



Business for Nature position on the CBD updated zero draft of the Post-2020 Global Biodiversity Framework

Updated version from 6 April 2021

***About Business for Nature** - Business for Nature is a global coalition that brings together business and conservation organizations and forward-thinking companies. Together, we demonstrate credible business leadership on nature and amplify a powerful leading business voice calling for governments to adopt policies now to reverse nature loss this decade. We work with more than 50 international and national partners and a diverse group of businesses from all sectors, sizes and geographies. We encourage companies to commit and act to reverse nature loss, and advocate for greater policy ambition.*

Executive summary

Business for Nature greatly appreciates the efforts of Parties to develop a strong Post-2020 Global Biodiversity Framework, including by better reflecting the need to mainstream biodiversity in the current draft. However, we are concerned that due to some crucial shortcomings, the current draft Framework is still unlikely to trigger the change needed globally and the level of action necessary from the business community to transform our economic and financial systems and reverse nature loss by 2030.

We must learn from the experience of the Aichi Biodiversity Targets. Despite positive efforts by many, unfortunately none of the Targets have been fully met. The Post-2020 Global Biodiversity Framework is an opportunity to address these shortcomings and to adopt an international agreement that would help halt and reverse nature loss by 2030. Doing so would also be an unprecedented opportunity to strengthen and support our collective response to the interconnected issues we currently face. Climate change, nature loss and social inequality need to be tackled together to achieve the Sustainable Development Goals.

We are now calling on governments to make the Post-2020 Global Biodiversity Framework transformative, meaningful, implementable and enforceable. This will require political will, a strong, measurable and prioritized set of enforceable targets, clarity on the duties of different actors, implementation and monitoring tools for different actors, and financial resources and investments.

An ambitious and effective Post-2020 Global Biodiversity Framework has the potential to scale and speed up the action and investments needed from the private sector in order to create sustainable growth, generate clean jobs and potentially unlock \$US trillions in economic opportunities. Let's work together to deliver a global policy environment that accelerates collective leadership on nature and shows that the transition to a nature-positive world is both necessary and achievable.

Building on our [policy recommendations](#) and input from over one hundred businesses head-quartered in 31 countries, Business for Nature is proposing 9 suggestions to strengthen the ambition of the updated zero draft of the Post-2020 Framework:

Provide direction by adopting a clear and ambitious mission with measurable milestones

1. Adopt the mission to halt and reverse biodiversity loss by 2030

Enable meaningful and constructive business contributions in the Framework implementation

2. Set 2030 targets that are SMART, relevant and actionable by all actors, including businesses
3. Provide a clear role for businesses and financial institutions in the Framework

Embed and value nature in all decision-making at all levels

4. Support the integration of nature in all decision-making to go beyond short-term profit and GDP
5. Mainstream biodiversity across all levels of government, society and economic sectors

Rethink incentive mechanisms and resource mobilization: end harmful subsidies and promote innovative solutions

6. Eliminate and redirect all subsidies and incentives that are harmful for biodiversity
7. Promote the rapid development and implementation of innovative financial solutions

Align, integrate and ensure the implementation of the Framework

8. Adopt a robust monitoring, reporting and reviewing mechanism, including a ratchet mechanism
9. Pursue an integrated approach to delivering on the objectives of both the CBD and the UNFCCC

For each of these suggestions we are proposing concrete textual amendments, accompanied by a short rationale. These are presented in the following sections of this document.

Provide direction by adopting a clear and ambitious mission with measurable milestones

Businesses need and expect governments to provide direction and urgency at the highest political level to set the direction for positive business actions on nature. Long-term certainty is vital to encourage the uptake of nature-positive business models and to orient investments and business decision-making processes around the protection, restoration and sustainable use of nature and natural resources.

Suggestion 1 – Adopt the mission to halt and reverse biodiversity loss by 2030

The current proposed mission does not reflect the ambition level needed to achieve the 2050 vision and must therefore be strengthened. A clear and ambitious mission to halt and reverse biodiversity loss by 2030 is an essential element of the Framework. This would simplify the nature agenda, guide investment decisions and ultimately provide direction for all. This mission is supported by a group of 16 organisations: <https://www.naturepositive.org/>

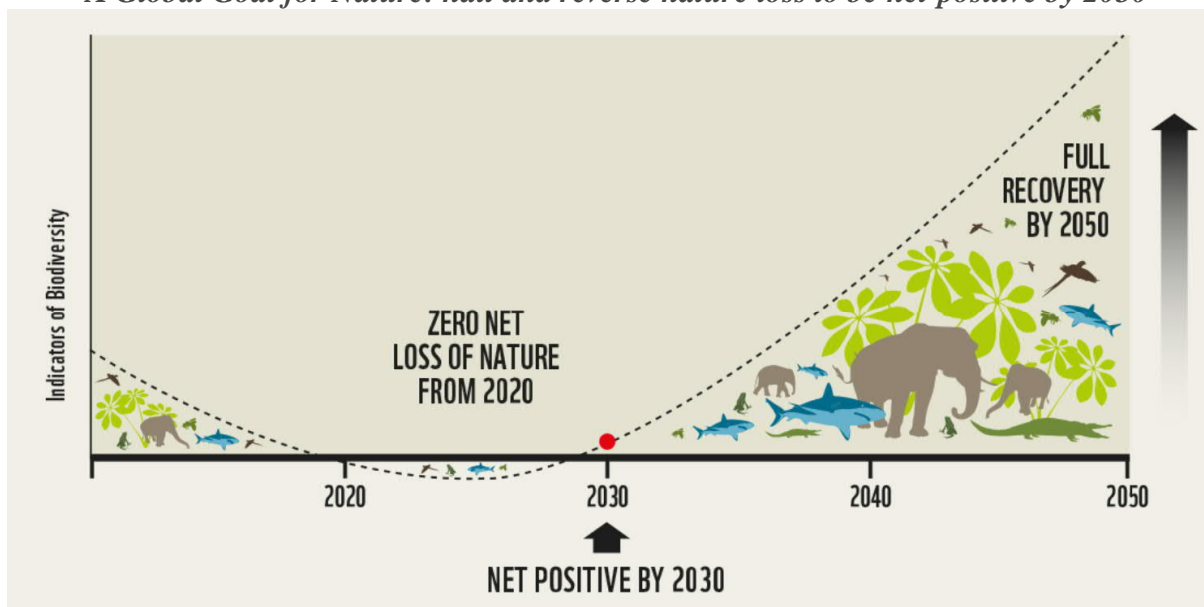
2050 goals are important but do not create the needed sense of urgency for action. Strong and measurable 2030 milestones are essential to demonstrate the urgency to act now and to set the direction. Achieving the vision and mission of the Framework is impossible if the key drivers of biodiversity loss are not addressed. Therefore, a specific 2030 milestone focused on reducing the environmental footprints of production and consumption would send a clear signal to investors and the private sector of the direction of travel.

The proposed text amendments for this suggestion are:

1.1	Current text	Suggested amendment
	<p>Section C – 2030 Mission</p> <p>11. The 2030 Mission for this framework is:</p> <p>To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people.</p>	<p>Section C – 2030 Mission</p> <p>11. The 2030 Mission for this framework is:</p> <p>To take urgent action across society to halt and reverse biodiversity loss by 2030 and put biodiversity on a path to recovery for the benefit of planet and people.</p>

Justification: The current wording does not reflect the ambition level needed to achieve the 2050 vision to live in harmony with nature, and therefore needs to be strengthened. “On a path to recovery” does not give a clear goal. The science is clear that we have 10 years to address the loss of biodiversity and nature. That means that by 2030, we must have halted and reverse nature loss to be net-positive measured from a baseline of 2020: nature must start to recover, through improvements in the health, abundance, diversity and resilience of species, populations and ecosystems so that by 2050 we can achieve the CBD vision. The proposed mission in this amendment is aligned with the curve A from the [SBSTTA document 24-03-Add2](#).

A Global Goal for Nature: halt and reverse nature loss to be net-positive by 2030



This mission is supported by a group of 16 organisations: <https://www.naturepositive.org/>

1.2	Current text	Suggested amendment
	<p>Section C – Theory of change</p> <p>5. The framework is built around a theory of change (see figure 1) which recognizes that urgent policy action globally, regionally and nationally is required to transform economic, social and financial models so that the trends that have exacerbated biodiversity loss will stabilize in the next 10 years (by 2030) and allow for the recovery of natural ecosystems in the following</p>	<p>Section C – Theory of change</p> <p>5. The framework is built around a theory of change (see figure 1) which recognizes that urgent policy action globally, regionally and nationally is required to transform economic, social and financial models so that the trends that have exacerbated biodiversity loss will stabilize are reversed in the next 10 years (by 2030) and allow for the full recovery of natural ecosystems in the</p>

20 years, with net improvements by 2050 to achieve the Convention’s vision of “living in harmony with nature by 2050”.	following 20 years with net improvements (by 2050) to achieve the Convention’s vision of “living in harmony with nature by 2050”.
<i>Justification: This section should be aligned with the mission and reflect the level of ambition of the vision. By 2050, nature must recover so that thriving ecosystems and nature-based solutions support future generations and the diversity of life, and play a critical role in halting climate change.</i>	

Enable meaningful and constructive business contributions in the Framework implementation

Current economic and business practices are putting nature under ever-increasing pressure. The private sector therefore has the responsibility to co-lead the transformation needed to reverse nature loss by 2030. Businesses play a critical role beyond committing and acting within their direct sphere of influence: they are a source of investment, a driver of innovation and technological development, and a key engine of economic prosperity and employment.

While Parties are responsible for the implementation of the Post-2020 Framework, its objectives cannot be achieved without the meaningful and constructive contribution of businesses in implementing the Framework. This will happen only if the Framework includes targets that are relevant and actionable by businesses and explicitly foresee the role of business in achieving the Framework mission and goals. This is not yet the case and must be addressed, if we are to learn from the Aichi targets. The Post-2020 Framework should therefore:

Suggestion 2 - Set 2030 targets that are SMART, relevant and actionable for all key actors, including businesses.

The 2030 mission and milestones should be supported by SMART (Specific, Measurable, Attainable, Realistic, and Time-bound) targets which are informed by science, relevant and actionable for businesses and translatable from global to local levels.

Such targets should be adopted in order for the business community to be accountable to address:

- Ecosystem services protection and restoration (target 3)
- Food, land and ocean systems transformation (target 9)
- Productive sectors transformation and production footprints (target 14)
- Consumption footprints (target 15)

SMART targets are also needed to:

- Eliminate harmful subsidies and redirect them to finance a just transition (see suggestion 6)
- Ensure effective implementation and enforcement of the Framework (see suggestion 8)

The current targets are not yet adequately SMART, implementable or enforceable and are not relevant enough for businesses and other key actors. As a result, businesses and other actors would not be able to focus actions. The current targets proposed in the draft do not yet address the indirect drivers of biodiversity loss, embody the correct level of ambition or focus on the key levers necessary for transformation.

The Post-2020 GBF Monitoring Framework will be essential to provide specific indicators to ensure the implementation and monitoring of the progress towards the targets, and to ensure that they are enforceable.

The proposed text amendments for this suggestion are:

2.1	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 3. By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%].</p>	<p>Section E – 2030 Action Targets</p> <p>Target 3. By 2030, ensure active management actions to increase the conservation and recovery of enable wild species of fauna and flora, and restoration of ecosystems and the ecosystem services they provide by [X%], recovery and conservation, and reduce human-wildlife conflict by [X%].</p>
<p><i>Justification: For effective engagement of business, it is essential to introduce the concepts of ecosystem services, nature’s benefits to people, and the need for their conservation and restoration. Indeed, the mention of ecosystem restoration is a key factor to promote investment in sustainable landscape management.</i></p>		

2.2	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 9. By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%].</p>	<p>Section E – 2030 Action Targets</p> <p>Target 9: By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%] transform food, land and ocean systems to ensure they meet people's needs within planetary boundaries, require value chain traceability and accountability, reduce food waste and post-harvest loss by 50%, and reduce the global footprint of diets by 50%.</p>
<p><i>Justification: While managed ecosystems indeed need to support productivity, sustainability and resilience of biodiversity, this target needs to be further strengthened to refer to the main drivers of biodiversity loss. Indeed, land and sea use is identified at the main driver of biodiversity loss by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). This target is currently too weak, both in terms of ambition and comprehensiveness, to drive the required transformation towards sustainable food and agricultural systems. The proposed wording reflects the lessons learned from the Aichi Targets described in GBO-5.</i></p> <p><i>Focusing purely on reducing productivity gaps is too narrow. It misses the broader need to transform the food, land and ocean systems, across the value chain, in order to reduce the environmental footprints within planetary boundaries.</i></p>		

2.3	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 14. By 2030, achieve reduction of at least [50%] in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable.</p>	<p>Section E – 2030 Action Targets</p> <p>Target 14. By 2030, achieve a reduction of at least [50%] in negative impacts on biodiversity from ensuring production practices and supply chains are sustainable, including by developing and</p>

	implementing national, regional and global action plans for all productive sectors and their national and trans-national supply chains, to transition to a sustainable, just, and nature-positive economy that internalizes the value of biodiversity.
<i>Justification: A target specifically focusing on productive sectors is essential to engage these sectors in the implementation of the Framework. The target 14 should therefore be strengthened, to promote just and nature-positive transitions in productive sectors. These plans should be developed in a collaborative way through a multi-stakeholder engagement led by governments and implemented collectively by all actors. They should be supported by the wider system of finance and incentives. To achieve the mission to reverse nature loss by 2030, unavoidable negative impacts from production will need to be compensated through restoration and additional protection.</i>	

2.4	Current text	Suggested amendment
	Section E – 2030 Action Targets Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions.	Section E – 2030 Action Targets Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions, including by adopting policies and measures to incentivize the demand for more sustainable products and services and stimulate the large-scale adoption of a circular economy.
<i>Justification: To ensure that change happens at the scale and speed needed, incentives, such as public procurement, are key to accelerate the transition effectively. Building understanding and appreciation for the value of biodiversity through knowledge and education will not be enough.</i>		

Suggestion 3 – Provide a clear role for businesses and financial institutions in the Framework

While governments are responsible for its implementation, businesses and financial institutions are key actors to deliver the objectives of the Post-2020 Framework. The draft should recognize, strengthen and clarify the role of business and finance as part of the solution, as they are recognized as one of the three key actors for mainstreaming (as identified in the draft CBD Long-Term Approach on Mainstreaming).

Indeed, while leading businesses understand and are working towards the Sustainable Development Goals and the Paris Agreement targets, businesses to date have been less familiar with the Aichi Biodiversity Targets. If the Post-2020 Framework explicitly recognizes and provides a clear role for businesses and financial institutions, it has the potential to start addressing this shortcoming.

The Framework must also recognize, respect and protect the land and water rights of indigenous people and local communities, and ensure that their right to Free, Prior Informed Consent is respected. Full and effective participation of indigenous peoples, local communities, and women and girls is critical. The Post-2020 Framework must recognize the unique importance of these stakeholders.

The proposed text amendments for this suggestion are:

3.1	Current text	Suggested amendment
	<p>INTRODUCTION – Section B</p> <p>The purpose</p> <p>The framework will be implemented primarily through activities at the national level, with supporting action at the subnational, regional and global levels. It aims to promote synergies and coordination with relevant processes. It provides a global, outcome-oriented framework for the development of national, and as appropriate, regional, goals and targets and, as necessary, the updating of national biodiversity strategies and action plans to achieve these, and to facilitate regular monitoring and review of progress at the global level.</p>	<p>INTRODUCTION–Section B</p> <p>The purpose</p> <p>The framework will be implemented primarily through activities at the national level, with supporting action at the subnational, transnational, regional and global levels. It aims to promote synergies and coordination with relevant processes. It provides a global, outcome-oriented framework for the development of national, and as appropriate, regional, goals and targets with key SMART indicators and, as necessary, the updating of national biodiversity strategies and action plans assigning clear actions to governments, business and society as identified by the LTAM, to create accountability to achieve these, and to facilitate regular monitoring and review of progress at the global level.</p>
<p><i>Justification: The introduction paragraph should stress the role and responsibility of the private sector, as action is needed across society, linking private and public actions. To facilitate action, it is important to refer to transnational cooperation because private companies often operate across national boundaries. The implementation of the Framework can only be successful if each stakeholder is given a clear role to play, with an illustrative roadmap and strong accountability.</i></p>		

3.2	Current text	Suggested amendment
	<p>Section C – Theory of change</p> <p>The theory of change for the framework acknowledges the need for appropriate recognition of gender equality, women’s empowerment, youth, gender-responsive approaches and the full and effective participation of indigenous peoples and local communities in the implementation of this framework. Further, it is built upon the recognition that its implementation will be done in partnership with many organizations at the global, national and local levels to leverage ways to build a momentum for success. It will be implemented taking a rights-based approach and recognizing the principle of intergenerational equity.</p>	<p>Section C – Theory of change</p> <p>The theory of change for the framework acknowledges the need for appropriate recognition of gender equality, women’s empowerment, youth, gender-responsive approaches and the full and effective participation of indigenous peoples and local communities in the implementation of this framework. Further, it is built upon the recognition that its implementation willmust be done in partnership with many organizations at the global, national and local levels, with both private and public sectors and civil society, to leverage ways to build a momentum for success. It will be implemented taking a rights-based approach and recognizing the principle of intergenerational equity.</p>
<p><i>Justification: The theory of change should stress the role and responsibility of the private sector. Action is needed across society, linking private and public actions.</i></p>		

3.3	Current text	Suggested amendment
	<p>Section G – Enabling conditions</p> <p>14 - (b) The participation of all relevant stakeholders, non-governmental organizations, youth, civil society, local and subnational authorities, the private sector, academia and scientific institutions through a whole-of-society approach and through inclusive and representative multi-stakeholder and multisectoral platforms;</p>	<p>Section G – Enabling conditions</p> <p>14 - (b) The participation of all relevant stakeholders, non-governmental organizations, youth, civil society, local and subnational authorities, the private sector, academia and scientific institutions through a whole-of-society approach that integrates business plans and commitments on nature in national commitments, and through inclusive and representative multi-stakeholder and multisectoral platforms;</p>
<p><i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. To empower businesses to act at the necessary scale and urgency, the Framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans. For that, national strategies and commitments should include business plans and commitments as part of a joint public-private approach to reverse nature loss.</i></p>		

3.4	Current text	Suggested amendment
	<p>Section G – Enabling conditions</p> <p>[NEW]</p>	<p>Section G – Enabling conditions</p> <p>14 - [NEW] The implementation of landscape and seascape, as well as jurisdictional approaches, including through the promotion of supply-chain and/or sectoral collaboration mechanisms and multi-sectoral, multi-stakeholder platforms;</p>
<p><i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. Governments play an important role in empowering society to collaborate and act for nature. Traditional models of conservation have failed to enable countries to reach the Aichi targets, and it is therefore crucial to implement innovative collaboration models for the protection, restoration and sustainable use of natural resources.</i></p>		

3.5	Current text	Suggested amendment
	<p>Section H – Responsibility and transparency</p> <p>17. a. Planning:</p> <p>[NEW]</p>	<p>Section H – Responsibility and transparency</p> <p>17. a. Planning:</p> <p>i. [NEW] - Should include non-State actors’ plans and commitments.</p>
<p><i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. To empower businesses to act at the necessary scale and urgency, the Framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans. National strategies and commitments should include business plans and commitments as part of a joint public-private approach to reverse nature loss.</i></p>		

4.2	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – b Capacity development</p> <p>[NEW]</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – b Capacity development</p> <p>[NEW] (iv) Supporting and requiring business to internalize environmental externalities and integrate their impact and dependencies on nature in decision-making, risk management, supply chain management and external disclosure. This will require:</p> <p>a) standardizing metrics, tools and guidance to undertake robust corporate natural capital assessments and accounting;</p> <p>b) promoting guidance on nature-related financial disclosures; and</p> <p>c) providing contextual natural capital data from national statistical systems.</p>
<p><i>Justification: Identifying, measuring, valuing and externally disclosing impacts and dependencies on nature is relatively new for most businesses. Therefore, capacity development and standardized metrics, tools and guidance must be provided in addition to requiring businesses to internalize environmental externalities in decision-making and disclosure.</i></p> <p><i>Parties could support the development and implementation of a Task Force on Nature-Related Financial Disclosure (TNFD) and its linkage to the existing TCFD. Indeed, a commonly accepted way to report nature-related risks and dependencies is required to support the inclusion of biodiversity in financial decision-making and investment, as with the TCFD on climate. Such an exercise needs to parallel or be linked to existing TCFD efforts.</i></p>		

4.3	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – b Capacity development</p> <p>[NEW]</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – b Capacity development</p> <p>[NEW] (vi) Supporting and training the appropriate government organizations to implement the updated System of Environmental - Economic Accounting (SEEA-EA), with the aim to mainstream biodiversity into government accounting and use this as a basis to provide economy-related data on biodiversity to business.</p>
<p><i>Justification: Valuing and embedding nature in decision-making and disclosure is one of the key challenges that both the public and private sectors face. Governments can lead by example by implementing the agreed statistical framework for natural capital accounting. They can also further promote this approach to private actors by enabling them to use the improved statistical data on nature in relation to economic activities, and through this provide context for decision-useful information.</i></p>		

Suggestion 5 - Mainstream biodiversity across all levels of government, all sectors of society and economic sectors

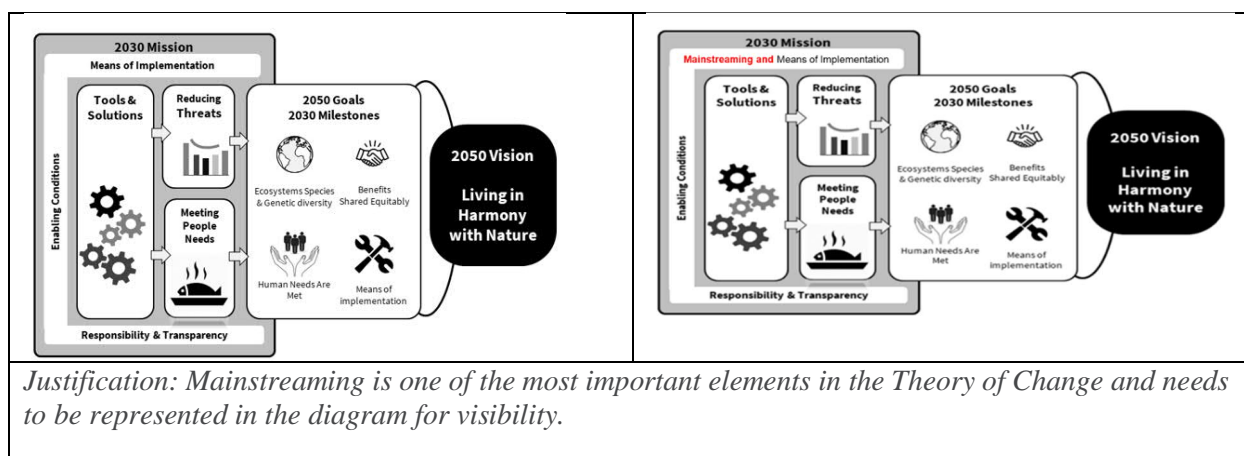
Mainstreaming biodiversity is a critical condition to achieving the objectives of the Framework and there is an urgent need to adequately integrate biodiversity mainstreaming in the Framework. Biodiversity should be integrated into the mandates of all relevant policies, ministries, and finance regulators if we are to address the major drivers of nature loss.

The proposed text amendments for this suggestion are:

5.1	Current text	Suggested amendment
	INTRODUCTION	INTRODUCTION
	Section B	Section B
	2. The framework aims to galvanize urgent and transformative action by Governments and all of society, including indigenous peoples and local communities, civil society, and businesses, to achieve the outcomes it sets out in its vision, mission, goals and targets, and thereby to contribute to the objectives of the Convention on Biological Diversity and other biodiversity related multilateral agreements, processes and instruments.	2. The framework aims to galvanize urgent, transformative, and collective action by all relevant Government ministries, finance regulators and all of society, including indigenous peoples and local communities, civil society, businesses and financial institutions , to achieve the outcomes it sets out in its vision, mission, goals and targets, and thereby to contribute to the objectives of the Convention on Biological Diversity and other biodiversity related multilateral agreements, processes and instruments.
<i>Justification: A key element of mainstreaming is to ensure that nature is embedded in decision-making across all ministries, especially finance/treasury, and financial institutions. See the CBD Long-Term Approach on Mainstreaming.</i>		

5.2	Current text	Suggested amendment
	Section C – Theory of change	Section C – Theory of change
	5. [...] As such, Governments and societies need to determine priorities and allocate financial and other resources, internalize the value of nature and recognize the cost of inaction.	5. [...] As such, all actors needed to mainstream nature (the whole-of-Government, business, financial institutions and civil society organizations) need to determine priorities and allocate financial and other resources, internalize the value of nature in decision-making at all levels and recognize the cost of inaction.
<i>Justification: Mainstreaming requires action by all of society to include nature in decision-making at all levels. See the CBD Long-Term Approach on Mainstreaming.</i>		

5.3	Current text	Suggested amendment
	Section C – Theory of change	Section C – Theory of change
		Diagram: Introduce “Mainstreaming” into the diagram by changing “Means of implementation” to “Mainstreaming and Means of implementation”



5.4	Current text	Suggested amendment
	<p>Section D – 2030 Milestones</p> <p>B.2. Nature is valued through green investments, ecosystem service valuation in national accounts, and public and private sector financial disclosures.</p>	<p>Section D – 2030 Milestones</p> <p>B.2. Nature is valued and embedded in decision-making, disclosure and market mechanisms across governments, businesses, financial institutions and civil society through green investments, ecosystem service valuation in national and business accounts, and public and private sector financial disclosures, and all investments.</p>
<p><i>Justification: A key element of transformation is to value and embed nature into all actors' decision-making. This milestone should reflect the four parts of society as identified by the CBD Long Term Approach on Mainstreaming (i.e., governments, businesses, financial institutions and civil society). "Green" investments seem limiting, especially now that mainstream financial institutions are recommending ESG investments as the default option.</i></p>		

5.5	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 13. By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into assessments of environmental impacts.</p>	<p>Section E – 2030 Action Targets</p> <p>Target 13. By 2030, integrate biodiversity values into policies, finance, regulations, planning, development processes, poverty reduction strategies and frameworks, accounts and metrics at all levels, ensuring that biodiversity values are mainstreamed across all ministries and sectors and integrated into financial planning and assessments of environmental impacts.</p>
<p><i>Justification: Finance and frameworks/metrics should be added to better reflect the transformation needed. Target 13 should promote a whole-of-government approach, that recognizes the importance of nature-based solutions and synergies between the various national and global policies and processes.</i></p> <p><i>This would help avoid negative biodiversity impacts, contribute to positive impacts, unlock the full potential of nature-based solutions, and maximize synergies and policy coherence between different national and global policies and processes.</i></p>		

Rethink incentive mechanisms and resource mobilization: end harmful subsidies and promote innovative solutions

Transformative changes cannot be achieved without proper incentive mechanisms and financial resources. This has been identified as a key element of failure in the Aichi targets. It is essential that the Framework identifies and promotes all sources available from both the public and private sectors and should therefore:

Suggestion 6 – Eliminate and redirect all subsidies and incentives that are harmful for biodiversity

A systemic change in subsidies and incentives has the potential to leverage a large financial contribution to nature if it is redirected to support positive actions and to reward business leadership to design innovative, circular and profitable business models that deliver positive long-term outcomes on nature.

We strongly regret that the wording of target 17 has been weakened in the updated draft. If we are to collectively reverse nature loss by 2030, harmful subsidies must be completely eliminated, and harmful practices must not be incentivized in any direct or indirect way. Only then can we create a level-playing field for businesses, which strongly encourages rapid transformation of business models.

The proposed text amendments for this suggestion are:

6.1	Current text	Suggested amendment
	Section E – 2030 Action Targets	Section E – 2030 Action Targets
	Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.	Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [full] reduction in the most harmful direct and indirect subsidies and tax policies , ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.
<p><i>Justification: This target is too weak. Eliminating harmful subsidies is an essential step in changing the rules of the game and in ensuring appropriate resource mobilization. That is why it is important for all harmful incentives and subsidies to be redirected towards sustainable use, resilience, restoration, and circularity. Target 17 should be strengthened to reflect the need to review, disclose, and entirely eliminate direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature. This is reflected in the commitments of the Leaders’ Pledge for Nature.</i></p> <p><i>For reference about the definition of harmful subsidies, please see this OECD report “Environmentally Harmful Subsidies – Policy issues and challenges”</i></p>		

6.2	Current text	Suggested amendment
	Section F – Implementation support mechanisms	Section F – Implementation support mechanisms
	Article 13 – a	Article 13 - a

(ii) Reducing or redirecting resources causing harm to biodiversity;	(ii) A systemic change in subsidies and incentives Reducing to eliminate or redirecting resources those causing harm to biodiversity and redirect them to incentivize practices that support sustainable use, resilience, restoration and circularity, as well as the integration of nature and nature-based solutions into public and private procurement policies and infrastructure development guidelines and promotion of net gain requirements with adherence to the mitigation hierarchy for all major development sectors.
<i>Justification: Eliminating harmful subsidies is an essential step to change the rules of the game and ensure appropriate resource mobilization. That is why it is important for these incentives and subsidies to be redirected towards sustainable use, resilience, restoration, and circularity. The Framework should reflect the need to review, disclose, and entirely eliminate direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature. This is reflected in the commitments of the Leaders' Pledge for Nature.</i>	

Suggestion 7 - Promote the rapid development and implementation of innovative financial solutions

Promote the rapid development and implementation of innovative financial solutions such as green financing, large public funds and blended finance schemes to finance nature, including small and large-scale nature-based solutions. In addition, and to accelerate the transition to a nature-positive economy, financial institutions should be actively incentivized to consider biodiversity impacts. This could include internal exclusion policies, thematic funds, and active engagement.

The proposed text amendments for this suggestion are:

7.1	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 - a (iii) Generating additional financial and non-financial resources from all sources, including from international and domestic sources and the public and private sectors;</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 - a (ii) Generating additional financial and non-financial resources from all sources, including from international and domestic sources and the public and private sectors, including the promotion and implementation of innovative financial solutions such as green financing, large public funds, and blended finance schemes to finance nature, including small and large-scale nature-based solutions, and support efforts on greening the financial system.</p>
<i>Justification: The Post-2020 Framework needs to help unlock the innovative, transformative power of the full financial sector. It is therefore important that the role of innovative and new finance be recognized, and that actors from this sector are called on to contribute.</i>		

7.2	Current text	Suggested amendment
	Section F – Implementation support mechanisms	Section F – Implementation support mechanisms
	Article 13 – a Mobilizing sufficient resources	Article 13 – a Mobilizing sufficient resources
	(iv) Enhancing the effectiveness and efficiency of resource use;	(iv) Enhancing the effectiveness and efficiency of resource use, including the adoption of mechanisms and quantifiable indicators to value ecosystem services delivery and reward sustainable natural resources management.

Align, integrate and ensure the implementation of the Framework

Suggestion 8 – Adopt a robust monitoring, reporting and reviewing mechanism, including a ratchet mechanism

Ambitious goals and missions will only be effective if this ambition is implemented by governments at national and local levels and also by other actors, including business, that are co-responsible in leading the change. Implementation under the CBD continues to face challenges as the Global Biodiversity Outlook 5 stressed that none of the Aichi Targets have been met, in part due to implementation difficulties.

Therefore, closing the implementation gap must be a key priority of the Framework. It should include a robust monitoring, reporting and reviewing mechanism, coupled with a ratchet mechanism to ensure that actions are adapted to the change needed. A strong implementation mechanism is essential for businesses as we can only ensure a level playing field globally if the Framework is consistently implemented.

The proposed text amendments for this suggestion are:

8.1	Current text	Suggested amendment
	Section E – 2030 Action Targets	Section E – 2030 Action Targets
	[NEW]	[NEW] Target xx: Ensure the adoption and effective enforcement of environmental laws and standards, including by providing capacity development to countries worldwide.
<i>Justification: It is essential that CBD's goals are translated into national laws and regulations that are enforced, to ensure a level global playing field for business and therefore encourage business action for nature.</i>		

8.2	Current text	Suggested amendments
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<p>Section E – 2030 Action Targets</p> <p>[NEW]</p>	<p>Section E – 2030 Action Targets</p> <p>[NEW] Target xx: Establish an effective, comprehensive and cyclical implementation mechanism including the three following components:</p> <ul style="list-style-type: none"> • by 2022, translate this framework and its targets into relevant national and regional planning processes, including strengthened NBSAPs; • by 2024, review the progress made in implementing this framework; • by 2026, ramp up the delivery of plans and actions at the national and regional level. <p>This four-year cycle will repeat itself, with another review of progress by 2028 and another ramping up of plans and actions by 2030.</p>
<p><i>Justification: Such an iterative process in the implementation of the Framework is essential to ensure that once Parties have collectively assessed how much progress they have made towards achieving the targets, they have the opportunity to ramp up the delivery of their biodiversity plans and commitments and to strengthen their national targets. This should be an opportunity for Parties to request additional technical and financial support to achieve their plans and commitments. Such a cycle would demonstrate to business leaders that policies to protect biodiversity will continue to increase and thereby incentivize companies to incorporate ever more stringent nature protection policies into their long-term strategy.</i></p>	

8.3	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>[NEW]</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 (e) NEW - a ratchet mechanism informed by science to ensure that the 2050 vision and 2030 mission are achieved.</p>
<p><i>Justification: a simple and cyclical ratcheting process should be introduced, so that Parties ramp up the delivery of their biodiversity plans and commitments and strengthen their national targets if needed. Such a cycle would demonstrate to business leaders that policies to protect biodiversity will continue to increase and thereby incentivize companies to incorporate ever more stringent nature protection policies into their long-term strategy.</i></p>		

Suggestion 9 – Pursue an integrated approach to delivering on the objectives of both the CBD and the UNFCCC

Climate change, nature loss and social inequality need to be tackled together to achieve a just transition. Policy coherence is vital to break silos and achieve the Sustainable Development Goals. An integrated approach to National Biodiversity Strategies and Action Plans (NBSAPs) and Nationally Determined Contributions (NDCs) that recognizes their synergies, co-benefits, and trade-offs should be pursued. In addition, the same approach can be taken with the National Action Programs (NAPs) of the UN Convention to Combat Desertification (UNCCD).

The proposed text amendment for this suggestion is:

9.1	Current text	Suggested amendment
	<p>Section H – Responsibility and transparency</p> <p>16. This system minimizes the burden on Parties, the Secretariat and other entities. It is aligned with, and where appropriate integrated with other processes and other relevant multilateral conventions including Agenda 2030 and the Sustainable Development Goals.</p>	<p>Section H – Responsibility and transparency</p> <p>16. This system minimizes the burden on Parties, the Secretariat and other entities. It is aligned with, and where appropriate integrated with other processes and other relevant multilateral conventions including Agenda 2030 and the Sustainable Development Goals and developed in an integrated way with the UNFCCC Nationally Determined Contributions (NDCs) to recognize their synergies, co-benefits and trade-offs.</p>
<p><i>Justification: There is a mutual interdependence of solving the interconnected crises of climate change, nature loss and social inequality so they must be tackled together to achieve a just transition. While the Post-2020 Framework needs to be linked to all relevant Multilateral Environmental Agreements (MEAs), the integration with UNFCCC and the NDCs is essential to deliver climate/nature/people synergies and is key to ensuring coherent and effective action plans that receive buy in from a range of stakeholders. Companies are increasingly reporting and aligning activities with the SDGs, so referencing the relevant SDGs would also be welcomed.</i></p>		

- END -

ANNEX 1 – Proposed amendments in the order of the draft

For ease of reference, this annex presents the proposed amendments in the order of the updated zero draft of the Post-2020 Global Biodiversity Framework. The proposed amendments are the same as the one above.

Proposed amendments to the introduction

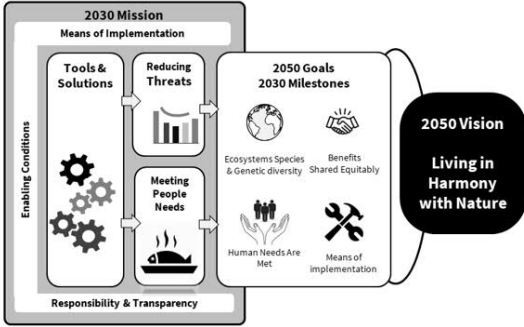
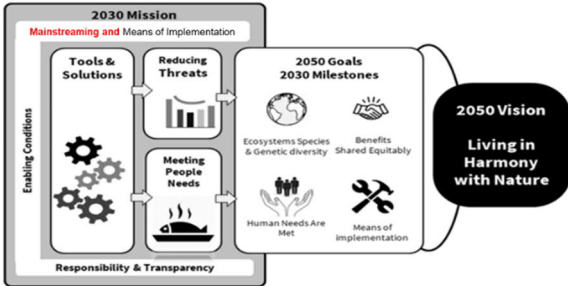
5.1	Current text	Suggested amendment
	<p>INTRODUCTION</p> <p>Section B</p> <p>2. The framework aims to galvanize urgent and transformative action by Governments and all of society, including indigenous peoples and local</p>	<p>INTRODUCTION</p> <p>Section B</p> <p>2. The framework aims to galvanize urgent, transformative, and collective action by all relevant Government ministries, finance</p>

communities, civil society, and businesses, to achieve the outcomes it sets out in its vision, mission, goals and targets, and thereby to contribute to the objectives of the Convention on Biological Diversity and other biodiversity related multilateral agreements, processes and instruments.	regulators and all of society, including indigenous peoples and local communities, civil society, businesses and financial institutions , to achieve the outcomes it sets out in its vision, mission, goals and targets, and thereby to contribute to the objectives of the Convention on Biological Diversity and other biodiversity related multilateral agreements, processes and instruments.
<i>Justification: A key element of mainstreaming is to ensure that nature is embedded in decision-making across all ministries, especially finance/treasury, and financial institutions. See the CBD Long-Term Approach on Mainstreaming.</i>	

3.1	Current text	Suggested amendment
	INTRODUCTION – Section B The purpose The framework will be implemented primarily through activities at the national level, with supporting action at the subnational, regional and global levels. It aims to promote synergies and coordination with relevant processes. It provides a global, outcome-oriented framework for the development of national, and as appropriate, regional, goals and targets and, as necessary, the updating of national biodiversity strategies and action plans to achieve these, and to facilitate regular monitoring and review of progress at the global level.	INTRODUCTION–Section B The purpose The framework will be implemented primarily through activities at the national level, with supporting action at the subnational, transnational , regional and global levels. It aims to promote synergies and coordination with relevant processes. It provides a global, outcome-oriented framework for the development of national, and as appropriate, regional, goals and targets with key SMART indicators and, as necessary, the updating of national biodiversity strategies and action plans assigning clear actions to governments, business and society as identified by the LTAM, to create accountability to achieve these, and to facilitate regular monitoring and review of progress at the global level.
<i>Justification: The introduction paragraph should stress the role and responsibility of the private sector as action is needed across society, linking private and public actions. To facilitate action, it is important to refer to transnational cooperation as private companies often operate across national boundaries. The implementation of the Framework can only be successful if each stakeholder is given a clear role to play, with an illustrative roadmap and strong accountability.</i>		

5.2	Current text	Suggested amendment
	Section C – Theory of change 5. [...] As such, Governments and societies need to determine priorities and allocate financial and other resources, internalize the value of nature and recognize the cost of inaction.	Section C – Theory of change 5. [...] As such, all actors needed to mainstream nature (the whole-of-Government, business, financial institutions and civil society organizations) need to determine priorities and allocate financial and other resources, internalize the value of nature in decision-making at all levels and recognize the cost of inaction.

Justification: Mainstreaming requires action by all of society to include nature in decision-making at all levels. See the CBD Long-Term Approach on Mainstreaming.

5.3	Current text	Suggested amendment
	<p>Section C – Theory of change</p> 	<p>Section C – Theory of change</p> <p>Diagram: Introduce “Mainstreaming” into the diagram by changing “Means of implementation” to “Mainstreaming and Means of implementation”</p> 
	<p><i>Justification: Mainstreaming is one of the most important elements in the Theory of Change and needs to be represented in the diagram for visibility.</i></p>	

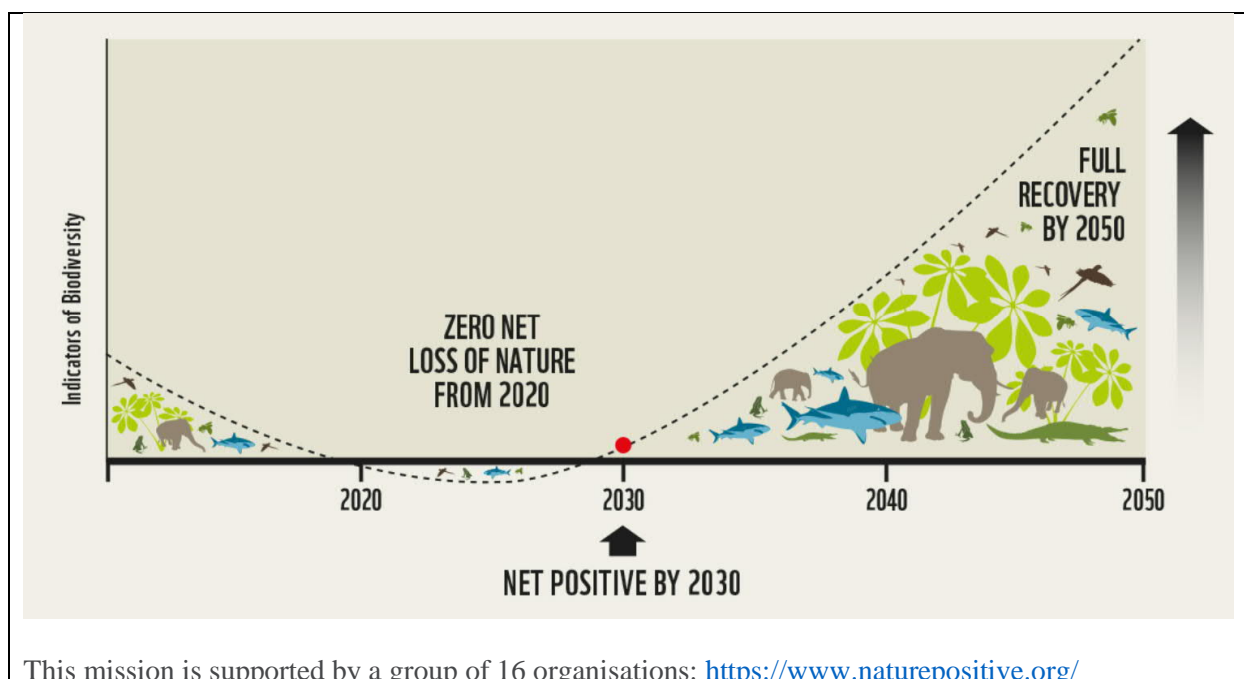
1.2	Current text	Suggested amendment
	<p>Section C – Theory of change</p> <p>5. The framework is built around a theory of change (see figure 1) which recognizes that urgent policy action globally, regionally and nationally is required to transform economic, social and financial models so that the trends that have exacerbated biodiversity loss will stabilize in the next 10 years (by 2030) and allow for the recovery of natural ecosystems in the following 20 years, with net improvements by 2050 to achieve the Convention’s vision of “living in harmony with nature by 2050”.</p>	<p>Section C – Theory of change</p> <p>5. The framework is built around a theory of change (see figure 1) which recognizes that urgent policy action globally, regionally and nationally is required to transform economic, social and financial models so that the trends that have exacerbated biodiversity loss will stabilize are reversed in the next 10 years (by 2030) and allow for the full recovery of natural ecosystems in the following 20 years with net improvements (by 2050) to achieve the Convention’s vision of “living in harmony with nature by 2050”.</p>
	<p><i>Justification: This section should be aligned with the mission and reflect the level of ambition of the vision. By 2050, nature must recover so that thriving ecosystems and nature-based solutions support future generations and the diversity of life, and play a critical role in halting climate change.</i></p>	

3.2	Current text	Suggested amendment
	<p>Section C – Theory of change</p>	<p>Section C – Theory of change</p>

<p>The theory of change for the framework acknowledges the need for appropriate recognition of gender equality, women’s empowerment, youth, gender-responsive approaches and the full and effective participation of indigenous peoples and local communities in the implementation of this framework. Further, it is built upon the recognition that its implementation will be done in partnership with many organizations at the global, national and local levels to leverage ways to build a momentum for success. It will be implemented taking a rights-based approach and recognizing the principle of intergenerational equity.</p>	<p>The theory of change for the framework acknowledges the need for appropriate recognition of gender equality, women’s empowerment, youth, gender-responsive approaches and the full and effective participation of indigenous peoples and local communities in the implementation of this framework. Further, it is built upon the recognition that its implementation willmust be done in partnership with many organizations at the global, national and local levels, with both private and public sectors and civil society, to leverage ways to build a momentum for success. It will be implemented taking a rights-based approach and recognizing the principle of intergenerational equity.</p>
<p><i>Justification: The theory of change should stress the role and responsibility of the private sector. Action is needed across society, linking private and public actions.</i></p>	

Proposed amendments to section C

1.1	Current text	Suggested amendment
	<p>Section C – 2030 Mission</p> <p>11. The 2030 Mission for this framework is:</p> <p>To take urgent action across society to put biodiversity on a path to recovery for the benefit of planet and people.</p>	<p>Section C – 2030 Mission</p> <p>11. The 2030 Mission for this framework is:</p> <p>To take urgent action across society to halt and reverse biodiversity loss by 2030 and put biodiversity on a path to recovery for the benefit of planet and people.</p>
<p><i>Justification: The current wording does not reflect the ambition level needed to achieve the 2050 vision to live in harmony with nature, and therefore needs to be strengthened. “On a path to recovery” does not give a clear goal. The science is clear that we have 10 years to address the loss of biodiversity and nature. That means that by 2030, we must have halted and reverse nature loss to be net-positive measured from a baseline of 2020: nature must start to recover, through improvements in the health, abundance, diversity and resilience of species, populations and ecosystems so that by 2050 we can achieve the CBD vision. The proposed mission in this amendment is aligned with the curve A from the SBSTTA document 24-03-Add2.</i></p> <p><i>A Global Goal for Nature: halt and reverse nature loss to be net-positive by 2030</i></p>		



Proposed amendments to section D

5.4	Current text	Suggested amendment
	<p>Section D – 2030 Milestones</p> <p>B.2. Nature is valued through green investments, ecosystem service valuation in national accounts, and public and private sector financial disclosures.</p>	<p>Section D – 2030 Milestones</p> <p>B.2. Nature is valued and embedded in decision-making, disclosure and market mechanisms across governments, businesses, financial institutions and civil society through green investments, ecosystem service valuation in national and business accounts, and public and private sector financial disclosures, and all investments.</p>
<p><i>Justification: A key element of transformation is to value and embed nature into all actors' decision-making. This milestone should reflect the four parts of society as identified by the CBD Long Term Approach on Mainstreaming (i.e., governments, businesses, financial institutions and civil society). "Green" investments seem limiting, especially now that mainstream financial institutions are recommending ESG investments as the default option.</i></p>		

Proposed amendments to section E

2.1	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 3. By 2030, ensure active management actions to enable wild species of fauna and flora recovery and conservation, and reduce human-wildlife conflict by [X%].</p>	<p>Section E – 2030 Action Targets</p> <p>Target 3. By 2030, ensure active management actions to increase the conservation and recovery of enable wild species of fauna and flora, and restoration of ecosystems and the ecosystem</p>

	services they provide by [X%], recovery and conservation, and reduce human-wildlife conflict by [X%].
<i>Justification: For effective engagement of business, it is essential to introduce the concepts of ecosystem services, nature's benefits to people, and the need for their conservation and restoration. Indeed, the mention of ecosystems restoration is a key factor to promote investment in sustainable landscape management.</i>	

2.2	Current text	Suggested amendment
	Section E – 2030 Action Targets Target 9. By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%].	Section E – 2030 Action Targets Target 9: By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%] transform food, land and ocean systems to ensure they meet people's needs within planetary boundaries, require value chain traceability and accountability, reduce food waste and post-harvest loss by 50%, and reduce the global footprint of diets by 50%.
<i>Justification: While managed ecosystems indeed need to support productivity, sustainability and resilience of biodiversity, this target needs to be further strengthened to refer to the main drivers of biodiversity loss. Indeed, land and sea use is identified as the main driver of biodiversity loss by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). This target is currently too weak, both in terms of ambition and comprehensiveness, to drive the required transformation towards sustainable food and agricultural systems. The proposed wording reflects the lessons learned from the Aichi Targets described in GBO-5.</i>		
<i>Focusing purely on reducing productivity gaps is too narrow. It misses the broader need to transform the food, land and ocean systems, across the value chain, in order to reduce the environmental footprints within planetary boundaries.</i>		

5.5	Current text	Suggested amendment
	Section E – 2030 Action Targets Target 13. By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into assessments of environmental impacts.	Section E – 2030 Action Targets Target 13. By 2030, integrate biodiversity values into policies, finance , regulations, planning, development processes, poverty reduction strategies and frameworks , accounts and metrics at all levels, ensuring that biodiversity values are mainstreamed across all ministries and sectors and integrated into financial planning and assessments of environmental impacts.

Justification: Finance and frameworks/metrics should be added to better reflect the transformation needed. Target 13 should promote a whole-of-government approach, that recognizes the importance of nature-based solutions and synergies between the various national and global policies and processes.

This would help avoid negative biodiversity impacts, contribute to positive impacts, unlock the full potential of nature-based solutions, and maximize synergies and policy coherence between different national and global policies and processes.

2.3	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 14. By 2030, achieve reduction of at least [50%] in negative impacts on biodiversity by ensuring production practices and supply chains are sustainable.</p>	<p>Section E – 2030 Action Targets</p> <p>Target 14. By 2030, achieve a reduction of at least [50%] in negative impacts on biodiversity from by ensuring production practices and supply chains are sustainable, including by developing and implementing national, regional and global action plans for all productive sectors and their national and trans-national supply chains to transition to a sustainable, just, and nature-positive economy that internalizes the value of biodiversity.</p>
<p><i>Justification: A target specifically focusing on productive sectors is essential to engage these sectors in the implementation of the Framework. The target 14 should therefore be strengthened, to promote just and nature-positive transitions in productive sectors. These plans should be developed in a collaborative way through a multi-stakeholder engagement led by governments and implemented collectively by all actors. They should be supported by the wider system of finance and incentives. To achieve the mission to reverse nature loss by 2030, unavoidable negative impacts from production will need to be compensated through restoration and additional protection.</i></p>		

2.4	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions.</p>	<p>Section E – 2030 Action Targets</p> <p>Target 15. By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions, including by adopting policies and measures to incentivize the demand for more sustainable products and services and stimulate the large-scale adoption of a circular economy.</p>

Justification: To ensure that change happens at the scale and speed needed, incentives, such as public procurement, are key to accelerate the transition effectively. Building the understanding and appreciation for the value of biodiversity through knowledge and education will not be enough.

6.1	Current text	Suggested amendment
	<p>Section E – 2030 Action Targets</p> <p>Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [X] reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.</p>	<p>Section E – 2030 Action Targets</p> <p>Target 17. By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including [full] reduction in the most direct and indirect subsidies and tax policies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.</p>
<p><i>Justification: This target is too weak. Eliminating harmful subsidies is an essential step in changing the rules of the game and in ensuring appropriate resource mobilization. That is why it is important for all harmful incentives and subsidies to be redirected towards sustainable use, resilience, restoration, and circularity. Target 17 should be strengthened to reflect the need to review, disclose, and entirely eliminate direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature. This is reflected in the commitments of the Leaders’ Pledge for Nature.</i></p> <p><i>For reference about the definition of harmful subsidies, please see this OECD report “Environmentally Harmful Subsidies – Policy issues and challenges”</i></p>		

4.1	Current text	Suggested amendment
	<p>[NEW]</p>	<p>Section E – 2030 Action Targets</p> <p>NEW Target: By 2025, strengthen or develop, and by 2030 implement regulatory measures for public and private financial institutions and businesses to:</p> <ol style="list-style-type: none"> a. Integrate biodiversity into business and financial decision-making and strategies, b. Support business in the development of standardized metrics to measure and value impacts and dependencies on biodiversity. c. Adopt disclosure requirements on biodiversity risks, impacts and opportunities.
<p><i>Justification: We will only see the transformation needed if financial flows are aligned with the CBD vision and mission. As this is a critical element of success and would also support resource mobilization, a specific target should be created to support alignment and application of frameworks and metrics to include biodiversity into decision-making.</i></p> <p><i>While the focus should be on improving decision-making, a standardized mechanism to assess and disclose nature-related risks and dependencies is required to ensure a level playing field and inform investors. Disclosure methodologies and metrics are currently still being developed, for example by the Taskforce on Nature-related Financial Disclosures (TNFD), however we anticipate they will have been tested and agreed before the proposed deadline.</i></p>		

8.1	Current text	Suggested amendment
	[NEW]	Section E – 2030 Action Targets [NEW] Target xx: Ensure the adoption and effective enforcement of environmental laws and standards, including by providing capacity development to countries worldwide.
<i>Justification: It is essential that CBD's goals are translated in national laws and regulations that are enforced, to ensure a global level playing field for business and therefore encourage business action for nature.</i>		

8.2	Current text	Suggested amendments
	[NEW]	Section E – 2030 Action Targets [NEW] Target xx: Establish an effective, comprehensive and cyclical implementation mechanism including the three following components: <ul style="list-style-type: none"> • by 2022, translate this framework and its targets into relevant national and regional planning processes, including strengthened NBSAPs; • by 2024, review the progress made in implementing this framework; • by 2026, ramp up the delivery of plans and actions at the national and regional level. This four-year cycle will repeat itself, with another review of progress by 2028 and another ramping up of plans and actions by 2030.
<i>Justification: Such an iterative process in the implementation of the Framework is essential to ensure that once Parties have collectively assessed how much progress they have made towards achieving the targets, they have the opportunity to ramp up the delivery of their biodiversity plans and commitments and to strengthen their national targets. This should be an opportunity for Parties to request additional technical and financial support to achieve their plans and commitments. Such a cycle would demonstrate to business leaders that policies to protect biodiversity will continue to increase and thereby incentivize companies to incorporate ever more stringent nature protection policies into their long-term strategy.</i>		

Proposed amendments to section F

6.2	Current text	Suggested amendment
	Section F – Implementation support mechanisms Article 13 – a (ii) Reducing or redirecting resources causing harm to biodiversity;	Section F – Implementation support mechanisms Article 13 - a (ii) A systemic change in subsidies and incentives Reducing to eliminate or redirecting

	<p>resources those causing harm to biodiversity and redirect them to incentivize practices that support sustainable use, resilience, restoration and circularity, as well as the integration of nature and nature-based solutions into public and private procurement policies and infrastructure development guidelines and promotion of net gain requirements with adherence to the mitigation hierarchy for all major development sectors.</p>
<p><i>Justification: Eliminating harmful subsidies is an essential step to change the rules of the game and ensure appropriate resource mobilization. That is why it is important for these incentives and subsidies to be redirected towards sustainable use, resilience, restoration, and circularity. The Framework should reflect the need to review, disclose, and entirely eliminate direct and indirect subsidies and tax policies that incentivize the degradation and over-exploitation of nature. This is reflected in the commitments of the Leaders' Pledge for Nature.</i></p>	

7.1	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 - a (iii) Generating additional financial and non-financial resources from all sources, including from international and domestic sources and the public and private sectors;</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 - a (iii) Generating additional financial and non-financial resources from all sources, including from international and domestic sources and the public and private sectors, including the promotion and implementation of innovative financial solutions such as green financing, large public funds, and blended finance schemes to finance nature, including small and large-scale nature-based solutions, and support efforts on greening the financial system.</p>
<p><i>Justification: The Post-2020 Framework needs to help unlock the innovative, transformative power of the full financial sector. It is therefore important that the role of innovative and new finance be recognized, and that actors from this sector are called on to contribute.</i></p>		

7.2	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – a Mobilizing sufficient resources</p> <p>(iv) Enhancing the effectiveness and efficiency of resource use;</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 – a Mobilizing sufficient resources</p> <p>(iv) Enhancing the effectiveness and efficiency of resource use, including the adoption of mechanisms and quantifiable indicators to value ecosystem services delivery and</p>

	reward sustainable natural resources management.
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4.2	Current text	Suggested amendment
	Section F – Implementation support mechanisms Article 13 – b Capacity development [NEW]	Section F – Implementation support mechanisms Article 13 – b Capacity development [NEW] (iv) Supporting and requiring business to internalize environmental externalities and integrate their impact and dependencies on nature in decision-making, risk management, supply chain management and external disclosure. This will require: a) standardizing metrics, tools and guidance to undertake robust corporate natural capital assessments and accounting; b) promoting guidance on nature-related financial disclosures; and c) providing contextual natural capital data from national statistical systems.
<p><i>Justification: Identifying, measuring, valuing and externally disclosing impacts and dependencies on nature is relatively new for most businesses. Therefore, capacity development and standardized metrics, tools and guidance have to be provided at the same time as requiring businesses to internalize environmental externalities in decision-making and disclosure.</i></p> <p><i>Parties could support the development and implementation of a Task Force on Nature-related financial disclosure (TNFD) and its linkage to the existing TCFD. Indeed, a commonly accepted way to report nature related risks and dependencies is required to support the inclusion of biodiversity in financial decision-making and investment, as with the TCFD on climate. Such an exercise needs to be parallel or linked to existing TCFD efforts.</i></p>		

4.3	Current text	Suggested amendment
	Section F – Implementation support mechanisms Article 13 – b Capacity development [NEW]	Section F – Implementation support mechanisms Article 13 – b Capacity development [NEW] (vi) Supporting and training the appropriate government organizations to implement the updated System of Environmental - Economic Accounting (SEEA-EA), with the aim to mainstream biodiversity into government accounting and use this as a basis to provide economy-related data on biodiversity to business.

<p><i>Justification: Valuing and embedding nature in decision-making and disclosure is one of the key challenges that both the public and private sectors face. Governments can lead by example by implementing the agreed statistical framework for natural capital accounting. They can also further promote this approach to private actors by enabling them to use the improved statistical data on nature in relation to economic activities, and through this provide context for decision useful information.</i></p>	

8.3	Current text	Suggested amendment
	<p>Section F – Implementation support mechanisms</p> <p>Article 13 (e)</p> <p>[NEW]</p>	<p>Section F – Implementation support mechanisms</p> <p>Article 13 (e)</p> <p>NEW - a ratchet mechanism informed by science to ensure that the 2050 vision and 2030 mission are achieved.</p>
<p><i>Justification: a simple and cyclical ratcheting process should be introduced, so that Parties ramp up the delivery of their biodiversity plans and commitments and strengthen their national targets if needed. Such a cycle would demonstrate to business leaders that policies to protect biodiversity will continue to increase and thereby incentivize companies to incorporate ever more stringent nature protection policies into their long-term strategy.</i></p>		

Proposed amendments to section G

3.3	Current text	Suggested amendment
	<p>Section G – Enabling conditions</p> <p>14 - (b) The participation of all relevant stakeholders, non-governmental organizations, youth, civil society, local and subnational authorities, the private sector, academia and scientific institutions through a whole-of-society approach and through inclusive and representative multi-stakeholder and multisectoral platforms;</p>	<p>Section G – Enabling conditions</p> <p>14 - (b) The participation of all relevant stakeholders, non-governmental organizations, youth, civil society, local and subnational authorities, the private sector, academia and scientific institutions through a whole-of-society approach that integrates business plans and commitments on nature in national commitments, and through inclusive and representative multi-stakeholder and multisectoral platforms;</p>
<p><i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. To empower businesses to act at the necessary scale and urgency, the Framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans. For that, national strategies and commitments should include business plans and commitments as part of a joint public-private approach to reverse nature loss.</i></p>		

3.4	Current text	Suggested amendment
	<p>Section G – Enabling conditions</p>	<p>Section G – Enabling conditions</p>

[NEW]	14 - [NEW] The implementation of landscape and seascape, as well as jurisdictional approaches, including through the promotion of supply-chain and/or sectoral collaboration mechanisms and multi-sectoral, multi-stakeholder platforms;
<i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. Governments play an important role in empowering society to collaborate and act for nature. Traditional models of conservation have failed to enable countries to reach the Aichi targets, and it is therefore crucial to implement innovative collaboration models for the protection, restoration and sustainable use of natural resources.</i>	

Proposed amendments to section H

3.5	Current text	Suggested amendment
Section H – Responsibility and transparency	Section H – Responsibility and transparency	Section H – Responsibility and transparency
17. a. Planning:	17. a. Planning:	17. a. Planning:
[NEW]	i. [NEW] - Should include non-State actors' plans and commitments.	
<i>Justification: Transformative change requires that all public, private and civil society actors work together to deliver on commitments for nature and to implement solutions. To empower businesses to act at the necessary scale and urgency, the Framework should promote multi-stakeholder and multi-sectoral platforms and joint action plans. National strategies and commitments should include business plans and commitments as part of a joint public-private approach to reverse nature loss.</i>		

9.1	Current text	Suggested amendment
Section H – Responsibility and transparency	Section H – Responsibility and transparency	Section H – Responsibility and transparency
16. This system minimizes the burden on Parties, the Secretariat and other entities. It is aligned with, and where appropriate integrated with other processes and other relevant multilateral conventions including Agenda 2030 and the Sustainable Development Goals.	16. This system minimizes the burden on Parties, the Secretariat and other entities. It is aligned with, and where appropriate integrated with other processes and other relevant multilateral conventions including Agenda 2030 and the Sustainable Development Goals and developed in an integrated way with the UNFCCC Nationally Determined Contributions (NDCs) to recognize their synergies, co-benefits and trade-offs.	
<i>Justification: There is a mutual interdependence of solving the interconnected crises of climate change, nature loss and social inequality so they must be tackled together to achieve a just transition. While the Post-2020 Framework needs to be linked to all relevant Multilateral Environmental Agreements (MEAs), the integration with UNFCCC and the NDCs is essential to deliver climate/nature/people synergies and is key to ensuring coherent and effective action plans that receive buy in from a range of stakeholders. Companies are increasingly reporting and aligning activities with the SDGs, so referencing the relevant SDGs would also be welcomed.</i>		

