

**The Nature Conservancy**  
**Views on the First Draft of the Global Biodiversity Framework (GBF)**  
February 2022

The Nature Conservancy (TNC) welcomed the [First Draft of the Global Biodiversity Framework \(GBF\)](#) released on 12 July 2021 and provided an initial set of comments at that time. This paper updates our recommendations considering the virtual sessions of SBSTTA24, SBI3 and OEWG3 and bilateral discussions with parties and other stakeholders in the interim.

**Key Issues:**

- The GBF mission statement should include a goal of **nature positive** by 2030, meaning **halting and reversing nature loss** measured from a baseline of 2020, through increasing the health, abundance, and resilience of species, populations and ecosystems and sustaining the diversity of species and ecosystems so that **by 2030** nature is visibly and measurably on the path of recovery.
- The First Draft is not transformational in terms of addressing the main **drivers** of biodiversity loss; the action targets need to explicitly **address risks from infrastructure, agriculture and other production sectors** that are driving conversion, degradation and loss. Target 1 (spatial planning) should explicitly address driver sectors as being subject to these plans.
- Target 14 on mainstreaming and aligning financial flows needs to spell out much more concrete and specific action targets and means of implementation to transform key sectors that are driving biodiversity loss, especially agriculture, infrastructure and finance.
- The proposed approach to global target setting, conservation planning and tracking area-based conservation focuses on “land and sea areas,” and is insufficient for securing and improving freshwater biodiversity and ecosystem function. To meet the 2030 and 2050 Goals, we strongly recommend revisions to the targets and indicators to explicitly include **freshwater ecosystems, biodiversity and their unique needs**.
- **Resource mobilization components** should be more clearly stated, with text clarifying the role of subsidy reform and domestic and international resources in meeting the milestone in Goal D. **National Biodiversity Finance Plans** should be a requirement for all countries and included in Target 19; this mechanism is critical to attainment of the Resource Mobilization targets in the GBF and must be initiated as soon as possible.
- **Implementation mechanisms** are not included in the First Draft; the cover note suggests that they would be part of a separate COP decision. Given the importance of implementation mechanisms to the success of the framework, Parties must be able to agree on implementation in tandem with the GBF.

- The **monitoring framework** is still incomplete, and the Headline Indicators draft ([WG2020-03-03.add1](#)) has significant gaps, notably on freshwater/riverine ecosystem components.

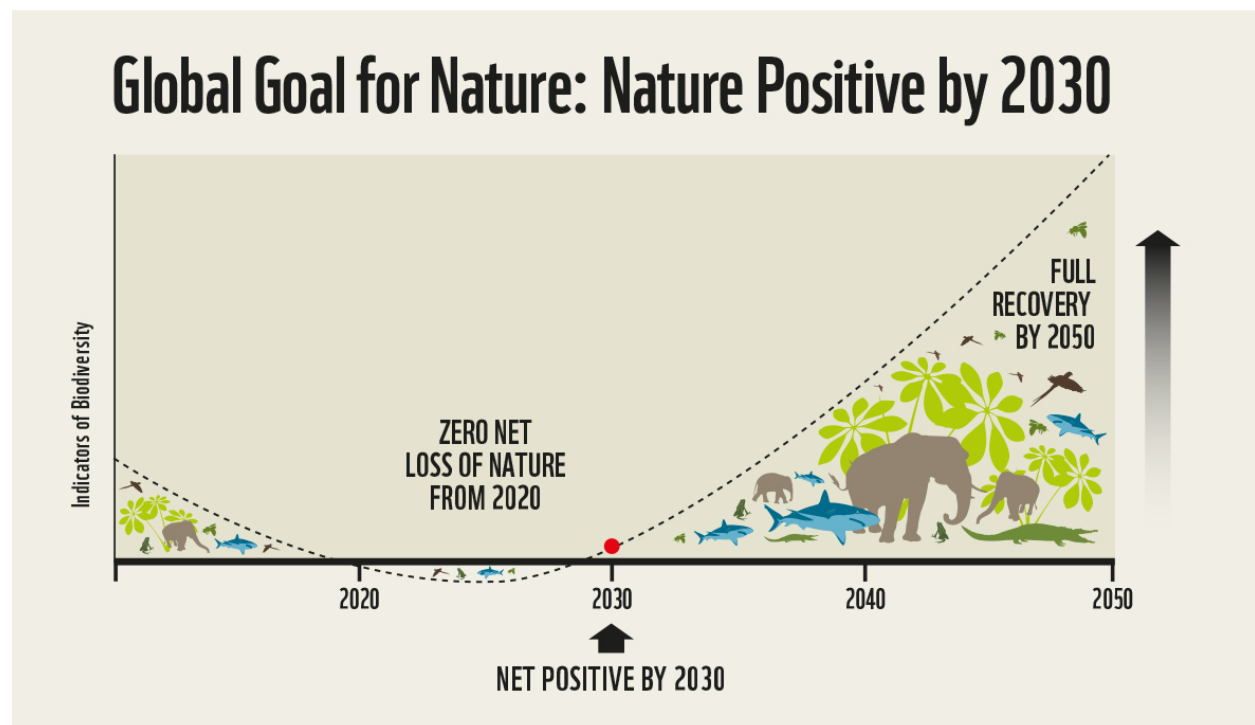
## Section by Section Recommendations

### Mission

The GBF should have as its mission to halt and reverse nature loss so that we are **nature positive by 2030**. This mission was illustrated by a figure that was included in the SBSTTA-24 document on scientific and technical information (SBSTTA-24-03-add2. Rev1) and is reproduced in a modified fashion below.

#### Proposed text:

*To achieve a nature positive world by 2030 by halting and reversing nature loss, for the benefit of the planet and people.*



### GOAL A:

The Goal's proposed "15 per cent increase in the area and integrity of natural ecosystems by 2050" is likely insufficient to achieve the 2050 Vision of living in harmony with nature. We recommend a goal of at least 25 per cent.

The baseline for Milestone A.1, “Net gain in the area, connectivity and integrity of natural systems” should be correspondingly increased to 10 per cent (by 2030), and a baseline year of 2020 should be established in the text of the milestone.

#### GOAL B:

While the goal and milestones are appropriate, they will be difficult to measure and aggregate at different scales. The UN System of Environmental Economic Accounting proposed in the Headline Indicators document (WG2020-03-03-add1) will need to be supplemented by other indicators and methodologies to assess progress toward these milestones.

#### Proposed text:

*Nature’s contributions to people are valued, **considered on national accounts**, maintained or enhanced through conservation and sustainable use, **by adjusting national policies through mainstreaming biodiversity** and supporting the global development agenda for the benefit of all.*

#### GOAL C:

The restriction of benefit sharing to genetic resources (and associated TK) has not ensured benefits envisaged under the Nagoya Protocol. Goal C should therefore include "associated traditional knowledge" and "derivatives" to ensure ABS is not fundamentally undermined.

#### Proposed text:

*The benefits from the utilization of genetic resources, **derivatives and associated traditional knowledge**, are shared fairly and equitably, with a substantial increase in both monetary and non-monetary benefits shared, including for the conservation and sustainable use of biodiversity.*

Further, the milestones C.1 and C.2 should be revised to reflect two key concerns by IP & LCs:

- Some holders of TK have not come by TK legitimately, e.g., there are some repositories that have not applied FPIC, so the language in both milestones should be oriented specifically toward **IPs and LC’s holding such traditional knowledge**.
- The participation of [TK] providers including IPs & LCs should be a given whenever their knowledge is being accessed. The most important non-monetary benefit is in fact not merely their participation, but the *protection, preservation and maintenance of traditional knowledge* in accordance with Article 8(j) of the Convention. This should be through mutually agreed terms and guided by community protocols, based on language in the Nagoya Protocol.

#### Proposal for Milestone C.1

*The share of monetary benefits received by providers, including **indigenous peoples and local communities holding traditional knowledge** has increased.*

### Proposal for Milestone C.2

*Non-monetary benefits— such as research, development, preservation and maintenance of traditional knowledge—have increased through the participation of indigenous peoples and local communities holding such knowledge, and based on mutually agreed terms and bio-cultural community protocols.*

### **GOAL D:**

TNC appreciates that this goal is consistent with the findings and recommendations of our *Financing Nature* report. We welcome framing the goal in terms of closing the \$700 billion annual gap by 2030, thus **requiring actions to both raise new funding as well as reduce or repurpose harmful spending** in multiple sectors, esp. agriculture.

The current milestone D.1 sets a quantitative milestone of closing the \$700B finance gap by 2030. Framing the target for “financing green” in terms of closing the gap by both reducing harmful expenditures and increasing positive flows from all sources is essential.

The Co-Chairs’ Reflections paper raises the question of whether the Milestones should remain in the text. We recommend that they remain. However, if the Milestones are removed, then this milestone would need to be reformulated as an umbrella target covering what is now Target 18 on harmful subsidies and Target 19 on new resource mobilization.

The issue of alignment of public and private flows needs to be elevated to the level of the goal or milestone. It is essential that the GBF contain a target or goal on “greening finance” akin to Article 2.1.c of the Paris Agreement. A new milestone could address this:

### Proposal for Milestone D.1bis:

*All public and private financial flows are aligned with the goals of the global biodiversity framework by 2030.*

### **Target 1:**

This retains a focus on spatial planning rather than the purpose of the spatial planning; it obfuscates its intent and emphasizes the process, not the outcomes. Spatial planning must be aimed at retaining irreplaceable biodiversity areas, including intact, high-quality habitats and those places which support the persistence of life on earth. Preventing **degradation and conversion of these areas and avoiding and mitigating negative impacts** from industries and other drivers of change should be an objective of integrated spatial plans. Only then can Target 1 contribute to Goal A/Milestone A.1.

We also strongly recommend revisions to the target to **explicitly include freshwater ecosystems** and their unique needs. The standing assumption that terrestrial planning and protected areas will meet the needs of freshwater biodiversity and ecosystems has been refuted at the global, regional and local scales.<sup>1</sup> For example, in places where terrestrial

protected areas do currently provide some benefit to freshwater biodiversity, this protection often lacks durability, as evidenced by the globally widespread development of dams inside protected areas.

**Proposed text:**

*Ensure that all land, freshwater and sea areas globally are subject to inclusive, biodiversity-driven spatial plans and integrated management ensuring retention of existing highly-intact natural areas and the lands and territories of IPLCs, and ensuring the persistence of biodiversity **through minimizing the impact from infrastructure and other sectors** responsible for land-freshwater-and sea-use change and degradation.*

### Target 2: Restoration

TNC strongly supports the addition of a separate target on **restoration. We believe it will be necessary to have begun restoring at least 25 per cent (as opposed to 20 per cent) of degraded** ecosystems by 2030 to make sufficient progress toward the milestone.

**Proposed text:**

*Ensure that at least **25 per cent** of degraded freshwater, marine and terrestrial ecosystems are under restoration, ensuring connectivity among them and focusing on priority ecosystems.*

### Target 3: Area-Based Conservation Measures

TNC strongly supports the component elements added to the area-based measures target in the First Draft. Specifically, we support “**ecologically representative**” remaining in the target language to complement “areas of importance for biodiversity” as an essential way to ensure all biodiversity persists. We have worked to improve measurement of ecological representation of conserved areas through the Representation Achievement Score (Jantke et al., 2019), which will be calculated for all countries of the world with each update of the EU’s Digital Observatory on Protected Areas (DOPA), helping us better quantitatively assess how area-based measures are improving ecological representation globally.

We also recommend that **freshwater** be explicitly called out in the target (proposed revised text, “30 per cent globally of land, **freshwater**, and sea areas”). Freshwater ecosystems are some of the most threatened and under-protected ecosystems, and further, are often transboundary—which presents unique management challenges. Freshwater systems are not currently being measured in our assessments of protected and effectively managed areas [see also Target 1 discussion above].

Further, given the importance of **indigenous and community-managed areas** to achieving this target, TNC believes the target should include qualifying language that it be pursued *with the free prior and informed consent of indigenous peoples and local communities, and including*

*through appropriate recognition and support for the collective lands, territories and resources of indigenous peoples and local communities.*

#### **Target 4: Species**

TNC supports the target.

#### **Target 5: Wildlife use and trade**

TNC believes the target could be strengthened by including text on the importance of this target in reducing spillover of pathogens from wildlife to people.

#### **Target 6: Invasive Alien Species**

TNC supports the target.

#### **Target 7: Pollution**

TNC supports the strong targets on nutrients, pesticides and elimination of plastic waste. However, we note that volume-based targets for pesticide reduction do not account for the wide variation in toxicity and impacts of different kinds of pesticides and could therefore have perverse effects. It would be preferable to express targets (and indicators) in terms of impacts on environmental and human health<sup>1</sup>. If it is not possible to develop such indicators in the short term, a volume reduction target/indicator per area of farmland might be more suitable than a focus on gross reduction of pesticides by volume. We also note that current levels of pesticide and fertilizer use vary widely; for countries with very low use rates, safe and appropriate increases may be necessary to close yield gaps.

In general, regarding agricultural pollutants, the GBF should emphasize incentives for land and product stewardship measures to improve the responsible use of nutrients and pesticides through implementation of regenerative agriculture techniques in Target 10.

#### **Target 8: Climate**

The target now includes a clear objective of contributing at least **10 Gt CO<sub>2</sub> per year** to global climate mitigation, which is supported by TNC research.<sup>ii</sup> It now focuses on **avoiding** negative impacts on biodiversity (from “minimizing” in the Zero Draft).

The use of the term “nature-based solutions” (NBS) has been removed from the text in favor of “ecosystem-based approaches,” which has long-standing use under the Convention. TNC acknowledges the contributions ecosystem-based approaches have for nature and people; however, **we support the reintegration of the NBS concept as a broader umbrella term that**

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<sup>1</sup> For example, the Environmental Impact [of Pesticides] Quotient (EIQ). See: Kovach, J., Petzoldt, C., Degni, J., and Tette, J. 1992. A method to measure the environmental impact of pesticides. *New York’s Food and Life Sciences Bulletin* 139:1–8.

**fully covers all possible nature-based solutions** and has been defined by IUCN in a way that includes appropriate biodiversity safeguards. Including the NBS concept throughout the GBF will improve the integration of a broader range of solutions and co- benefits across the multilateral environmental conventions, especially the UNFCCC. To avoid confusion of the different terms we recommend the CBD clarify the different concepts and provide examples of its application in a decision linked to the GBF.

**Proposed text:**

*Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through Nature-based Solutions (NbS), 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.*

**Target 9: Sustainable management of wild species**

TNC appreciates the focus in this target on protecting **customary sustainable use by indigenous peoples and local communities**.

**Target 10: Sustainable natural resource management**

This target on agriculture, aquaculture and forestry is improved by its focus on **increasing the productivity and resilience of production systems** and doing so through biodiversity conservation. TNC recommends inclusion of the concept of **regenerative agriculture** in this target, as well as consideration of inclusion of the **foodscapes** concept as an integrative framework to bring together stake holders and best practices around defined food production landscapes and seascapes.

**Proposed text:**

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

**Target 11: NCP – Air, water, DRR**

This target has been made more comprehensive by recognition that nature’s contributions to people are global in scope, but in removing a specific target figure (that implies specific populations have benefitted from improved nature services), the target now has new challenges for accountability and measurement. We suggest the reintegration of the NbS reference.

**Proposed text:**

*Maintain and enhance **Nature-based Solutions** to regulate air quality, quality and quantity of water, and protection from hazards and extreme events for all people.*



### Target 12: Urban parks/health

TNC recommends reinstating a measurable number in this target. (The 0.5 draft suggested a 100 per cent increase in green and blue spaces in urban areas.) We propose the following:

#### Proposed text:

*Ensure that all urban dwellers are within a 15-minute walk (1.5km) of an accessible green or blue space by 2030.*

This improves the equity and human benefits of the target more than a simple increase in area.

### Target 13: Access and Benefit Sharing

TNC supports the target and recommends changing PIC to FPIC.

#### Proposed text:

*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**.*

### Target 14: Mainstreaming and aligning financial flows

This is a critical target for success of the mission. If truly implemented, it could provide the necessary transformational push for the GBF. However, it encompasses so much that there is little accountability for any specific sector-based action or policy. We recommend the inclusion of **a short set of action-oriented sub-targets that specify regulatory approaches** that are necessary to integrate biodiversity at all levels of the economy, especially in the sectors of agriculture, infrastructure, and finance.

From a resource mobilization perspective, it is essential to highlight the connection between mainstreaming and resource mobilization, as the largest opportunities to close the biodiversity finance gap will come from redirecting and aligning existing and planned financial flows in key sectors such as agriculture and infrastructure. This could be made more explicit by referencing the mitigation hierarchy in Target 14. There needs to be a corresponding reference to the need to align financial flows in the goal and milestones section.

#### Proposed text:

*Fully integrate biodiversity and its multiples values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy, ensuring that all activities and financial flows follow the **mitigation hierarchy and are aligned with shared goals** for biodiversity*



### Target 15: Business dependencies and impacts

This target should be reformulated to address the responsibilities of Parties to set the regulatory requirements to shift corporate behavior and require disclosure, rather than be addressed directly to the private sector. The proposed amendments could read:

#### Proposed text:

***Ensure that all relevant businesses (public and private, large, medium and small) fully integrate biodiversity into decision-making, and regularly assess and disclose 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.***

In addition to the modifications above, the work of the TNFD and the SBTN could be referenced in the Resource Mobilization Strategy as providing supporting processes and methodologies.

### Target 16: Overconsumption & waste

TNC supports a concise target. We suggest shifting language related to decision-making, access to information and cultural preferences to the sections.

#### Proposed text:

*Reduce by at least half the waste and, where relevant the overconsumption, of food and other materials.*

### Target 17: Biotechnology

TNC does not currently have a position on this target.

### Target 18: Harmful subsidies

The target captures the fact that a significant part of the biodiversity finance gap can be closed by removing or repurposing harmful spending, thus reducing the need for biodiversity funding. The current draft uses the \$500B figure from the 2020 [Financing Nature](#) report and echoed by the 2021 [UNDP/UNEP/FAO report](#) for subsidies in the agriculture, forestry and fisheries sectors that are harmful to biodiversity. By OECD methodology, about half of these fall into the category of “most harmful.”

We support the existing formulation of redirecting or repurposing \$500B in subsidies harmful to biodiversity and add an interim target to require all countries to undertake assessments of their harmful subsidies by 2024 as a stepping-stone towards their repurposing or elimination by 2030. OECD is working on methodologies and BIOFIN is now piloting one in 27 developing countries. The methodologies could be referenced, as examples, in the Resource Mobilization

Strategy, along with capacity building and financial assistance, where needed to develop those assessments and ultimately implement them.

**Proposed text:**

*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 BY 2030, **and undertake national assessments to identify and quantify all subsidies harmful to biodiversity by 2024.***

**Target 19: Financial resources**

This target needs to be broken down into several components in order to set targets and expectations for all sources of finance. **National biodiversity finance plans** should be required, with an interim target for developing them by 2024. These set the context for national policies and targets around domestic resources mobilization, private sector financial flows, and use of international funding.

The methodologies for developing NBFs or their equivalent can be referenced in the Resource Mobilization Strategy if it is ready for approval by COP15, otherwise it should be included in the core GBF text to ensure immediate progress. ODA funds can be made available to support their development (as is currently envisioned within the GEF 8 replenishment document). Bilateral and multilateral agencies have a critical role in supporting capacity building and financial assistance for both the development and implementation of national biodiversity finance plans. Parties that have developed robust NBFs or their equivalent should receive priority for implementation support through international financial flows.

The language should clarify the \$200 billion in resource must be new and additional (see [Figure 2.](#)). It should read “**by** \$200 billion,” not “**to** \$200 billion.”

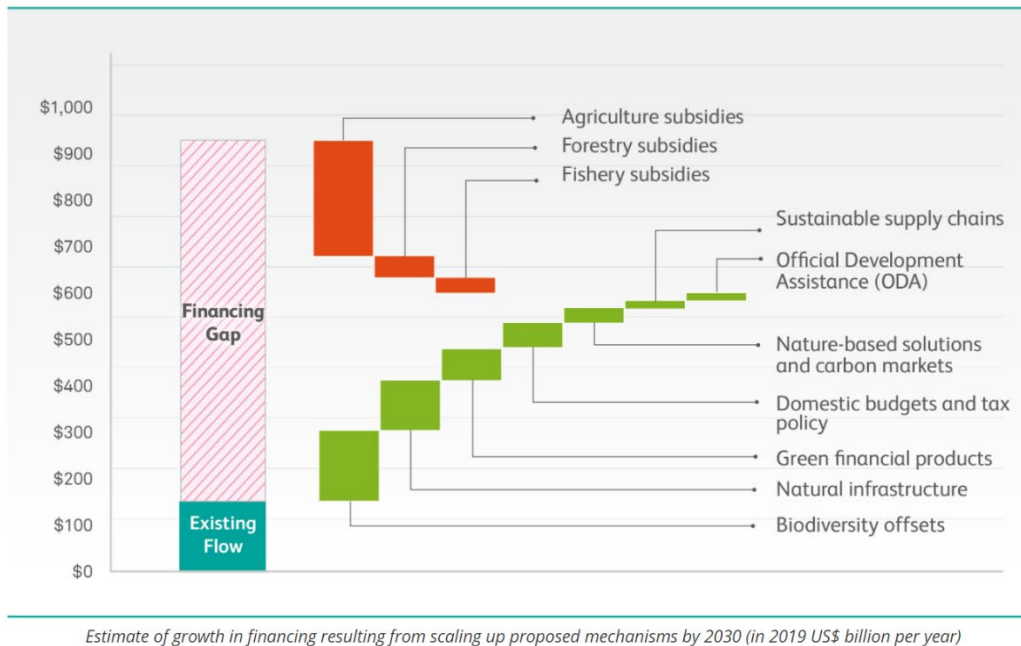


Figure 2. from Deutz et al. 2020.

### Proposed text:

*Increase financial resources from all sources by at least us\$200b, including new and additional financial resources by:*

- *increasing international biodiversity finance to developing countries by at least us\$60 billion per year;*
- *developing national biodiversity finance plans or similar instruments by 2024, identifying mechanisms to increase domestic resource mobilization, incentivize private sector flows, leverage international flows and reduce or redirect harmful flows in order to close national biodiversity finance gaps;*
- *increasing the effective and efficient **and equitable** use of current and additional financial resources,*
- *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.*

### **Target 20: Knowledge, awareness, education**

TNC supports the improvements to this target, particularly the strengthening of the language of indigenous peoples and local communities related to Traditional Knowledge and the importance of FPIC.

### Target 21: Equitable participation

TNC supports the improvements to this target, particularly the strengthening of the language of indigenous peoples and local communities. We suggest making deliberate reference to freshwaters: “...*respect their rights over lands, **waters**, territories and resources...*”.

### Section H: Implementation Mechanisms

TNC appreciates the importance of keeping the core text of the GBF as concise as possible to support its understanding and use by a wide range of institutions and stakeholders. However, implementation mechanisms are crucial to transparency and accountability – and ultimately to the success of the GBF. The GBF must be tightly linked to the implementation components, and they must be adopted in tandem.

**NBSAPs** should remain as the primary implementation mechanism for defining parties’ domestic obligations to the CBD; they may need to be updated to reflect the new targets in the GBF. NBSAPs should also be coordinated with **National Biodiversity Finance Plans**, which we believe should be an obligatory implementation mechanism (see Target 19 discussion above.) **National Reports** should continue to be the primary mechanism for evaluating progress; they should be prepared according to the Headline Indicators adopted at COP15 to allow for consistent assessment and monitoring progress toward the global targets. The National Reports should be subject to a peer-review process. The Secretariat, with WCMC or other relevant bodies, should conduct a mid-term “stocktake” to evaluate progress toward the 2030 milestones and identify shortcomings for special attention or additional investment.

Resource mobilization mechanisms should also ensure that adequate, accessible, and appropriate **finance and capacity is available for IPLCs to fully engage in implementation of all aspects of the GBF**, including for territorial planning, conservation management of species and ecosystems, participation in national policy processes and resources to support restoration and nature-based climate solutions on IPLC lands.

### Section K: Outreach, awareness and uptake

We recommend a revision to this paragraph as proposed below to strengthen the link between biodiversity and human well-being as the objective of awareness and outreach:

#### Proposed text:

*Outreach, awareness and uptake **and monitoring** of the post-2020 global biodiversity framework by all stakeholders is essential to effective implementation, including by:*  
*(a) Increasing understanding, awareness and appreciation of the **essential function** of biodiversity **to functioning societies**, including the associated knowledge, values and approaches used by indigenous peoples and local communities.*

## **Contact:**

Linda Krueger [lkrueger@tnc.org](mailto:lkrueger@tnc.org)

Anna Willingshofer [a.willingshofer@tnc.org](mailto:a.willingshofer@tnc.org)

Jantke, K., Kuempel, C. D., McGowan, J., Chauvenet, A. L. M., & Possingham, H. P. (2019). Metrics for evaluating representation target achievement in protected area networks. *Diversity and Distributions*, 25(2), 170–175. <https://doi.org/10.1111/ddi.12853>

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<sup>i</sup> Darwall *et al.* Implications of bias in conservation research and investment for freshwater species. *Conservation Letters*, 4(6), 474–482 (2011) ; Juffe-Bignoli *et al.* Achieving Aichi Biodiversity TARGET 11 to improve protected areas performance and conserve freshwater biodiversity. *Aquat. Conserv. Mar. Freshw. Ecosyst.* 26, 133–151 (2016), Azavedo-Santos *et al.* Protected areas: A focus on Brazilian freshwater biodiversity. *Divers. Distrib.* 25, 442–448 (2018), Acremen *et al.* Protected areas and freshwater biodiversity: A novel systematic review distills eight lessons for effective conservation. *Conserv. Lett.* 13, e12684 (2019), Leal *et al.* Protected areas: Integrating terrestrial-freshwater planning doubles conservation of tropical species. *Science* 370, 117–121. (2020) ; Higgins, Jonathan, *et al.* "Durable freshwater protection: A framework for establishing and maintaining long-term protection for freshwater ecosystems and the values they sustain." *Sustainability* 13.4 (2021): 1950., Opperman, Jeffrey J., *et al.* "Safeguarding Free-Flowing Rivers: The Global Extent of Free-Flowing Rivers in Protected Areas." *Sustainability* 13.5 (2021): 2805.

<sup>ii</sup> Griscom, B. W. *et al.* Natural climate solutions. *Proceedings of the National Academy of Sciences* 114, 11645–11650 (2017).