



Born Free response to the First Draft (Draft 1.0) of the post-2020 global biodiversity framework

• August 2021 •

Five key recommendations for an ambitious, effective and transformative post-2020 global biodiversity framework ('GBF'):

- 1. Reframe the Sustainable Use narrative to prioritise environmental concerns**
- 2. Increase ambition of the species-focussed Goals and Targets to address threats to biodiversity, halt its loss and ensure its recovery**
- 3. Integrate animal health and well-being through the adoption of One Health - One Welfare approaches to reduce zoonotic disease risk and tackle the biodiversity and climate crises**
- 4. Value and embed wildlife and nature protection into all decision-making through mainstreaming**
- 5. Adopt robust implementation mechanisms and ensure adequate resourcing for wildlife and nature protection**

About Born Free

Born Free is a UK-based international charity committed to protecting wildlife and the wild spaces in which they live, inspiring behaviour change, and ending any activities that exploit and negatively impact wild animals around the globe.

Through science-based research, conservation action, policy advocacy and educational outreach, we seek to enhance the survival of threatened species in the wild while respecting the needs and safeguarding the welfare of individual animals, for their own intrinsic value and for the critical roles they play within the biosphere that sustains us all. Since 1984 in over 20 countries, we have campaigned for a future where animals and people can co-exist and where threatened and endangered species are protected for generations to come.

Born Free engages and collaborates with governments, policymakers, intergovernmental bodies, non-governmental organisations and other stakeholders to inform better decision making and action on both species-specific and crosscutting policy issues concerning wildlife conservation, welfare and trade.

We have been actively engaged in the discussions on the development of the post-2020 Global Biodiversity Framework and look forward to the adoption of an ambitious new strategy for nature protection and recovery, supported by robust implementation and review mechanisms. We call upon the CBD and its Parties to fully consider our recommendations.

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Recommendation 1 – Reframe the Sustainable Use narrative to prioritise environmental concerns

The concept of sustainability underpins Draft 1.0 of the post-2020 GBF and is at the core of draft Goal B as well as Targets 5, 9 and 10. The question of how sustainability is defined and measured is therefore critical.

Sustainable use of the components of biological diversity is one of the three objectives of the Convention on Biological Diversity, and is considered essential to achieving the broader Sustainable Development Goals. Decision V/24 frames it as one of the Convention’s crosscutting issues.

Article 2 of the CBD Convention Text defines Sustainable Use as the *“use of components of biological diversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining its potential to meet the needs and aspirations of present and future generations”*.

However, since the inception of the CBD, biodiversity has been declining at record rates. The 2019 IPBES Global Assessment report on Biodiversity and Ecosystem Services reported that human activities, including as land- and sea-use change, direct exploitation of wildlife, and those that result in climate change, are responsible for the rapid decline in global biodiversity and threaten the loss of a million species, many within decades, under business-as-usual scenarios, even where those scenarios include current global conservation efforts. The WWF’s 2020 Living Planet Report revealed an average 68% decline in monitored populations of mammals, birds, amphibians, reptiles and fish between 1970 and 2016.

While the concept of sustainability is composed of three pillars (economic, social and environmental), socio-economic considerations have historically dominated over environmental concerns. The way sustainable use is considered in Draft 1.0 of the post-2020 GBF risks perpetuating this narrative. In the current draft, the concept of sustainability is highly human-centric and does not reflect the intent of Article 2 of the Convention, and the Goals and Targets are framed solely around meeting people’s needs. The GBF must prioritise the elimination of threats to biodiversity and its active conservation and restoration, with a view to halting biodiversity loss and ensuring its long-term recovery; only then can the needs of people be sustainably met.

The summary report of the Thematic Consultation on the Sustainable Use of Biodiversity for the post-2020 GBF¹ noted an emerging consensus on the need for clarity on the concept of sustainable use, as well as for well-defined holistic criteria for assessing sustainability, if the new biodiversity Goals and Targets are to be achieved.

In short, establishment of ‘sustainability’ and the definition of what constitutes ‘sustainable use’ must be based on strict biological and ecological criteria in order to ensure the effective implementation of the post-2020 GBF.

⇒ Options to improve Draft 1.0 in this regard:

Section	Comments and text edit suggestions (in bold)
Glossary (CBD/WG2020/3/3/Add.2)	<p>The question of how sustainability is defined and measured is critical, and the term ‘sustainable use’ should only be applied to uses which meet strict criteria for assessing biological and ecological sustainability, that will allow species and the ecosystems of which they are a part to thrive. A precautionary approach needs to be applied in its definition, given that current rates of wildlife exploitation are a main driver of biodiversity loss.</p> <p>Robust criteria for assessing sustainability must also be established that take into account all uses and pressures on species (including legal and illegal wildlife trade) and incorporate the potential societal and economic risks for human and animal health and well-being from wildlife exploitation.</p>

¹ <https://www.cbd.int/doc/c/5158/15f5/d2df525a1a9867a2b12ee96a/post2020-ws-2020-04-04-en.pdf>

	<p>The current definition of ‘sustainable’ in the Glossary as ‘within the bounds of its capacity for renewal’ is critically unambitious and is limited to considering sustainability in the context of whether exploitation can be continued. A more appropriate definition should be centred on biological and ecological parameters, and should incorporate the need to enable not just renewal, but recovery, at least to a point where species can fulfil their biological niche within healthy and functional ecosystems.</p> <p>The three objectives of CBD – conservation, sustainable use, and equitable benefits – need to be considered as a ‘cascade’ rather than as separate, independent elements. Sustainable use can only be achieved once ecosystem integrity has been re-established. Similarly, successful species and habitat conservation, and biological stability/sustainability, are prerequisites without which sustainable use and equitable sharing of benefits cannot be achieved. It should be made clear that ecological sustainability is a precondition to achieving the social and economic aspects of sustainability.</p> <p>We suggest the following definition of sustainable use, adapted from the proposed definition in the South African Government’s recent draft policy document², should be considered for inclusion in the Glossary and used for interpretation of the new Goals and Targets:</p> <p>Proposed definition:</p> <p>‘Sustainable use’ in relation to the use of wild species means its responsible use in a way, and at a rate that:</p> <ul style="list-style-type: none"> (a) Does not contribute to the long-term decline of wild species of animals and plants; (b) Does not lead to the loss of biological diversity of the ecosystem of which they are components; (c) Does not compromise ecological integrity or ecological resilience of the ecosystem of which they are a part or in which they are used, in the long-term; (d) Is humane and does not compromise the well-being of any animal of a species of wild animal; (e) Serves in, or is not detrimental to, the public interest; (f) Considers the social, economic, and environmental impacts of activities collectively, including disadvantages and benefits; and (g) Ensures continued and future benefits that are fair, equitable, and meet the needs and aspirations of present and future generations of people.
<p>E.2050 Vision and Mission (CBD/WG2020/3/3)</p>	<p>Proposed text amendments for the 2050 Vision and Mission:</p> <p><i>‘A world of living in harmony with nature where: ‘By 2050, biodiversity is valued respected for its own intrinsic value, is effectively conserved and restored and wisely used, and where its utilization is subject to biological and ecological sustainability criteria, with a view to ensuring thriving wildlife populations and improved ecosystem services, sustaining a healthy planet for the benefit of all people life’.</i></p> <p>The principle of Living in Harmony with Nature implies creating a world where people and animals can thrive while living well within the planet’s biological limits. To achieve this vision, the global community needs to build a non-anthropocentric relationship with the natural world which acknowledges the interrelatedness of human and non-</p>

² Based on the draft language in the South African Government’s draft policy position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros
http://www.gpwonline.co.za/Gazettes/Gazettes/44776_28-6_ForFisheriesEnvironment.pdf

<p>Footnote 8, reference in para 10 of section E.2050 Vision and Mission</p> <p>(CBD/WG2020/3/3)</p>	<p>human life. We would like to see this approach embedded in the post-2020 framework, with actions that are not grounded solely in perceived human interests.</p> <p>... <i>“For the benefit of people and planet” highlights elements of nature’s contributions to people, makes a strong link to the delivery of the 2030 Agenda for Sustainable Development and its Sustainable Development Goals while also recognizing the intrinsic and existential importance of biodiversity. In this regard, the definition of sustainable use is extended to mean the use of components of biological diversity in a way and at a rate that is balanced and integrated across the three dimensions of sustainability – economic, social, but primarily focussed on environmental – and does not lead to the decline of biological diversity and encourages its recovery, thereby maintaining and strengthening its potential to meet the needs and aspirations of present and future generations. The 2030 deadline articulates that this mission is a milestone on the way to the 2050 Vision of “living in harmony with nature” and reinforces the need for urgent action this decade.”</i></p> <p>We urge that the agreed principle that for the use of biological diversity to be sustainable, it must be used in a way that is balanced and integrated across the three dimensions of sustainability – economic, social, environment – be included.</p>
<p>Goal B on nature’s contributions to people</p> <p>(CBD/WG2020/3/3)</p>	<p>Goal B focusses on valuing, maintaining and enhancing nature’s contribution to people. It appears to be based on an assumption that such enhancement must not result in further declines, which should be made implicit in the goal.</p> <p>While we recognise that ‘the need to maintain, and where appropriate, enhance nature’s contributions to people’ provides a strong rationale for the conservation and sustainable use of biodiversity, priority should first and foremost be given to the reduction of exploitation and threats to species, and to the active conservation and restoration of biodiversity.</p> <p>The species and ecosystem attributes described in Goal A are critical for ecosystem service provision as they underpin the essential functions that enable the delivery of benefits for people.</p> <p>This goal should explicitly cover all aspects of nature’s contributions to people, including climate change mitigation and adaptation, poverty eradication, human well-being and health, energy generation and water supply.</p>
<p>Target 5 on wildlife harvesting, trade and use of wild species</p> <p>(CBD/WG2020/3/3)</p>	<p>Proposed new text for Target 5:</p> <p>Ensure that the harvesting–exploitation, trade and use of wild species is sustainable, legal, and safe for human health people and wildlife.</p> <p>Our key concerns are how the terms ‘sustainable’, ‘legal’ and ‘safe’ in Target 5 may be interpreted, and the associated indicators that will be used to measure progress. Target 5 should specify that use should be well within ecologically sustainable limits, and safe for human, animal and wider ecosystem health and wellbeing, encompassing One Health-One Welfare principles.</p> <p>In the Glossary – ‘sustainable, legal, and safe for human health’ is defined as follows: <i>‘Implies the harvesting, trade and use of organisms at a rate within th bounds of its capacity for renewal, respects international and national laws and is safe for people and wildlife (e.g., does not contribute to the spread of pathogens or invasive species)’.</i></p> <p>This definition of ‘sustainable’ is critically unambitious, and implies that sustainability is only required to enable continued exploitation. The definition should acknowledge the need for biological and ecological sustainability, which allows for recovery, and safeguards against loss of ecosystem integrity.</p> <p>In addition, under the purview of the CBD any ‘sustainable use’ of wildlife should account for its intrinsic value. Measures should therefore aim to reduce utilisation and</p>

	<p>trade to levels below what would be considered ‘biologically sustainable’ levels, and avoid the exploitation of wildlife to ‘maximum sustainable yield’.</p> <p>Uses should not be considered in isolation; a use can only be considered sustainable when it is considered alongside all other impacts on a population. We advocate a focus on exploring the benefits of responsible non-lethal uses of wildlife, and uses which do not compromise their welfare, as well as a recognition that wildlife that is part of healthy and functional ecosystems already ‘pays its way’ through the ecosystem services provided to people. In this regard, sustainability should include consideration of the impacts of exploitation and other human activities on the social and cultural integrity of animal populations, within the wider ecological context.</p> <p>It should be noted that some forms of exploitation, use and trade may be legal but unsustainable, or may be sustainable and legal but unsafe³. Safe should mean posing zero risk to human and animal health and well-being. Target 5 could be more closely aligned with stated definitions by replacing ‘safe for human health’ with ‘safe for people and wildlife’.</p> <p>We also recommend replacing ‘harvesting’ with ‘exploitation’ in order to articulate all human uses of wildlife.</p>
<p>Indicators for Target 5 (CBD/WG2020/3/3/ADD1)</p>	<p>Headline indicators for Target 5 continue to lack true measures of ecological and biological sustainability. We recommend three headline indicators, one for each of the Target components.</p> <p>An indicator could focus on measuring levels of compliance with other biodiversity-related Conventions and international agreements that deal with threatened species including CMS and CITES, noting that these regulate only a designated number of species.</p> <p>The introduction and enforcement of stronger regulation, through national measures as well as international agreements, as well as implementation of existing measures, could dramatically reduce illegal exploitation of species that are currently threatened or may become so, and that possess particular risks for human or animal health.</p> <p>Clear indicators are needed to measure reductions in the commercial exploitation of wildlife that poses a risk to human or animal health.</p> <p>We note the WHO, FAO, OIE and UNEP guidance on actions that national governments should urgently consider adopting to reduce the public health risks associated with the sale of live wild animals for food in traditional food markets, published in April 2021, which, <i>inter alia</i>, recommends the suspension of trade in live caught wild animals of mammalian species for food or breeding purposes, and the closure of sections of food markets selling live caught wild animals of mammalian species as an emergency measure unless demonstrable effective regulations and adequate risk assessment are in place. The guidance also notes that, while its recommendations focus on the risk of disease emergence in traditional food markets where live animals are sold for food, it is also relevant for other utilizations of wild animals. The guidance recommends that <i>all these uses of wild animals require an approach that is characterized by conservation of biodiversity, animal welfare and national and international regulations regarding threatened and endangered species</i>. Compliance with this guidance should be considered as an indicator in respect to Target 5.</p> <p>An indicator such as that adopted by CMS in its Strategic Plan for Migratory Species, that measures ‘trends in implementation of measures designed to minimise impacts</p>

³ See for instance: Marin, C., Lorenzo-Rebenaque, L., Laso, O., Villora-Gonzalez, J. & Vega, S. Pet Reptiles: A potential source of transmission of multidrug-resistant Salmonella. *Frontiers in Veterinary Science* 7, 613718 (2020).

	<p>of hunting and fisheries on migratory species, their habitats and their migratory routes', should be adopted.</p> <p>On Indicator 5.0.1 ('Proportion of wildlife that is harvested legally and sustainably'), "proportion" is extremely difficult to objectively ascertain, from the perspective of quantifying both legal and illegal offtake.</p> <p>The monitoring framework needs to encourage efforts to prevent and combat illicit wildlife trafficking, targeting both the supply of and demand for illegally sourced wildlife products. Efforts to directly address the illicit trafficking in wildlife are intrinsically linked to, <i>inter alia</i>, consumer behaviour and consumption patterns, policy structures, legislative frameworks and governance issues. There should be indicators on trends in the adoption and effective implementation of policies, laws and regulations, including those associated with international instruments (such as the ICCWC Indicator Framework for Combatting Wildlife and Forest Crime) for all wildlife, not just those species listed under CITES.</p>
<p>Target 9 and Target 10 on sustainable wildlife and ecosystem management (CBD/WG2020/3/3)</p>	<p>These Targets should encourage public and private investment in nature protection, and incorporate criteria for investments which ensure benefits for biodiversity (or no detriment as a minimum). Animal welfare should be identified as a key component through the adoption of a One welfare approach, focussing on essential 'ecosystem services', and reducing non-essential uses. Biological and ecological sustainability is key to the long-term ability to provide equitable benefits.</p>
<p>Indicators for Target 9 and Target 10 (CBD/WG2020/3/3/ADD1)</p>	<p>9.1.1 is not a measure of sustainability – indeed short to medium term rises in this indicator could be indicative of further damage and depletion of wildlife and biodiversity. We advocate a need for qualitative indicators.</p> <p>Further, it is unclear whether the intended positive outcome would be a reduction in the number of people relying on wildlife. Encouraging the use of depleting resources is bound to have further damaging impacts on people and their livelihoods, particularly affecting the most vulnerable. Recovery in the conservation status of wildlife needs to be addressed as an overriding priority.</p> <p>We suggest cross-linking with SDG 1 and associated indicators, as efforts to bring people out of poverty can help reduce reliance on the unsustainable exploitation of wildlife by vulnerable people.</p> <p>For 9.1.2 'Percentage of the population in traditional employment' add 'positively contributing to the sustainable conservation and protection of wild species'.</p>

Recommendation 2 – Increase ambition of the species-focussed Goals and Action Targets to address threats to biodiversity, halt its loss and ensure its recovery

⇒ Options to improve Draft 1.0 in this regard:

Section	Comments and text edit suggestions (in bold)
<p>Goal A, its milestones (CBD/WG2020/3/3)</p> <p>Indicators (CBD/WG2020/3/3/Add.1)</p>	<p>This is a complex Goal addressing multiple components of biodiversity: ecosystem, species and genetic levels. The species component of this Goal is insufficiently ambitious and represents a step back from Aichi Target 12. We suggest separating the ecosystem components of this goal from the species and genetic diversity components.</p> <p>It is widely reported that the current extinction rate may be as much as 1,000-10,000 x background levels. Goal A merely aspires to halt or reverse the increase in the extinction rate, rather than prevent human-induced extinctions as per Aichi Target 12. Further, 'avoiding extinction' is not, in and of itself, a sufficiently ambitious or nuanced Goal – restoring viable wildlife populations within fully functional, healthy ecosystems is what is required. The need for species recovery to encompass cultural and social integrity as well as numbers, and be commensurate with ecosystem stability and functionality, should be incorporated into Goal A.</p> <p>Milestone A.2: While it is good to see both extinction rate and extinction risk referenced, halting or reversing the increase in the extinction rate is unambitious – a decrease in extinction is required, as opposed to reducing the rate at which it is increasing. In addition to focussing on species abundance and distribution, the cultural and social integrity of animal populations should be incorporated, since it is critical to population integrity and wider ecosystem functionality.⁴</p> <p>Milestone A.3: Additional clarity on the baseline against which progress towards achieving this milestone would be beneficial.</p> <p>Regarding associated indicators:</p> <ul style="list-style-type: none"> • Living Planet Index – Present in zero draft but absent in this draft. • Headline Indicator A.03 - Caution is needed with use of Red List Index: it is slow to be updated; many species have still not been assessed; it's a very long-term indicator. • The IUCN Green List of Protected and Conserved Areas could be a valuable additional indicator of the degree to which protection is achieved at a habitat level.⁵ • Headline Indicator A.04 'The proportion of populations within species with a genetically effective population size > 500', , should not be considered as universally applicable since the number of animals that constitutes a viable population within a functional ecosystem, will vary considerably between different species.
<p>Target 4 on species conservation and HWC (CBD/WG2020/3/3)</p>	<p>On species management and recovery: Restoring populations to healthy viable numbers, with a focus on achieving social and cultural integrity consistent with their ecological role should be the focus. Draft 1.0 does not mention rewilding or recovery. This Target should include reference to actions aimed at recovering and, where appropriate, reintroducing species, consistent with established international guidelines and protocols. Carefully managed reintroduction and rewilding programmes can be extremely valuable if appropriate protocols and safeguards are applied and local stakeholders are involved; however without local support they can be disastrous.</p> <p><i>Ex-situ</i> conservation projects are still given prominence despite their peripheral value, particularly for most keystone animal species. The use of <i>ex-situ</i> conservation as an indicator is only viable in cases where such projects have a realistic chance of successful</p>

⁴ <https://www.cms.int/en/news/animal-culture-linked-conservation-first-time>

⁵ <https://iucngreenlist.org/>

reintroductions or enhancements and should be limited to those species for which *ex-situ* keeping and breeding has been identified as a clear conservation need.

Active recovery and conservation management actions also require improved transboundary conservation work and cooperation. The CMS programmes and initiatives, particularly relating to connectivity, could prove useful in developing relevant indicators for this target component.

On human-wildlife conflict:

This sub-Target should be reframed towards human-wildlife co-existence, as recommended in the 2021 WWF-UNEP report⁶ which stated: “*mainstreaming HWC management and the aim of coexistence into global conventions and regional programmes is an urgent necessity*”. It should include actions aimed at implementing practical solutions that develop a culture of co-existence with wildlife, through minimizing the harm caused to individual animals while accounting for indigenous and community values.

There are several historical examples of rural and indigenous communities coexisting with ‘dangerous’ wildlife such as elephants and big cats, including when these were in higher numbers and occupied wider ranges. However, the culture and methods that enabled such coexistence have been largely lost, ignored or are fading out, as a result of changing population demographics and cultural practices. Retaining/relearning indigenous knowledge for best practice should be a key component of this target (cross-link with Target 19).

Headline Indicator (‘4.0.1 Proportion of species populations that are affected by human wildlife conflict’) is not a measure of HWC avoidance or reduction. It should focus not just on the proportion of populations affected, but also the degree to which those populations are affected. Human-wildlife conflict is exacerbated by poor development planning including encroachment into wild areas, particularly when it results in habitat modification leading to an increase in the human-wildlife interface, loss of connectivity and migratory routes, and/or access to key resources. This target should be cross-linked with Target 1: upstream planning preventing the occurrence of HWC, and the connectivity aspects of Target 2. Retaining intact and viable habitats, access to food sources and prey bases are critical aspects of HWC mitigation.

Current gaps in the post-2020 indicators aimed at assessing reductions in human-wildlife conflict must be addressed. ‘Trend in human-wildlife conflicts’ is not necessarily an appropriate measure, since a decrease in human-wildlife conflicts could result from a decline in wild populations that are subject to habitat loss and degradation, retaliatory killing, poaching and other anthropogenic impacts.

The 2017 study ‘Measuring human–wildlife conflicts: Comparing insights from different monitoring approaches’⁷ finds that monitoring systems addressing broader issues beyond providing a record of damage incidents are likely to have a greater effect in reducing human-wildlife conflict in the long-term.

Possible indicators for reduced HWC might bring consideration to the attitudes, tolerance and understanding of people interfacing with wildlife; their living standards and capacities; and the resilience of sustainable rural economies; as well as improved land use planning, the implementation and success of proven methods to mitigate and reduce HWC (such as predator proof fencing around communities and farms in order to mitigate human-elephant conflict), and methods to mitigate and reduce HWC by means not detrimental to the species concerned, nor their welfare, and consideration of ecological rather than administrative boundaries.

⁶ Gross E, Jayasinghe N., Brooks A., Polet G., Wadhwa R. and Hilderink-Koopmans F. (2021) A Future for All: The Need for Human-Wildlife Coexistence. (WWF, Gland, Switzerland).

⁷ Songhurst, A. 2017. Measuring human–wildlife conflicts: Comparing insights from different monitoring approaches. <https://doi.org/10.1002/wsb.773>

Recommendation 3 – Integrate animal health and well-being through the adoption of One Health-One Welfare approaches to reduce zoonotic disease risk and tackle the biodiversity and climate crises

Biodiversity and its benefits are fundamental to human well-being and a healthy planet, however, the First Draft contains few health-related components.

As pointed out in CBD/SBSTTA/24/3/Add.2, “the Biodiversity-inclusive One Health transition is partly covered through proposed Targets 1, 4, 9, 10 and 11, but with no particular focus on a One Health approach” which has been identified by OIE as “a collaborative global approach to understanding risks for human and animal health (including both domestic animals and wildlife) and ecosystem health as a whole”. We also recommend that other holistic approaches, particularly One Welfare, are considered; One Welfare offers broader strategic solutions to address the common drivers of biodiversity loss, climate change, negative health and well-being outcomes and increased human and animal disease risk.

While the exact pathway of the origin of the COVID-19 pandemic continues to be investigated, the COVID-19 crisis has highlighted the risks that commercial wildlife trade and consumption pose to human society. While a great deal of emphasis has been placed on wildlife ‘wet’ markets and trade for human consumption as food, the risks extend to all forms of wildlife exploitation where humans and wildlife come into close contact, and we must not allow the focus to become too narrow.

Through the development of both the Global Action Plan for Biodiversity and Health and the post-2020 GBF (SBSTTA-24 agenda item 9), the CBD, alongside its partners, has an unprecedented opportunity to initiate the transformative approaches necessary to mitigate pandemic risks, halt and reverse biodiversity loss, and reset our fundamental relationship with the natural world.

There is clear scientific evidence that both regulated and unregulated offtake, trade and use of wildlife, particularly birds and mammals, presents threats to human and animal health.⁸

Crowding, stress and injury among wild animals provide the perfect environment for pathogens to spread and mutate, and their close proximity to other animals and people during capture, farming, transportation, butchering, processing and trade creates many opportunities for transmission between individual animals and species, and potentially to people.

We note the WHO, OIE and UNEP interim guidance on actions that national governments should consider adopting urgently with the aim of making traditional markets safer, published in April 2021⁹, which, *inter alia*, recommends the suspension of trade in live caught wild animals of mammalian species for food or breeding purposes, and the closure of sections of food markets selling live caught wild animals of mammalian species as an emergency measure unless demonstrable effective regulations and adequate risk assessment are in place. The document also notes that, while its recommendations focus ‘on the risk of disease emergence in traditional food markets where live animals are sold for food, it is also relevant for other utilisations of wild animals’.

Wild animal welfare should be considered a key element in the prevention of future pandemics. “Just as ‘human health and animal health are interdependent and bound to the health of the ecosystems in which they exist’, preserving and improving animal welfare has various direct and indirect connections with human wellbeing and environmental issues.” (One Welfare approach¹⁰)

⁸ Shivaprakash, K. N., Sen, S., Paul, S., Kiesecker, J. M. & Bawa, K. S. Mammals, wildlife trade, and the next global pandemic. *Current Biology* (2021) doi:10.1016/j.cub.2021.06.006; Taylor, L. H., Latham, S. M. & Woolhouse, M. E. Risk factors for human disease emergence. *Philosophical Transactions of the Royal Society B* 356, 983–989 (2001); Souza, M. J. One health: zoonoses in the exotic animal practice. *Veterinary Clinics of North America Exotic Animal Practice* 14, 421–426 (2011); <https://royalsocietypublishing.org/doi/10.1098/rstb.2016.0167>

⁹ ‘Reducing public health risks associated with the sale of live wild animals of mammalian species in traditional food markets’ (WHO/2019-nCoV/Wet_Markets/2021.1)

¹⁰ <https://www.onewelfareworld.org/>

Developed by veterinarians (and animal experts), One Welfare is a fully comprehensive and multidisciplinary approach which promotes the recognition that animal welfare, biodiversity and the environment are connected to human health and well-being. Incorporating a One Welfare approach is key to ensuring an equitable, sustainable and humane future, as it offers the potential to remove siloes through policy interventions that will not only drastically reduce the risk and impact of future pandemics, but also reduce the risk of other looming disasters, including the accelerating climate change and biodiversity loss crises.

⇒ *Options to improve Draft 1.0 in this regard:*

Section	Comments and text edit suggestions (in bold)
<p>Target 5 on wildlife harvesting, trade and use of wild species</p> <p>(CBD/WG2020/3/3)</p>	<p>Target 5 requires some further clarification if it is to effectively meet a central challenge of the post-2020 GBF: changing business as usual to avoid ecological collapse and the threat of future pandemics of zoonotic origin.</p> <p>None of the current proposed indicators for this target address the risks to human health from exploitation and trade. An indicator should be added, that aligns with the Tripartite (WHO/OIE/FAO)'s guidance under development, as this guidance is to include a list of wildlife species and conditions under which they could present significant risks of transmitting zoonoses, and guidelines towards mitigating these risks.</p> <p>Possible indicators on health:</p> <p>Collaborate with CITES national authorities and other relevant national and international bodies to ensure efficient and rapid transfer of diagnostic samples to appropriate laboratories (CITES permitting has, in the past, delayed/prevented the cross-border transfer of diagnostic samples for analysis).</p>
<p>Target 6 on Invasive Alien Species</p> <p>(CBD/WG2020/3/3)</p>	<p>This target is closely linked with Target 5.</p> <p>We advocate the need to focus on prevention as a far more cost-effective approach attempting to eradicate alien species once they become established.</p> <p>The current target does not include any reference to the humane management of invasive species management. Dubois et al. (2017)¹¹ set out seven principles for ethical wildlife control, the application and implementation of which should be considered as an indicator for this target.</p> <p>Possible indicators:</p> <p>For 5.0.2, we recommend the use of standard Environmental Impact Classification of Alien taxa that scores the damaging impacts of invasive species, since measuring the reduction in number of invasive species is not, in and of itself, a reflection of a reduction in impact on biodiversity.</p>

¹¹ <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/cobi.12896>

Recommendation 4 – Value and embed nature into all decision-making through mainstreaming

Biodiversity is currently under-valued and over-exploited. However, our current economic and financial systems that place little value on nature, so without significant changes it will be difficult to meet objectives in biodiversity and sustainable development. Mainstreaming the protection and recovery of biodiversity into all sectoral policies, plans, programmes, strategies and practices, is therefore critical to the success of the post-2020 GBF. This Target will also support resource mobilisation.

Recent literature increasingly recognising nature's intrinsic value includes:

- Dasgupta Review: 'Nature nurtures and nourishes us, so we will think of assets as durable entities that not only have use value, but may also have intrinsic worth' (page 4); 'biodiversity has an intrinsic value, beyond what we humans impute to it'¹².
- Taylor et al. 2020: 'It is essential to advance moral arguments for biodiversity conservation that are not just based on perceived human interests but on ecocentric values, namely, convictions that species and ecosystems have value and interests that should be respected regardless of whether they serve human needs and aspirations.'¹³

⇒ *Options to improve Draft 1.0 in this regard:*

Section	Comments and text edit suggestions (in bold)
<p>Target 14 on integration of biodiversity values and its indicators</p> <p>(CBD/WG2020/3/3)</p>	<p>It is crucial to include recognition of both tangible and intangible benefits from biodiversity, such as carbon sequestration value, aesthetic and cultural value, contribution to ecosystem services, contribution to human wellbeing etc. (not just about assigning a dollar value) (rebalance. Earth initiative¹⁴)</p> <p>The importance of cross-departmental integration of biodiversity values within governments cannot be overstated. The 2019 IPBES Global Assessment stated that 'a key constituent of sustainable pathways is the reform of global financial and economic systems to engineer a global sustainable economy': the post-2020 GBF needs to place greater emphasis on mainstreaming of biodiversity values into the relevant economic sectors.</p> <p>While governments are responsible for its implementation, businesses and financial institutions are key actors in the delivery of the objectives of the post-2020 GBF (as identified in the draft CBD Long-Term Approach on Mainstreaming).</p> <p>Need to embed nature in all decision-making and disclosure, and integrate the diverse values of biodiversity into accounting systems, budgeting and reporting systems (e.g. natural capital assessment and financial accounting systems), by promoting regulatory measures which allow financial institutions and businesses to align financial flows to a nature-positive world.</p> <p>This target should also better recognise trade-offs between biodiversity conservation and other SDGs, and should be linked to the mandate and work of the other biodiversity-related Conventions, including CITES and CMS. Alignment of updated National Biodiversity Strategies and Action Plans (NBSAPs) with national SDG implementation plans should be ensured. See CBD/SBSTTA/24/INF/1236.</p>

¹² (<https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>, page 49)

¹³ 'The need for ecocentrism in biodiversity conservation', Taylor et al. Conservation Biology Volume 34, No. 5, 2020 <https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1111/cobi.13541>

¹⁴ <https://www.rebalance.earth/>

Recommendation 5 – Adopt robust implementation mechanisms and ensure adequate resourcing for wildlife and nature protection

⇒ *Options to improve Draft 1.0 in this regard:*

Section	Comments and text edit suggestions (in bold)
<p>Goal D on implementation</p> <p>(CBD/WG2020/3/3)</p>	<p>The ambition in this goal seems to have diminished since the zero draft, from "means of implementation are available to achieve all goals and targets", to "the gap between available and necessary funds and other means is closed".</p>
<p>Target 15 on mainstreaming biodiversity in business</p> <p>(CBD/WG2020/3/3)</p>	<p>The GBF should aim to clarify the role of finance and business, identified as key actors for mainstreaming in the draft CBD Long-Term Approach on Mainstreaming¹⁵.</p> <p>Business for Nature sets out eight suggestions, with specific text amendments, for negotiators to include in the post-2020 Global Biodiversity Framework, aiming to strengthen its ambition.¹⁶</p>
<p>Target 18 and its indicators</p> <p>(CBD/WG2020/3/3/ADD1)</p>	<p>Reform, redirect, repurpose or eliminate harmful incentives and subsidies (need reducing them by at least \$500 billion per year)</p> <p>Harmful incentives, including subsidies, are a major indirect driver of biodiversity loss, particularly as they affect decisions around land-use, consumption and production patterns, overexploitation, pollution and climate change.</p> <p>All perverse incentives and harmful subsidies need to be eliminated or repurposed, not just 'most', as reflected in the commitments of the Leaders' Pledge for Nature. More clarity as regards the 'repurposing and reforming' of incentives and subsidies would also be beneficial.</p> <p>The CBD workshop on financial institutions noted that "[...] <i>the brown taxonomy would identify harmful activities that would clearly no longer be financed; (f) Consideration should be given to prioritizing the most harmful industries in order to act on the sectors with the greatest impact. These include intensive livestock farming, agriculture, major extractive industries, luxury goods and related wildlife trade.</i>"¹⁷</p> <p>Proactive incentivisation of and investment in activities that are protective, and where possible restorative (such as agro-environment schemes, well-managed rewilding projects, urban nature initiatives, and efforts to improve connectivity between natural systems) need to be leveraged.</p> <p>A mix of legislative and governance options, policies and management practices should be developed and implemented, through both public and private sectors.</p> <p>This target also needs to promote the decoupling of economic growth from environmental degradation, including through a transformation in economic policies and tax reforms.</p> <p>There could be an indicator assessing the adoption of biodiversity criteria as a prerequisite for investment by international financial bodies and institutions (World Bank, IMF, EIB etc.), and/or the development of policies and criteria aimed at ensuring investments do not harm biodiversity.</p>

¹⁵ <https://www.cbd.int/mainstreaming/>

¹⁶ See <https://www.businessfornature.org/s/BfN-position-on-draft-1-FINAL.pdf>

¹⁷ <https://www.cbd.int/doc/c/3ed9/1639/97979e15a709ad30e88928fe/post2020-om-2021-04-01-en.pdf>

	<p>Monitoring elements that assess how incentives are redirected, repurposed, reformed or eliminated are also required, to ensure coherence with Target 14.</p> <p>The OECD's environmental tax indicator could be used as one of the indicators to assess trends in the development and application of public finance incentives that promote biodiversity conservation and sustainable use.</p>
<p>Target 19 and its indicators</p> <p>(CBD/WG2020/3/3) (CBD/WG2020/3/3/ADD1)</p>	<p>Resource mobilisation, closing financing gap, aligning financial flows. Involve public and private financial sectors.</p> <p>Without a coherent and ambitious strategy for resource mobilization, it will be impossible to achieve the new global biodiversity goals and targets. The need for nature to be appropriately valued in all economies and across all sectors (link with Target 14) will support actions developed to achieve this target.</p> <p>The framework should aim to achieve a sustainable co-existent economy, including by identifying resources beyond traditional aid flows. Deploying and scaling-up innovative financing approaches to support conservation would be highly beneficial and contribute to a new development paradigm, necessary to ensure the growth of sustainable natural systems and moving away from the current monetarist economic model.</p> <p>Currently, the gap between the amount spent on biodiversity conservation and what is needed to achieve the 2030 Mission, is large (estimated at \$700B per year) but can be closed by 2030 if Parties collectively increase funding for biodiversity and eliminate expenditures harmful to biodiversity from all sources.</p> <p>All Parties should develop National Biodiversity Finance Plans and mobilize the necessary resources to fully and effectively implement their NBSAPs.</p> <p>A combination of resources from domestic and international sources as well as from the public and private sectors will be needed.</p> <p>Funding for the recovery of nature must urgently be secured by:</p> <p>i) Incorporating green priorities in budget allocation; (ii) developing green revenue streams (see range of mechanisms developed by the UNDP Biodiversity Financing Initiative (BIOFIN)); (iii) Following fund deployment targets that enhance nature recovery and public health.</p> <p>Caution should be exercised in linking the role of private expenditure to sustainable use. Controversial industries such as wildlife farming can sometimes be portrayed as having a role in conservation but are often strongly linked to demand stimulation for wild animal parts and products, illegal trade, laundering of wild caught animals, illicit financial flows and other criminal activities, as well as increasing the risk of disease emergence and transmission.</p> <p>Official Development Assistance (ODA) does not currently guarantee integration of biodiversity considerations and funding. In its April 2020 report, the OECD offered recommendations for improving the assessment, tracking and reporting of biodiversity finance. These should be considered in the development of indicators to measure the trends in the mobilization of financial resources from public international financial flows.</p> <p>The UNDP Biodiversity Financing Initiative (BIOFIN) also offers solutions to biodiversity financing, alongside outcomes and impacts assessments, which could be adapted for use as indicators.</p>
<p>Sections H to K</p> <p>(CBD/WG2020/3/3)</p>	<p><i>"I. Enabling conditions</i></p> <p><i>16. Efficiency and effectiveness will be enhanced for all by integration with relevant multilateral environmental agreements and other relevant international processes, at the global, regional and national levels provided they are at least equally progressive, including through the strengthening or establishment of cooperation mechanisms."</i></p>

The GBF needs to be adaptable for national level activities, and alignment with the 2030 Agenda, other agreements and MEAs, provided they align and are at least equally progressive.

“J. Responsibility and transparency

*18. (a) Establishing national targets as part of national strategies and action plans and as contributions towards the achievement of the global targets - **which must address all of the key targets of the GBF.**”*

“18. (c) Enabling the evaluation of national and collective actions against targets”. - penalties for non compliance?

“K. Outreach, awareness and uptake

*21. (c) Promoting or developing platforms and partnerships, including with media and civil society, to share information on successes, lessons learned and experiences in acting for biodiversity, **and enabling exposure of failure, corruption or damaging practices, through appropriate whistle-blower protection processes.**”*