



Recommendations for the Post2020 Global Biodiversity Framework. Prepared for: SBSTTA 24, SBI 3 and OEWG - March 2022

About ACBA

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 Post2020 Global Biodiversity Framework

The African CSOs Biodiversity Alliance commends the secretariat of the Convention on Biological Diversity, and the co-chairs of the Open-Ended Working Group on the Post2020 Global Biodiversity Framework for preparing documents to advance negotiations on the new deal for nature and people. We welcome the 1st draft of the Post2020 GBF and recognize that it represents improvement from the updated zero draft. Most notable, is the inclusion of quantities on targets as this gives an opportunity for another layer of consultations premised not only on the elements of the targets, but also on the proposed quantities.

We commend that targets 1 to 8 address all the direct drivers of biodiversity loss as stipulated in the Global Assessment of the Intergovernmental Panel on Biodiversity and Ecosystem Services. While we welcome all targets (9 to 13) on “Meeting people’s needs through sustainable use and benefit-sharing”, we worry that these are not measurable or actionable in their current state. We commend that target 14 to 21 on tools and solutions for implementation and mainstreaming, represent an ambition higher than we have ever seen before for biodiversity.

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 were not made, and many conflicts with affected communities have either arisen, or remain as critical issues from the past. This focus may even have been a ‘red herring’ strategy, enabling failures in more important aspects of conservation to go un-noticed - such as stopping the drivers of nature’s decline, or of inequitable implementation of conservation in some protected areas, and failures to address 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 conventional approach that alienates people from nature. Its four principles include:

1. focus 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),
4. all relevant targets of the GBF are addressed jointly as none can be achieved in isolation.

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

- a) *intact but unprotected areas*, to strengthen focus on local governance and management that secure rights, maintain intactness and guarantee benefits obtained from nature.
- b) *‘shared’ spaces/mixed land/seascapes* with a mosaic of altered and natural (or semi-natural) habitats, to:
 - o identify and secure 20% of the land/seascape most suitable for securing intact habitat that can meet peoples’ needs and conservation objectives;
 - o if needed, restoration actions that assure this area meets integrity criteria for conservation on relevant timelines,
 - o identify and secure benefits to people from both 20% and 80% fractions of the land/seascape,
 - o assure activities in the remaining 80% are not detrimental to health of the whole earth.

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

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

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 glossary¹ is not comprehensive enough to specifically 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, and inclusion of ‘all’, while desirable, may set too high an ambition that cannot be met effectively. ACBA encourages more careful, fully inclusive planning, to assure it is fit for purpose.

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

- **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 representation, effective management and equity. ACBA is of the view that implementing the sub targets on management, connectedness and ecological representation 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, authority and responsibilities of IPLC. 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 IPLC 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.

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

The target wording 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:

¹ CBD/WG2020/3/3/Add.2/Rev.1 26 November 2021.

Alt target 5: The harvesting, trade and use of wild species is legal, sustainable, safe for human health [and equitable] [while considering and respecting rights to customary sustainable use [of Indigenous peoples and local communities]]

- **Target 9: 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.

Given the dominance of commercial agriculture and global trade, ACBA explicitly calls for:

- a) decreasing area dedicated to genetically uniform production (e.g. in agriculture, aquaculture, forestry) and commercial control of seed and production systems.
- b) promote and expand mixed farming landscapes integrated with biodiversity patches, as presented in ACBA’s ‘shared earth’ framework (see box).
- c) re-orient laws, policies, programmes, trade deals, incentives etc (Targets 14, 18) to ensure that small-scale food producers are centered in the solution to Africa’s food insecurity and discussions on natural resources, biodiversity, spatial and development plans.

Alt target 9: 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.

- **Target 11: Increase the area of, access to, and benefits from green and blue spaces, for human health and well-being in urban areas and other densely populated areas.**

This should be quantitative synthesizing guidance (such as that from UNEP of 9-50 m² green space per capita in urban areas), and emerging recommendations for blue spaces. The roles of green and blue infrastructure mixed with grey infrastructure needs to be recognized, and incorporated into this target through implementation mechanisms and the monitoring framework.

- **Target 13: Implement measures at global level and in all countries to facilitate access to genetic resources and to ensure the fair and equitable sharing of benefits arising from the use of genetic resources, and as relevant, of associated traditional knowledge, including through mutually agreed terms and prior and informed consent**

A major gap with respect to ABS is the fact that the actual benefits shared are either completely absent, or are simply unaccounted for and therefore unable to be measured/monitored etc. This is due to trade agreements, which due to issues of confidentiality, there is no data available at all on benefits shared to date. Therefore, this target should specify transparency around benefits shared in all ABS related trade

deals. Inclusion of the term ‘as relevant’ makes it unclear when, or who decides, it is applicable. ACBA strongly recommends deleting the terms “and as relevant”. ACBA also insists that benefit-sharing is not limited to only commercial products and that research outcomes and related knowledge should be covered under benefit-sharing as was intended under the ABS.

*Alt target 13: Implement measures at global level and in all countries to facilitate access to genetic resources and to ensure the fair and equitable sharing of benefits arising from the use of genetic resources, and ~~as relevant~~, of associated traditional knowledge, including through mutually agreed terms and **free, prior and informed consent with transparency around the monetary and non-monetary benefits shared in all ABS related trade deals.***

- **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**

The text “assess and report on their dependencies and impacts on biodiversity” identifies a specific approach related to ‘science-based targets’. This prioritizes a quantitative, accountable and verifiable approach, which ACBA endorses. The target calls for ‘reducing negative impacts by half’ and ‘increasing positive impacts’. While this is equal across all entities, a common but differentiated approach is likely justified, so that the entities with the biggest impacts and largest capital resources achieve larger reductions in impact and larger positive impacts. This may also hold for developed vs. developing economy entities where the former may be larger and have greater safeguards for their financial security. This is not equivalent to a ‘free ticket’ as in early offsetting approaches, but an equitable distribution of responsibility for past impacts, with all taking on strong commitments to minimize future impacts.

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 for promoting sustainable businesses in the informal sectors that are often based on biodiversity.
- c) The need to promote businesses that are led by women, youth and other vulnerable groups.

- **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 puts all responsibility for action to individuals, and away from the companies and producers delivering consumer goods, and the market-based economies that reward unsustainable business practices. In many economies, and for sectors of the population, there may be few choices available for individuals to make choices and/or their agency or disposable income may not allow any choice. 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.

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 changing the subsidies that damage natural systems on the continent (and globally), while also needing to protect, nurture and grow domestic businesses and economies. 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.

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.

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.

This target on financial resources is critical, but is too long and complex to make specific wording suggestions. ACBA advocates it be simplified to make it stronger, and the multiple dimensions be incorporated in the resource mobilization, implementation and monitoring mechanisms. This will also make implementation of the target more responsive to rapidly changing and novel opportunities in resource mobilization.

Large scale and multi-lateral funding processes are complex, requiring intermediaries that mean funds do not always reach the grassroots, where it is needed. Current financial mechanisms are 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 milestones and goals of the GBF.

ACBA notes that US\$ 700+ billion US dollars is needed per year, so the targeted US\$ 200 billion is not ambitious enough, nor the annual increase by at least US\$ 10 billion per year. 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.

As part of this, novel financing and implementation solutions will be needed, that address multiple issues, such as the potential for nature-based & market-based solutions to address all three aspects. 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.

It is critical that funding gets to where biodiversity conservation is yielding positive outcomes to people and nature. Also, the manner in which the funds can be accessed should not only favour the sophisticated and large NGOs but should promote the agency of IPLCs and national actors and organizations, including women and youth, to match the long-term nature of biodiversity conservation and investment in societal resilience.