

Statement on general structure of the GBF

The structure of the GBF defines the whole outcome and we are worried only now is the first time we have the chance to discuss and provide inputs to it.

The coherence of the structure needs to be improved in the following aspects

1. It lacks clear linkages between the milestones, targets and goals because there is no clarity about the assumptions underlying the current GBF structure and this needs to be rectified, especially since the GBF is meant to be based on the Theory of Change, where the questioning of assumptions should be basic to the whole exercise
2. It fails to provide balanced means of implementing the Convention.
3. a general lack of balance between the three objectives of the CBD
4. the protocols are hugely side-lined, without clear support for their continuation and implementation.
5. the GBF is not oriented at implementing the key provisions of the convention¹, but rather risks replacing or undermining several CBD articles.

One of such assumptions is that it is fine for the environment to “keep getting worse for a little while, and then get better”. This type of thinking has kept us on a downhill path since decades.

Root causes of biodiversity loss need to be addressed, throughout the text, with every mechanism, and should honor states' obligations to regulate processes and activities that deepen and perpetuate environmental damage. Unfortunately, instead, the GBF proposes voluntary measures.

The GBF is not based on what we **need to do** for biodiversity -there is not even a mention of the planetary boundaries- and rather starts from what is **feasible to do**, clearly avoiding hurting the economy. Hence the whole GBF is constructed NOT to challenge economic growth and overconsumption and therefore it can only lead to biodiversity destruction.

A core issue is the fact that the GBF separates people from biodiversity, while people are part of biodiversity and interactive with it.

The current GBF should be improved by including the following:

- a) a strong statement of principles, such as equity and common but differentiated responsibilities
- b) A mechanism for noncompliance including penalties which should be well embedded under the principle of CBDR.
- c) A target on Human Rights and environmental defenders, and on women, as they are the ones who really defend biodiversity in the real world.
- d) A target on Outlawing major disturbances of nature

¹ Particularly CBD articles 3, 4 (b), 7 (c), 8 (l), 14.1 (d) and 14.2