terms, what “*integrated biodiversity-inclusive spatial planning*” is. The definition of spatial planning in the glossary does not include what we should understand by “integrated spatial planning” vs “biodiversity-inclusive spatial planning”, nor does it make clear that planning must be fully inclusive and equitable, to ensure central planning is not used to undermine the rights of Indigenous peoples and local communities. Also, the description of the term does not specify the requirements e.g., data on biodiversity value, which are limited in many African countries. ACBA notes that planning alone is not enough, it must be accompanied with implementation, hence proposes to add the word management. We further note that “biodiversity-inclusive” does not guarantee prioritization of biodiversity and as such, encourage any spatial planning and management to prioritize biodiversity.

*Alt target 1: “By 2030, ~~ensure that~~ all land and sea areas are under integrated biodiversity inclusive planning and **management** addressing land and sea-use change”*

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- **Target 2: Ensure that at least 20 percent of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems.**

It is critical that this target is implemented through a collaborative effort with IPLCs to ensure that the identification of degraded ecosystems, as well as the restoration benefits both the environment and the people that rely on them by restoring critical ecosystem services. What is important here, is to have a shared understanding of what is meant by restoration and how identified areas for restoration are likely to contribute to halting biodiversity loss through addressing all drivers.

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- **Target 3: Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes**

Aichi Target 11 succeeded partially on area gazetted (of land and sea), but failed on meeting sub-targets for connectedness, ecological representation, effective and equitable management. ACBA is of the view that implementing those sub targets is of priority and that this target must include strong principles of equity and tenure rights of indigenous peoples and local communities. ACBA is concerned that as with Aichi Target 11, excessive focus on meeting just the quantitative area element of this target will result in the other elements being un-met, in particular with respect to the rights and responsibilities of IPLCs. Given the continued human rights violations in current protected areas in the region, there is also a broader concern about the possible impact of protected area expansion on human rights and the need to build measures to prevent this. Inclusion of a clause “and other effective area-based conservation measures” goes some distance to recognizing IPLC rights, but this is not yet clear as not all IPLCs recognize the validity of OECMs as currently defined by IUCN. ACBA strongly advocates that ambition on Target 3 is implemented through locally-driven approaches such as the shared earth/ocean approach (see box) to assure all interests are met in an equitable way. Critical to effective management is good governance and participatory processes as well as protection of the rights of IPLCs.

ACBA recognizes that while this is a global target and some countries are well placed to achieve it, some are not, and hence, it is necessary to make it clear that it shall be implemented in accordance with national circumstances.

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*Alt Target 3: Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes, giving effect to the rights of Indigenous Peoples and local communities.*

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- **Target 5: Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.**

All targets and goals need to be consistent with the Convention and what it seeks to achieve. We therefore argue against any efforts to weaken this target and by default, undermine the second objective of the Convention which is on ensuring sustainable use. We reject the use of terminology such as “eliminate/prevent/regulate” the use wild species as reflected in Part 2 of the OEWG 3 report. These words are founded in the notion that local people cannot sustainably use resources and sustainable use is therefore misclassified as over exploitation. It is widely recognized that IPLCs, more than any other group, understand the complexity of managing biodiversity.

The target as currently framed, does not address indigenous and customary interests and rights, which are critical in many instances of wild species harvest. To assure that indigenous and other customary uses of nature that may not be defined under legal systems, but that are sustainable and safe for nature, are included, the word ‘equitable’ must be added.

*Alt target 5: The harvesting, trade and use of wild species is legal, sustainable, non-detrimental, safe for human health and equitable’ while respecting rights of Indigenous peoples and local communities*

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**Target 8: Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.**

The world recognizes that it is not possible to address the climate and biodiversity loss crises separately. Further, climate change has significant impacts on biodiversity and therefore, the main response to climate change has to be reducing greenhouse gas emissions. Any other solutions to climate change should not cause harm to biodiversity but lead to the resilience of people and biodiversity. There is also a need to learn from local experiences of how to mitigate and adapt to climate change.

While the adoption of the definition of Nature-based Solutions (NbS) by UNEA-5.2 was a positive development, it does not obligate its adoption in the context of the GBF. Real concerns remain as to how nature-based solutions are applied. They are not currently framed as solutions to biodiversity loss, but rather to climate change mitigation and adaptation. We need to find the balance to ensure that all interventions (irrespective of what they are called/termed), do not harm biodiversity in the long term.

*Alt target 8: Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation including through ecosystem-based approaches contributing at least 10 GtCO<sub>2</sub>e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity.*

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**Target 9: Ensure benefits, including nutrition, food security, medicines, and livelihoods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities.**

This target is important for ACBA as it is an anchor for sustainable use and potentially creates a balance between the three objectives of the convention. The target currently focuses only on benefits to people and yet ecosystems have other benefits that may not directly benefit people. This target is linked to target 5 on sustainable use. There is no merit in singling out “customary sustainable use”, as all use must be sustainable irrespective.

*Alt Target 9: Ensure benefits for people and biodiversity, including nutrition, food security, medicines, and livelihoods for people especially for the most vulnerable through sustainable management of wild terrestrial, freshwater and marine species and protecting ~~customary sustainable~~ use by indigenous peoples and local communities.*

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- **Target 10: Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.**

Fisheries are excluded from this target. While they may be addressed in Target 5 it may be strategic to include ‘fisheries’ in the list of sectors here. This also reflects that Aichi target 6, which specified fisheries has no direct successor in the GBF. The rights and roles of small-scale food producers (farmers, fishers, pastoralists, etc.) are not currently recognized in the GBF, and ACBA strongly advocates for inclusive language assuring their interests are recognized and met. ACBA firmly believes that it is important to focus on resilience rather than productivity and therefore propose the removal of reference to productivity.

*Alt target 10: Ensure all areas under agriculture, aquaculture, **fisheries** and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the ~~productivity and~~ resilience of these production systems **while respecting the needs of small-scale food producers.***

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- **Target 15: All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal**

This target should include the element of holding business and financial institutions to account and be legally responsible for any negative impacts of their investments on biodiversity and human rights. Public policies and regulations should be put in place so that all business and economic activities do not harm biodiversity. State intervention should include legally binding safeguards so that business and financial institutions are not left to self-regulate and report and that they operate within planetary boundaries. Negative environmental impacts of business activities are not confined to national boundaries hence there needs to be a transboundary approach. There is also a need to protect the rights and life of environmental defenders which are being violated standing up for biodiversity against corporate projects.

ACBA further notes:

- a) This needs to be supported by appropriate regulatory and business environments to avoid unfair competition of business in the South vs North.
- b) The need to promote sustainable businesses in the informal sector that are often based on biodiversity.
- c) The need to promote businesses that are led by women, youth and other vulnerable groups.

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- **Target 16: Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, where relevant the overconsumption, of food and other materials.**

This target language completely ignores the need to eliminate systemic unsustainable consumption practices and patterns. It places all responsibility for action on individuals, and away from the companies and producers delivering consumer goods, and the market-based economies that reward unsustainable business practices. The reality in areas with constrained incomes, purchasing is dictated primarily by price point. Thus, it is unfair given that most people do not have fair and equitable access to information and power, which are key enablers for people to be able to make these changes. From an African perspective individual consumer agency is limited and citizens are vulnerable to global supply chains and weak regulations. Hence, companies have the power and means to ensure that supply chains are better regulated with legally binding provisions.

Overconsumption of food and materials is mentioned with the caveat “where relevant”. It is not clear what the caveat relates to, as overconsumption in some economies reflects inequities in the distribution of food and materials among people and in some cases countries - and may cause shortages in some places. We advocate for “where relevant” to be deleted, as overconsumption, wherever it occurs, places unnecessary pressures on biodiversity, often with tele-coupled impacts in other locations, and maintains inequalities in access to and benefits from nature. Overconsumption may also include strong equity dimensions, where resource capture into wealthier economies and sectors is done at the cost of poorer economies and sectors. Eliminating these inequalities will be essential to achieving the GBF and needs to be supported by strong language.

*Alt target 16: Eliminate unsustainable consumption patterns and ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, ~~where relevant~~ all overconsumption, of food and other materials.*

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**Target 18: Redirect, repurpose, reform or eliminate incentives harmful for biodiversity in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.**

Dismantling the regime of subsidies that have led global development over recent decades is critical to transforming incentives away from damaging nature. African countries should be fully supportive of eliminating all subsidies that damage natural systems on the continent (and globally), while also needing to protect, nurture and grow domestic businesses and economies within planetary boundaries. In both cases, subsidy regimes that degrade nature, or that promote activities that damage the interests of local communities and IP should be stopped, and incentives reformed to rebuild nature and the rights and actions of IPLC and disadvantaged communities or countries.

The big assumption to eliminating harmful subsidies is that people will change their behaviors significantly as these harmful subsidies are linked to unsustainable consumption patterns in developed countries. For any change to happen governments, especially from the global North, must show leadership and commitment to confront the culture of overconsumption.

*Alt target 18: Redirect, repurpose, reform or eliminate incentives harmful for biodiversity in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and repurposing the funds to stimulate sectors that are nature-positive.*

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**Target 19: Increase financial resources from all sources to at least US\$ 200 billion per year, including new, additional and effective financial resources, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.**

We acknowledge that in Part 2 of the OEWG 3 report, this target has been split into two - 19.1 focusing on financial resources and 19.2 focusing on other resources. We further note that the composite text of 19.1 is very complex. While all components of it are important, we believe that some need to be contained in the resource mobilization strategy that is being developed and not necessarily in the target as all targets need to be SMART. We however offer the following insights on resource mobilization.

The ability of African and other developing country parties to address the biodiversity crisis is hampered by inadequate financing and other means of implementation. Securing adequate, predictable and sustainable financing from a variety of sources is essential. Therefore, financial resources should match the ambition level to implement the GBF. The target should be formulated and implemented in line with article 20 of the Convention and the principle of common but differentiated responsibilities.

It is critical that funding gets to where biodiversity conservation is yielding positive outcomes to people and nature. Large scale and multi-lateral funding processes are complex, requiring intermediaries and hence favours sophisticated and large NGOs. Current financial mechanisms are therefore difficult to access for indigenous peoples and local communities, for women, youth and other disadvantaged groups and for national organizations. Targeted financial mechanisms to support community and national conservation efforts should be expanded, such as the GEF Small Grants Programme. Furthermore, short funding cycles are not aligned to the long-term nature of biodiversity conservation or societal resilience investments, and the decadal goals and targets of the GBF.

ACBA notes that US\$ 700+ billion is needed per year for biodiversity. Through mainstreaming biodiversity (Target 14 and aligning financial flows), achieving Target 19, and repurposing harmful subsidies (Target 18, about US\$ 500 billion annually) a figure closer to US\$ 700 billion could be achieved, and this target should drive ambition to this level. Related to this, ACBA considers a fair, equitable & meaningful conclusion to DSI an additional potentially innovative source of conservation financing within the context of ABS.

With respect to other resources, the focus is on technology horizon scanning, monitoring and assessment. This target should focus on monitoring development of new technologies so that any future risks to biodiversity are addressed. There should also be efforts to bring formal science and traditional knowledge close together so that existing knowledge systems, practices and technologies that are conserving biodiversity can be monitored, promoted and scaled up.

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