



CBD Alliance
SBI 3 online sessions, March 2021

Agenda item 11. Mainstreaming of biodiversity within and across sectors and other strategic actions to enhance implementation

Madam/Mr Chair

This intervention is delivered on behalf of the CBD Alliance and gathers a diverse range of views and proposals from civil society.

Mainstreaming, that is, ensuring that we rapidly and significantly reduce the adverse impact of all sectors on biodiversity, should certainly be central to any post-2020 CBD implementation. However, mainstreaming has until now been discussed in small working groups. This must now end. Parties should take up the process, not allow it to continue in parallel.

The main actors in the mainstreaming action plan should be governments, and the main actions should be regulatory measures. Coordinating this is exactly the role of the CBD as a multilateral organisation that brings governments together. We need stronger governance structures, implementation of regulation, sanctions in cases of infractions, and international coordination to make this happen.

We are therefore very concerned about the overall focus on **strengthening business platforms, and multi-stakeholder processes**. These institutionalise the role of corporations alongside government, civil society, academia etc, as if corporations were institutions with a genuine interest in planetary and human wellbeing, whereas their main focus is actually on increased profits. The real Rights-holders, IPLCs, who live in, dynamically manage and protect nature have little power in these settings.

Indigenous Peoples, local communities, women, smallholder farmers and producers understand best how to nurture local biodiversity; they must be heard and their advice followed. Deliberative democracy and rights to the sustainable use of biodiversity must take precedence over commercial control of lands, waters and forests.

We believe that the real power of the CBD lies in strategic area 1, on government and its policies. Yet regulation receives only a few indirect mentions. Governments must **regulate** all sectors, especially the business and finance sectors at national and international level, taking a **whole of government** approach in the interests of biodiversity and society, ensuring we don't exceed planetary boundaries.

Governments must **regulate** for the removal of **perverse incentives**¹ with negative impacts on biodiversity, calculated at 4-6 trillion dollars a year. Redirecting these could release vital funding for biodiversity, including agricultural biodiversity. **Divesting from harmful sectors** is crucial and the financial sector must be regulated.

The hypothesis that valuing nature in national accounting systems contributes to reducing biodiversity loss remains unproven.

The term **Nature-based solutions** should be deleted: it's not CBD language. It can mean almost anything, from developing gene drive organisms to maintaining primary forests. The focus on NBS being a "climate solution" could lead to biodiversity being used for offsetting climate emissions under the UNFCCC.

Strategy area 2 focusses on actions for businesses, over which the CBD has no control. The overall aim of "mainstreaming biodiversity in all sectors" must be to reduce significantly the overall impact of these sectors. We cannot expect business to self-regulate and stop their growth. Actions proposed in this section are mostly voluntary, with companies claiming that self-certification is a viable alternative to governmental regulation, without any governmental assessment or verification.

The mainstreaming process, as currently dominated by business and finance, risks helping those sectors avoid the urgent change we require. Corporate capture of policy-making, including through mechanisms like the Informal Advisory Group, is the main obstacle to change.

Much of the action plan is based on **offsetting mechanisms**, and the idea of "no net loss" or "net positive", while avoidance – not having the destructive project in the first place - is rarely an option.

Regarding Strategy area 3, consumers cannot be expected to change their behaviour, while inequalities grows, and sustainable food and other products are inaccessible to much of the global urban population. Yet industrial producers are still allowed to externalize environmental costs, and corporations continue to market unhealthy, unsustainable food and other products.

This section also reveals the serious **imbalance in power** between society and business and finance in the document.

A mid term **review** must be based on scientific studies of the real impacts of measures in the mainstreaming action plan, on reducing biodiversity destruction, and upholding the rights of IPLCs.

Thank you.

¹[The economics of biodiversity: The Dasgupta report](#)