



SBSTTA-26 and SBI -4 Statement Compilation

Item-3 Statement on Monitoring - May 13 2024

Thank you Chair,

I am speaking on behalf of the CBD Alliance.

A comprehensive, adequate monitoring framework is of utmost importance to ensure proper reporting of GBF implementation. We appreciate all the hard work done so far, but the current draft has severe flaws and gaps.

The proposed indicators for targets 3, 10, 12, 15, and 16 are fundamentally inadequate and will undermine the GBF: The target 3 and 12 indicators ignore all qualitative elements, and target 10 refers to certification systems that certify tree monocultures as if they were forest ecosystems and includes no indicators on fisheries. Also, a component indicator for target 18.1 proposes to measure the monetary value of biodiversity offsets as positive incentives for biodiversity conservation and sustainable use, but such biodiversity offsets have proven to be problematic for biodiversity protection and promote business as usual ecosystem destruction. We suggest its deletion.

Meanwhile, the target 15 indicator refers to fundamentally flawed corporate-driven initiatives like the TNFD involving voluntarily reporting by investors on biodiversity risks that harm their own financial interests, while neglecting to report on, and address, negative impacts that harm biodiversity.

While it is important to move forward and adopt the indicators proposed by the AHTEG and expert groups on Monitoring, it is equally important to fill the gaps to rectify the shortcomings mentioned above and identified by the AHTEG on monitoring, and come to a clear agreement on a process how to do this in a fair, inclusive, transparent and clear process leading up to COP 17.

Some examples from our CBDA factsheet for issues that need to be addressed :

- The indicator on target 3 neither tells us if the protected areas actually deliver conservation outcomes nor does it let us know if human rights have been respected in the site designation and management process

- The proposed Aggregated Total Applied Toxicity (ATAT) methodology for headline indicator 7.2 is an appropriate and practical measure of the overall risk of pesticides to biodiversity and should be endorsed. Additionally, reinstating the Target 7b complementary indicator on Highly Hazardous Pesticides will help Parties with Indicator 10.2 and ensure GBF implementation complements the delivery of Target A7 of the Global Framework on Chemicals. The indicator on plastic waste, however, is still missing.
- The CBDA urges Parties to adopt a headline indicator for target 23, developing an ambitious reporting methodology fully aligned with the Gender Plan of Action (GPA), to monitor progress and ensure gender equality as well as gender-responsive GBF implementation that provides all women and girls with equal opportunities and capacity to contribute to the Convention's objectives.

Further examples are listed in Annex III to draft recommendation SBSTTA 26/2 and the CBDA factsheet which is posted on our website. There needs to be a comprehensive process to address these gaps and flaws by COP 17.

Thank you Chair.

Item 8 (b) of the agenda Conservation and Sustainable use of Marine and coastal biodiversity - May 15 2024

Statement from CBDA Alliance

Thank you Madame Chair,

I speak on behalf of the CBD Alliance.

Over 40 projects and experiments of marine geoengineering techniques are currently proposed or ongoing in many regions of the world. These could have serious and long-lasting impacts on marine and coastal biodiversity and on related communities and livelihoods. Many of them are self-named "blue carbon" projects.

The London Convention and London Protocol on the Prevention of Marine Pollution by Dumping of Wastes and Other Matters are very concerned over these projects and are therefore currently discussing the main marine geoengineering techniques.

CBD need to recall and implement its precautionary decisions on ocean fertilization and geoengineering, that covers also marine geoengineering.

The CBD Alliance suggests to insert the following texts, in document CBD/SBSTTA/26/7, section 8 (b)

Under section VI. Recommendations

In the paragraph on recalling prior decisions, insert recalling decisions XI/16. C on ocean fertilization, decision X/33 (w) and decision XI/20 (9) on biodiversity and climate change, as they cover also marine proposals.

On the paragraph on “Welcoming also the collaborative efforts” with other UN organizations,

Insert “the London Convention / London Protocol on the Prevention of Marine Pollution by Dumping of Wastes and Other Matters”

In point 5 on this paragraph, add

5 (bis) Welcomes the ongoing work of the London Convention / London Protocol on the Prevention of Marine Pollution by Dumping of Wastes and Other Matters on marine geoenvironmental techniques that could have impacts on marine biodiversity

5 (ter) Reaffirm decision X/33 (w) and (x) on biodiversity and climate change and urges Parties and invites other governments to implement this decision and report on actions taken related to this decision to the Executive Secretary

Under point 6 on Requests to the Executive Secretary:

Insert a new paragraph

(a) bis Report the results of ongoing work of the London Convention / London Protocol on the Prevention of Marine Pollution by Dumping of Wastes and Other Matters on marine geoenvironmental techniques for its consideration at COP 16

SBSTTA 26 Item 9- Biodiversity and Health - May 15, 2024

Thank you Chair

I am from the Third World Network, speaking on behalf of the CBD Alliance.

We have two concerns with this agenda item.

Firstly, the draft Global Action Plan does not satisfy the mandate of decision 15/29, which in Paragraph 5.a. asked for revisions to address issues of equity and fair and equitable benefit sharing. We recall that SBSTTA-24 asked for the revised Plan because the initial draft did not take into account socio-economic inequalities and health inequities existing between developed and developing countries, as well as the importance of access and benefit sharing systems in biodiversity and health interlinkages. We are concerned that these gaps remain unaddressed.

We are also concerned that the draft global action plan refers to IPCC and IPBES reports but doesn't reflect their call for new and additional resources for developing countries. Similarly no concrete measures are suggested in the action area relating to access and benefit sharing under Annex 1.

Further, the understanding of the One Health Approach advocated by the Global Action Plan is skewed towards expanding the scope of surveillance. It's not clear what are the equitable interventions one must undertake, once problems are identified through surveillance.

Secondly, the Global Action Plan and its contents are interlinked to the ongoing negotiations at the WHO for a pandemic treaty and this has two implications. First, the action plan could legitimize several contested concepts and provisions under discussion at WHO, including One Health and wildlife surveillance. Second, the Pandemic Treaty has proposals that could convert this voluntary action plan under the CBD into de facto obligations.

Therefore we call upon Parties to postpone discussions on this agenda item to the next SBSTTA where we will have more information about the ongoing negotiations in WHO and its results.

If discussions are not deferred, we propose the following:

- In paragraph 1, change “Adopts” to “Takes note of”
- In paragraph 4, after as appropriate, add: “respecting self-determined national priorities”
- In paragraph 6, after capacity-building, add “in developing countries”, and after implementation, add “of actions addressing biodiversity and health interlinkages at the national level”
- In paragraph 8b, after Parties, add “upon request”

We have more text suggestions for Annexes I and II and will submit these in writing.

Thank you Chair

SBI-4

CBDA Opening Statement Item 1.1 - May 21 2024

Thank you, Chair.

I'm from the Third World Network, speaking on behalf of the CBD Alliance.

We want to see successful implementation of the CBD with its 3 objectives, through the relevant GBF commitments. We have some concerns, and some suggestions.

We are concerned to see implementation of the following elements being pushed through:

- False corporate-led voluntary solutions to the massive funding for biodiversity destruction, both through investment in destructive activities, such as agro-commodities development, infrastructure, bioenergy and mining, and through harmful subsidies.
- The reliance on private sector finance, which is profit-oriented, and often not oriented to the real needs of biodiversity and peoples.
- Market-based instruments, such as biodiversity offsets and credits, which imply that biodiversity destruction becomes a source of funding, in many cases even the only available one.
- The lack of regulation and scrutiny over corporate wrongdoings. Instead of holding corporations to account, weak self-reporting and voluntary initiatives that do not change biodiversity-destructive patterns are promoted

However, we are convinced that if the following elements are prioritised, we can turn things around:

- Supporting the efforts of indigenous peoples, local communities, women and youth, particularly ensuring that their rights are respected at all times.

The human rights based approach, which is in section C of the GBF should be central in the targets, indicators, and implementation tools.

Providing the means of implementation, in accordance with the principles of equity and common but differentiated responsibilities. The burden of implementation lies more heavily on developing countries, and developed countries must provide the financial resources, as they bear greater responsibility in view of the disproportionate pressures their societies have placed and continue to place on the global environment, and of the technologies and financial resources they command.

- The application of the precautionary principle, particularly with regard to the transfer of technologies, which have to be appropriate and not cause damage to the environment and peoples, and for capacity building for technology assessment.

- Concrete commitments by Parties to develop regulatory frameworks particularly to regulate those sectors with a high impact on biodiversity, for quantified and binding commitments to redirect perverse incentives, and to ensure that other financial flows are aligned to biodiversity objectives.

We call on Parties to ensure that implementation goes beyond lip service, and that their NBSAPs take the above into consideration, through transparent and participatory processes.

Thank you, Chair.

Item 3 - NBSAP

May 21 2024

Thank you Mr. Chairperson for allowing me to briefly address this meeting on behalf of the CBD Alliance.

We share the concerns mentioned in document SBI/4/2 about National Biodiversity Strategies and Action Plans that are not aligned with the strategic plans of the CBD. Proper alignment requires, first and foremost, that not only all policies and activities but also all financial flows are aligned with the GBF. It is simply unacceptable that banks and other private institutions continue to invest annually more than 5 trillion USD in sectors and projects that harm biodiversity, and that Parties themselves continue to provide 1.7 trillion in harmful subsidies and other perverse incentives.

To mention just one example, European countries spent more than 15 billion Euro on subsidies for bioenergy production last year, despite a rapidly growing body of scientific evidence that bioenergy production is not only a key cause of deforestation and forest degradation in both Europe itself and forests in other continents, but also emits more greenhouse gasses per unit of energy produced than even coal. With the deadline for identifying and phasing out the most harmful incentives approaching fast, it is essential that updated NBSAPs include concrete commitments to redirect such perverse incentives to gender just, socially equitable real solutions for the biodiversity and the climate crises. Similarly, concrete commitments should be included to set up the necessary regulatory frameworks that ensure private finance no longer forms the main driver of biodiversity loss. And in line with the CBD and the GBF we need concrete quantified binding targets for providing new and additional public financial support to developing countries to be included in NBSAPs.

We thus call on Parties to include the following text suggestion in their draft recommendation: "Calls on Parties to include strong regulatory frameworks and quantified binding commitments, including in the field of mobilizing resources and redirecting perverse incentives in their updated National Biodiversity Strategies and Action Plans, so as to align all policies and financial flows with the Global Biodiversity Framework."

We would welcome Party support for this text proposal.

Thank you

CBD Alliance statement, Item 4: Resource Mobilization (Final version)

May 22 2024

Thank you, chair. I'm from the Third World Network, speaking on behalf of the CBD Alliance.

The issue of resource mobilization is critical to the implementation of the Convention and the GBF. Biodiversity loss continues apace, as financial resources are not provided, or used to destroy rather than conserve biodiversity, structural root causes are not addressed and there is misplaced hope on the private sector and markets.

There needs to be equity, as for far too long, obligations under Article 20 have not been met. We stand with developing countries, where most of the world's biodiversity lies, that are calling for a dedicated Global Biodiversity Fund under the authority of the COP to be established; one with equitable governance and directly accessible and responsive to their needs, and also to the needs of indigenous peoples, local communities, women and youth – those who are the best stewards of biodiversity.

In this regard, financial and political support should be scaled up for collective actions, Mother Earth centric actions, and non-market-based approaches in accordance with Target 19(f).

At the same time, our message is clear: Stop financing biodiversity harmful activities! Trillions are going into harmful subsidies and incentives for harmful sectors like industrial livestock farming and bioenergy, while the private sector invests \$5 trillion annually in destroying nature. Corporate-led, voluntary approaches like the Taskforce on Nature-related Financial Disclosures undermine the GBF; references to such approaches in the text should be removed, as suggested by Egypt. Strong regulatory frameworks and binding commitments to redirect incentives should be included in NBSAPs.

The international financial and monetary system further pushes developing countries to support extractive activities that drive biodiversity loss, in order to maintain financial stability, attract investment and obtain foreign currency, often to service external debt.

We thus need to urgently address structural constraints on developing countries – by ensuring debt and tax justice. Countries in debt distress spend more on servicing debt than on education or health, let alone biodiversity protection.

But debt-for-nature swaps have limited impact on debt levels, paying only 0.11% of total debt of low and middle-income countries over three decades. Their environmental and social impact is also questionable, and it is unethical to see debt distress as an “opportunity” for conservation.

Private and blended finance, and market-based mechanisms not only fail to generate the resources or biodiversity outcomes required, but have adverse impacts on indigenous peoples, women and local communities, including violations of their rights. The same concerns arise with the revived interest in biodiversity offsets and credits.

Item 8 -

May 24 2024

Thank you, Chair. I'm from the Third World Network, speaking on behalf of the CBD Alliance.

We believe that the 'Procedure for avoiding or managing conflicts of interest in expert groups' is an important step towards ensuring the integrity and credibility of the processes and outcomes of the Convention.

In this regard, we have a number of suggestions for improvement of the procedure.

Firstly, we welcome the proposed updates and recommendations to the current procedure, based on the implementation of the procedure to date, as well as relevant developments in avoiding or managing conflicts of interest in other processes and organisations, for consideration by COP 16.

However, beyond this, further improvements to the current procedure are not envisaged. It is important that the procedure is periodically reported on, reviewed and improved based on further experiences and lessons learnt in the Convention processes, as well as further developments in other fora.

Secondly, in the current procedure, there is no express provision on what to do when nominations for membership to an expert group are not accompanied by a completed interest disclosure form as required. There is also no established mechanism for verifying whether or not disclosures are complete or accurate. The assumption is that each expert will complete their interest disclosure forms in good faith and as accurately as possible.

This is insufficient, and reasonable due diligence should be applied by the Secretariat in order to verify if the expert has accurately declared information that may indicate any potential conflicts of interest.

In this regard, we therefore propose a new paragraph 1 bis –

Decides to periodically review the procedure for avoiding or managing conflicts of interest in expert groups and if necessary, propose updates and amendments to the current procedure for consideration by the Subsidiary Body on Implementation for adoption by the Conference of the Parties;

And at the end of paragraph 2 to add –

Check the accuracy of the interest disclosure forms submitted by nominated experts.

We have further proposals to strengthen the procedure which we will submit in writing.

Thank you, Chair

Text proposals

Paragraph 1 (a)

1. Approves the following amendments to the interest disclosure form contained in the annex to the Procedure for avoiding or managing conflicts of interest in expert groups, as follows:

(a) In the declaration section at the end of the form, the following text is inserted: “If selected as a member of the expert group, I undertake to carry out my duties and responsibilities with full objectivity and in the event that a potential conflict of interest is established, I undertake to recuse myself from relevant discussions and/or decision-making, and from participating in the matter concerned in any other manner, as appropriate, and as determined by the Chair of the expert group in consultation with the Secretariat;

1.bis Decides to periodically review the procedure for avoiding or managing conflicts of interest in expert groups and if necessary, propose updates and amendments to the current procedure for consideration by the Subsidiary Body on Implementation for adoption by the Conference of the Parties;

2. Requests the Executive Secretary to integrate the amendments referred to in paragraph 1 above and to take measures to enhance the application of the Procedure, in consultation with the Bureau of the Subsidiary Body on Scientific, Technical and Technological Advice or the Conference of the Parties, as appropriate:

(a) Check the accuracy of the interest disclosure forms submitted by nominated experts;

(b) At the start of any meetings of any expert group, disclose any significant interests of a particular member that was included on the basis of paragraph 4.4 of the procedure, to other members of the expert group.

2.bis Further requests the Executive Secretary to publish a summary of all declarations and actions taken to manage any potential conflicts of interests in resulting reports and work products of an expert group.

CBD Alliance statement on Agenda Item 12, Multi-year Programme of Work of the COP

May 26 2024

Thank you Mr. Chair for allowing me to speak on behalf of the CBD Alliance.

We welcome many of the proposals in document SBI4/15, including in particular the proposal to include tools and guidance to support the implementation of the GBF in the field of equity and the human rights-based approach to the conservation and sustainable use of biodiversity on the agenda COP-17. This is critical for the implementation of a gender just, rights-based, socially equitable approach to biodiversity conservation and sustainable use that is enshrined in the GBF. We urge the SBI to support this proposal.

We support the concerns expressed during SBSTTA about the term "bioeconomy". As demonstrated by the growing body of scientific evidence about the devastating impacts of large-scale biomass use for energy production on both biodiversity and the climate itself, adding the term "bio" to business as usual does not always lead to outcomes that are actually biodiversity-friendly - rather the contrary. Therefore, we support the recommendation of the SBSTTA to focus the discussion on the scientific knowledge gap on if and how sustainable biodiversity-based activities, products and services can enhance biodiversity.

In the consideration for the follow up to the Framework at COP-18, it is important that a review of the effectiveness of measures taken to implement the GBF is undertaken.

Finally, there are some critical issues in the KMGBF that are not adequately addressed by current CBD work programmes and should be prioritized. This includes reducing the global footprint of consumption in an equitable manner by 2030, and addressing the important link between biodiversity and sustainable livelihoods, in the context of nature's contribution to people.

Concretely, we would request Parties:

Regarding COP 17:

- to retain proposed item (d) iv on "equity and the human rights-based approach..."
- to amend the following text for item (d) iii "Sustainable biodiversity-based activities, products and services that enhance biodiversity"
- to add the following items:
 - (e) Fair and sustainable resource use and consumption patterns
 - (f) The relationship between biodiversity and sustainable livelihoods

Regarding COP 18:

- to add at the of (g): including a review of the effectiveness of measures to implement the goals and targets of the KMGBF in line with the principles and objectives of the Convention.

We welcome Party support for these proposals. Thank you.
