



**AUSTRALIAN  
CONSERVATION  
FOUNDATION**



# Australian ENGO Position on the Post-2020 Global Biodiversity Framework

## Introduction

As leading conservation organisations collectively supported by millions of Australians, we welcome the opportunity to contribute to the Australian Government's position on the Post-2020 Global Biodiversity Framework (GBF) ahead of the fourth meeting of Open Ended Working Group taking place from 21 to 26 June 2022 in Nairobi, where it will finalise a draft global biodiversity framework for adoption by the Conference of Parties at the second part of its 15<sup>th</sup> meeting.

The 15<sup>th</sup> meeting of the Conference of the Parties to the United Nations Convention on Biological Diversity (CBD) is an important opportunity to galvanise international and domestic commitments to do what nature needs in the next decade. Few parties to the CBD have as much at stake as Australia - the only developed and megadiverse party to the Convention.

The text on the mission, goals, and targets of the framework developed at the 3<sup>rd</sup> meeting of Open Ended Working Group in Geneva in March 2022 remain far from the level of ambition that will be required to achieve the transformative change Australia and the world needs.

For the GBF to align with the vision of the CBD and support implementation of a pathway to a world living in harmony with nature, its central mission needs to be a clear and urgent commitment to halt and reverse biodiversity loss and to be **nature-positive** by the end of this decade. For the mission to be achieved, the goals and targets must be more specific, measurable, and aligned with what science tells us is needed to ensure a nature-positive world.

Ensuring that the GBF we need is adopted and implemented will also require parties to show leadership through their respective commitments in support of the mission. Australia has a responsibility to deliver the ambition expected at home to protect and restore what we love, and an opportunity to show leadership for the global ambition we need. It can lead by fulfilling the commitments of the High Ambition Coalition for Nature and People, Global Oceans Alliance, and Leaders Pledge for Nature<sup>1</sup>, and translate these into a far more ambitious GBF. The first step is to strengthen the First Draft in the following priority areas.

## Areas for Australian Government leadership in Nairobi

To demonstrate genuine international leadership, Australia should take an active role in upcoming negotiations to ensure the highest level of ambition is achieved. In particular:

- Australia should strongly support a clear and unambiguous mission to halt and reverse biodiversity loss and to put biodiversity on a path to full recovery. Australia should support goals which include a

<sup>1</sup> The High Ambition Coalition for Nature and People is endorsed by 77 CBD parties including Australia; the Global Oceans Alliance is endorsed by 70 CBD parties including Australia; and the Leaders Pledge for Nature endorsed by 94 CBD parties.

clear commitment to halt human induced extinction and reduce extinction risks by 2030, and work to ensure that other countries support this critical milestone.

- For Target 2, Australia should propose a target of at least 50% of degraded ecosystems and their connectivity restored or under effective restoration, and make sure that it is clear that terrestrial, inland waters (including rivers), marine and coastal ecosystems are included.
- Australia should withdraw its opposition to the inclusion of a mandatory requirement for business and financial institutions to disclose impacts and dependencies on nature and act to reduce negative impacts in target 15.
- Australia should aim to ensure there are quantifiable and accountable goals and targets in the GBF and should abandon previous positions aimed at removing specific numerical or otherwise quantifiable goal and target wording throughout the GBF.

## Priority proposals to improve the First Draft of the Post-2020 GBF

### 2030 Mission

The current 2030 mission is neither clear nor ambitious enough to deliver the 2050 vision of restoring and living in harmony with nature. The GBF must provide direction and urgency at the highest political level by setting a measurable, science-based goal for cooperative action by governments, business, and civil society. Science tells us that by 2030 we must have halted and reversed nature loss to be net-positive, measured from a baseline of 2020. The long-term certainty of a clear and measurable mission aligned with scientific advice is vital to ensure government policy, financial investments, and business decisions are aligned with a nature-positive world.

- Australia should propose improved wording in the 2030 mission statement so that it includes an unambiguous commitment to **halt and reverse biodiversity loss to achieve a nature-positive world by 2030 and put biodiversity on a path to full recovery.**

### Species, ecosystems, and protected areas (Goal A and targets 2, 3 and 4)

At the Geneva meeting concerns about the need to simplify the Framework saw a Friends of the Chair group develop options for integrating the Milestones into other parts of the Framework, however no conclusion was reached on this issue. This will need to be resolved at Nairobi.

It is critical that the 2050 goals include specific and measurable milestones or outcomes for 2030, as these clarify what must be achieved this decade. These milestones or outcomes are fundamental to tracking progress toward the 2050 vision and to avoiding slippage in the action required to meet the 2050 goals.

- **Goal A** should be refined to align with the Leaders Pledge for Nature commitment to **clear and robust goals and targets** (2.a) and to **halt human induced extinction of species, and to ensure species populations recover** (2.b).
- Measurable milestones or outcomes for 2030 and 2050 should be integrated into Goal A. It is critical that ambitious 2030 components on extinction, extinction risk, and abundance are maintained at the Goal level as proposed in the composite text, and 2050 components are added to illustrate the level of ambition needed to halt and reverse biodiversity loss by 2050.
- **For Goal A:**
  - This goal should include an unambiguous commitment to immediately **halt human induced extinction and to reduce extinction risk by 20% by 2030**, rather than the less ambitious commitment to halt or reverse the increase in the rate of extinction.
  - “Rate of extinctions” is difficult to measure and approaches to doing so vary. It is not appropriate as a GBF goal. In addition, “the rate of extinctions has been reduced at least

tenfold” should be replaced with a clear and unambiguous commitment to **prevent extinctions**. Aichi Target 12 committed parties to “prevent the extinction of known threatened species by 2020” - anything less than a commitment to immediately halt human induced extinctions will be an unacceptable step backwards from this ambition.

- Extinction risk should be **reduced by at least 20%** in comparison to 2020 levels. Alternative proposals (such as reduction in risk for 20% of threatened taxa), are not equivalent and lack the necessary ambition to align Goal A with the 2050 Vision.
  - The goal should include a commitment to increase the population abundance of species by at least 20% by 2030 and to maintain or enhance population abundance to healthy and resilient levels by 2050.
  - The Australian proposal at OEWG-3 part 1 to insert a reference to ‘due to direct human activity’ is not supported as we are concerned that this ambiguous wording would exclude a broad range of threats which may not be directly attributable to human activities, but to which humans have contributed.
- The level of ambition for ecosystem restoration in **Target 2** should be increased to **at least 50% degraded ecosystems under restoration** to ensure that we will halt and reverse biodiversity loss and achieve the proposed goal and 2030 Mission.
    - Twenty percent degraded ecosystems under restoration is not adequate to ensure we will halt and reverse biodiversity loss and achieve the proposed goals and 2030 Mission. In addition, it would be very far from the level of ambition of SDG 15.1 that underlines the need, by 2020, to “ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems”.
    - To effectively address biodiversity loss and climate change and considering the lack of consensus and harmonised data in defining ‘degraded ecosystems’, this commitment should be based on a proportion of the overall global land and sea area and implemented with a view to restore natural habitats and connectivity in conjunction with targets 1 and 3.
  - The 30 x 30 commitment in **Target 3** is supported with the following refinements:
    - This target should explicitly **include freshwater and inland water ecosystems**.
    - Given their significant role in the conservation of biodiversity, it is paramount that in the process of protecting and conserving 30% of areas, that **IPLC rights to land territories and resources** are at the same time **recognised and secured**.
    - Focus on the effective conservation and restoration of the values of all **Key Biodiversity Areas** and other sites of particular importance for biodiversity and require them to be representative and resourced and managed effectively. Include prioritisation of important areas for biodiversity such as KBAs or High Conservation Value areas.
    - Make the target specific to bioregions or other units representing landscape diversity not arbitrary national boundaries.
    - Incorporate connectivity and consider landscape and migration patterns in building protected area networks.
    - In support of the adoption of this target in disaggregated form, Australia should improve its domestic position to include at least a 30% terrestrial protected area commitment in line with the principle of common but differentiated responsibility.
  - **Target 4** should focus on preventing extinctions, reducing extinction risk, maintaining abundance of non-threatened species and the sustained recovery of wild species.

It is important that Target 4 focus on the urgent actions needed to conserve wild species, and proposals to include domesticated or cultivated species should be resisted.

It should also include a measurable target for the recovery of threatened species and require the implementation of effective and intensive recovery actions for species whose survival depends on such actions or whose recovery cannot otherwise be enabled or sustained.

### Invasive Alien Species (Target 6)

- **Target 6** should be more ambitious in relation to the reduction in rates of introduction and establishment of invasive alien species (IAS). We are of the view that this target should state ***preventing or reducing their rate of introduction and establishment by at least 80%***. We do not support moves to remove quantifiable elements of this target.

Any target for IAS must include the following key elements:

- managing pathways for invasion
- preventing the introductions and establishment of priority IAS
- reducing the of impact of IAS on priority sites (such as important areas for biodiversity and high risk areas for invasion), and
- reducing the impacts of established priority (ie. highly damaging) IAS.

Whilst stronger ambition is needed in the target, there is also a significant amount of work needed to improve indicators for this target at the global and national levels. Increased data collection and significant improvements in transparency will be needed to effectively monitor rates of incursions and establishment, but this need should not be used as an excuse for removing quantifiable components of the target.

### Integration of climate and nature (Target 8)

- Efforts to minimise the impact of climate change on biodiversity listed in **Target 8** should include both nature-based solutions (NbS) and ecosystem-based approaches.
  - We welcome the inclusion of a stronger target that focuses on minimising the impact of climate change on biodiversity through mitigation and adaptation. It is disappointing that the quantified contribution of NbS/ecosystem-based approaches to mitigation (i.e. at least 10 GtCO<sub>2</sub>e/year to global mitigation efforts) has been removed in the report of OEWG-3 Part 2 (CBD/WG2020/3/7). We believe Australia should support the inclusion of this quantified contribution as it will help support more effective integration between the objectives of the CBD and UNFCCC, which is necessary for the success of both as demonstrated by joint work by IPBES and the IPCC.
  - The GBF should include nature-based solutions, which encompass ecosystem-based approaches, while ensuring alignment with a rights-based approach and global standards for NbS, prioritising action as follows: 1. protect, 2. manage 3. Restore, so that they do not cause harm to biodiversity or people.

### Resource Mobilisation and Mainstreaming (Goal D and targets 14, 15, 18 and 19.1)

To achieve the transformative vision of the CBD requires that biodiversity be mainstreamed via a whole-of-government approach, and in cooperation with the private sector and civil society. This requires that nature and nature's contributions to people are comprehensively and transparently measured and monitored as a starting point. Australia can lead by example by quickly implementing the agreed UN statistical framework for natural capital accounting - the System of Environmental - Economic Accounting (SEEA-EA) and harmonising national environmental accounts, for example through the ABS. This will facilitate embedding nature into decision-making within the private sector and government.

But transformation requires more than measurement, it is therefore vital that the GBF's goals and targets are translated into budgets as well as national laws and regulations that are enforced to ensure that they

deliver the intended outcomes for biodiversity, and to level the global playing field for business and investors. Public and private funding for nature restoration and protection needs to increase in line with science-based targets for nature recovery.

- **Goal D** - We do not support the Australian Government's proposed amendment to Goal D to remove numerical values or to delete the words 'is closed.' The closure of the gap between available financial and other means of implementation and what is needed to reverse biodiversity loss should be an outcome of this 2030 goal. The proposed wording would substantially weaken this goal.
- **Target 14** should be strengthened to adequately account for the finance sector's role in contributing to harmful practices and its potential to allocate capital to nature-positive practices. It should specifically refer to **public and private** financial flows. It should also require financial institutions to **measure, assess, disclose, and account for risks, dependencies and impacts associated with biodiversity loss** and **reflect assessed risks and opportunities in their investment decisions**.

We welcome a target on business activity and note the business sector's support for a strengthened target. Reducing negative impacts by half will not be enough to achieve the mission and vision of the GBF – businesses must align all their practices to a nature-positive economy which requires the avoidance of all harmful practices. The target should also reflect the action *parties* must take, not the voluntary contributions of business i.e. parties should adopt regulatory measures and incentives to ensure that all businesses contribute and transform their practices.

- **Target 15** should include wording specifying that parties will **adopt regulatory measures requiring or Ensure through mandatory requirements that businesses and financial institutions** alter their activities in line with the text of the target. It should also **require** business to **avoid all** negative impacts, **disclose** nature-related impacts and dependencies, **ensure public reporting on their dependencies and impacts on biodiversity along their full supply chains and practices** and **implement deforestation and conversion free supply chains**.
- We strongly urge the Australian Government not to support the removal of wording that would compel businesses to act. Voluntary action alone will not be sufficient to achieve the vision of the GBF.
- We oppose the Australian Government's proposal to remove the words 'by half' as a metric for business impact reduction as we believe it is critical to include a measurable target to guide business transformation. Various tools and methodologies needed to measure impact are available or in advanced stages of development, and where gaps exist in data that should be a motivation to improve environmental accounting, not an excuse to avoid setting measurable targets.
- Globally we must identify and commit financial resources from all sources commensurate with full and effective implementation of an ambitious GBF, including an increase in international public finance for biodiversity (primarily grants) to at least \$60 billion per year from developed countries to developing countries, as part of closing the biodiversity finance gap. We must establish and deliver national biodiversity finance plans, and a process to track biodiversity finance commitments (both direct and indirect) (Target 19 and resource mobilisation plan).
- Australia should support measurable goals and targets which would close the financing gap by at least \$US700 billion per year, currently expressed as the removal of \$US500 billion in harmful subsidies in **target 18** and an increase in annual available resources of \$US200 billion in **target 19.1**.

#### Indigenous people and local communities

- **Target 3** should recognize IPLCs lands and waters as a separate and additional category - since IPLC lands and waters are not necessarily included in OECMs. It is important to secure the rights of IPLCs to their lands and waters but not make it conditional to a system of PA and OECMs. This target should ensure that areas governed by IPLCs are appropriately recognized and secured by respecting their Free, Prior and Informed Consent.

- A rights-based approach (RBA) needs to be more consistently integrated across the document, since this is cross-cutting and consists of several elements. Each one of these elements needs to be integrated at the appropriate place at the goals and targets levels to ensure an effective RBA in the implementation of the GBF.
- The GBF should align fully to State obligations under accepted human rights conventions and declarations, including ILO169 and UNDRIP (which uphold Indigenous rights) and integrate the newly recognised right to a clean, healthy, and sustainable environment. A rights-based approach means:
  - respecting, protecting, and fulfilling Indigenous rights, lands, and resources;
  - ensuring free, prior and informed consent (FPIC) and other mechanisms for full and effective participation of Indigenous Peoples;
  - establishing a strong accountability mechanism; and
  - enhancing access to justice and flows of financial and technical resources, with a focus on capacity building and local empowerment (Section B.bis, Targets 20 and 21).

### Perverse and harmful incentives

- More clarity and transparency are needed on estimates of figures for harmful subsidies. The numbers presented for a decrease in harmful subsidies are likely underestimated and do not represent all harmful subsidies. The estimates do not include private financial flows in the finance sector that are harmful to biodiversity and based on data that is still fragmentary.
- Nonetheless all public and private financial flows must be aligned with a nature-positive economy, including through the removal or redirection of all harmful subsidies and incentives.

### Addressing drivers of biodiversity loss

- Include a milestone to halve the footprint of production and consumption by 2030 and targets covering all drivers, including food systems, diets, and infrastructure. These drivers are absent from the current draft and need to be addressed in order to reverse biodiversity loss by 2030.

### Implementation

- To avoid a repetition of the failure to meet the Aichi targets, it is essential that a strong implementation mechanism is fully integrated and adopted together with the GBF. Therefore, the draft text on responsibility and transparency needs to be significantly strengthened, ensuring the inclusion of an effective implementation mechanism that holds countries to account and that allows for a ratcheting of actions over time. We must maximise opportunities drive collective progress towards the global goals by ensuring comparability of national commitments and progress through aligned common formats for NBSAPs and reporting, and ideally annual independent reporting of global progress via a subset of headline indicators (e.g. coverage of KBAs by PAs/OECMs and the Red List Index, SDG indicators already reported annually etc).
- Without this the regular and accurate monitoring and reporting of progress, and therefore accountability and strength of the implementation mechanism, is undermined.

### Joint position endorsed by:

Australian Conservation Foundation  
 BirdLife Australia  
 World Wide Fund for Nature-Australia  
 The Wilderness Society Australia  
 The Invasive Species Council