**Template for the Advanced Comments on Draft Documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation**

**TEMPLATE FOR COMMENTS: Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in CBD/SBI/3/11/ADD 6**

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| **Advanced comments on the draft documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation** | |
| **Scope of this template for comments** | Draft guidance for capturing commitments from actors other than national governments in the context of enhanced planning, monitoring, reporting and reviewing mechanisms contained in the document CBD/SBI/3/11/Add.6, which includes a draft of Annex B to CBD/SBI/3/CRP.5. This template aims to collect feedback on that Annex. |
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| **Comments** | |
| In line with Brazil’s comments to other documents from SBI Item 9 under peer review, commitments from other actors other than national governments must be communicated directly to CBD National Focal Points or relevant national authorities, with a view to supporting the revision and update of NBSAPs, rather than being submitted separately from NBSAPs and/or national targets.  In addition, many elements within document **CBD/SBI/3/11/Add.6**, such as the references to global gap report or “aggregate level of ambition”, prejudge the outcomes of ongoing discussions under the Convention and therefore should be deleted. Brazil would like to further emphasize that the expression “ambitions” as metrics for evaluating implementation lends itself to ambiguity as it suggests that improvements in the implementation would rely solely on individual efforts, thus neglecting the critical role that international cooperation will play to enable the implementation of the framework in developing countries.    As NBSAPs shall remain the primary instrument for the implementation of the Convention, additional modalities for the implementation of CBD, such as the submission of commitments from non-state actors, should aim at enhancing and complementing national governments’ efforts. Therefore, discussions to engage IPLCs and all relevant stakeholders in the implementation of the Convention and the Post-2020 GBF should focus mainly on improving the inclusivity and transparency of the preparatory work for revising/updating NBSAPs, instead of establishing an alternative formal track by which countries may be unable to assess the consistency of other actors’ efforts with government actions.  Regarding paragraph 9 (b) and (e), Brazil requests deleting references to coalitions and initiatives that have not been established through multilateral processes. Cooperation between the Convention and multi-stakeholder initiatives (e.g. Science-Based Targets Initiative (SBTi), the Task Force on Nature-related Financial Disclosures (TNFD)) should be assessed on a case-by-case basis and should be based on clear terms of reference to be discussed and agreed upon by Parties to the Convention.  Regarding paragraph 9(c), Brazil believes that the one-year timeframe for the submission of commitments will be challenging for developing countries, as it will require substantial consultations amongst stakeholders at the national level to ensure the effective participation of all those wishing to contribute to the implementation of the Post-2020 GBF at the national level.  Regarding paragraph 10, Brazil requests further clarification regarding the alleged “guidelines and templates for reporting and verifying commitments that are being developed by the coalitions of actors other than national Governments in collaboration with the Secretariat in order to both meet the needs of particular coalitions”. **As the negotiations of the Post-2020 GBF are a Party-driven process, Brazil would like to recall that any guidelines/templates or documents that will underpin reporting or review exercises shall be discussed and agreed upon by Parties, in order to ensure the inclusivity, transparency and legitimacy of the Convention processes.** It should also be noted that a number of coalitions and initiatives referred to within document **CBD/SBI/3/11/Add.6** lack the adequate participation of developing countries and engage only a limited number of countries and regions. | |

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| **Section** | **Comment** |
| 2 | As highlighted by comments from Brazil to other documents under “peer review”, the annexes have placed a disproportionate emphasis on the need to assess progress towards goals and targets following the adoption of the Post-2020 GBF and **have neglected the equally pressing need to assess and improve compliance with existing obligations enshrined in the Convention itself over time**.  That being said, Brazil believes this section still requires significant improvement.  Firstly, any commitment from non-state actors should indicate to what extent the proposed commitments are consistent with NSBAPs from their country of origin and to what extent they will contribute to the implementation of the relevant NBSAP and/or the achievement of national targets.  Secondly, any commitment from non-state actors should indicate the type of action being implemented (conservation, sustainable use, ABS or cross-cutting) and how it ensures that the actions being put forth are supportive of existing national policies on conservation, sustainable use and/or ABS.  In the case of actions to be implemented in developing countries by the private sector, actors from the private sector must report on efforts to accelerate, encourage and enable innovation, including research, development and deployment efforts, and collaborative approaches to research and development for the conservation and sustainable use of biodiversity; efforts to encourage activities related to technology development and transfer, including development and enhancement of endogenous capacities and technologies of developing country Parties that are relevant to the objectives of the Convention; efforts to ensure compliance with national legislation for the implementation of the Convention, including provisions on the fair and equitable sharing of benefits arising out of the utilization of genetic resources and associated traditional knowledge. |
| 3 | With a view to ensuring transparency, Brazil believes further information is needed regarding how the Key performance indicators (KPIs) are to be developed and/or identified.  In addition, efforts to implement monitoring and reporting must be fully consistent with existing multilaterally-agreed upon initiatives, in particularly those under the Global indicator framework for the Sustainable Development Goals, as agreed upon by UNGA Resolution **A/RES/71/313**, preventing undue burden. Regarding efforts from the private sector, modalities for monitoring and reporting must build on the implementation of SDG 12.6.1, on sustainability reports, thus taking advantage of the extensive work that has been undertaken by the Custodian Agencies to improve sustainability reporting. |