

ONE PLANET BUSINESS FOR BIODIVERSITY (OP2B) VIEWS ON THE CONVENTION ON BIOLOGICAL DIVERSITY DRAFT ONE OF THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK

August 2021

This paper aims to outline OP2B's views on the Convention on Biological Diversity's (CBD) draft one of the post-2020 global biodiversity framework (CBD/WG2020PREP/3/3).

OP2B members appreciate the opportunity to contribute comments on the updated zero-draft and welcome the set of goals, targets, and actions outlined in the suggested framework. They specifically welcome with strong appreciation the increased inclusion of the private sector in the draft 1, notably through the addition of G.(15)¹ and the whole-of-society approach laid out in I.(15)². OP2B members acknowledge that the challenges facing biodiversity are complex. They are already involved in generating solutions, and engaging in ambitious pathways to accelerate change for the protection and restoration of biodiversity. Nature is a complex system, comprised of both natural and managed ecosystems, both of which have to be taken into consideration. Thus, OP2B members warmly welcome the reinforced emphasis on the inclusion of all stakeholders. In light of the possibility of negative spill over effects from managed to natural ecosystems, it is important to include the productive sector. Negative spill over effects may deter the desired outcomes from conservation efforts, which underlines the necessity of the inclusive approach that the CBD is taking. In light of the important impact of agriculture on nature, the sectors dependent on agriculture can make a significant contribution to preserving biodiversity, and can be a vehicle for a nature-positive recovery. Scaling up Regenerative Agriculture to protect soil health, developing product portfolios to boost cultivated biodiversity and increase the resilience of the food system as well as eliminating deforestation are three key actions that aim to nurture and restore biodiversity, which OP2B members are on the path towards today. OP2B members further welcome the emphasis placed on the role of the consumers as stated in point K.(21)(c)³, and the changing of consumption patterns as a solution driver in action target 16⁴.

Furthermore, OP2B members welcome with appreciation the efforts by the CBD secretariat towards creating convergence between the climate and biodiversity conference of the targets, whose outcomes ought to be of a self-reinforcing and non-competitive nature, as visible in target 8⁵ and point

¹ G. 2030 Targets Target 15. "All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal."

² I. Enabling Conditions 15. "It will require a participatory and inclusive whole-of-society approach that engages actors beyond national Governments, including subnational governments, cities and other local authorities (including through the Edinburgh Declaration), 11 intergovernmental organizations, non-governmental organizations, indigenous peoples and local communities, women's groups, youth groups, the business and finance community, the scientific community, academia, faith-based organizations, representatives of sectors related to or dependent on biodiversity, citizens at large, and other stakeholders."

³ K. Outreach, awareness and uptake 21.(c) "Promoting or developing platforms and partnerships, including with media and civil society, to share information on successes, lessons learned and experiences in acting for biodiversity."

⁴ G. 2030 Action Targets Target 16. "Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, where relevant the overconsumption, of food and other materials."

⁵ G. 2030 Action Targets Target 8. "Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through ecosystem-based approaches, contributing at least 10 GtCO₂e per year to global mitigation efforts, and ensure that all mitigation and adaptation efforts avoid negative impacts on biodiversity."

J. (20)⁶. OP2B also welcomes the efforts in creating more granularity within the framework, by listing parties in the convention such as in point I.(15). Regarding the governance, OP2B welcomes the growing importance of the multi-stakeholder and territorial approach, noting that the challenge will lie in the creation of a reporting framework that is comprehensive, yet accessible and granular enough. A key issue for OP2B members here, that has yet to be addressed and that the CBD secretariat may wish to consider, is how to structure the embedding of private sector reporting into the overarching framework.

Following OP2B's May 2021 contribution to the updated zero-draft, OP2B members wish to highlight the following aspects of the draft one in the creation of a post-2020 framework that will effectively protect and promote sustainable use of the world's biodiversity.

a) Mobilizing resources

OP2B members fully align with the CBD on the notion that action to protect biodiversity needs the right enabling conditions, which includes the adequate mobilization of resources. They welcome with appreciation the dedication of target 18⁷ to this notion. In the context of the CBD's proposals in action target 19⁸, OP2B members would encourage a strengthening of action target 18, to envisage full redirection and repurposing of all subsidies and incentives harmful to biodiversity, as defined by the OECD⁹, so that their elimination are rather a re-direction supporting better practices. OP2B members wish to strongly emphasize the concept of redirection. Indeed, the global economy is currently not in a position to create new financial resources at scale, making it even more important that currently available resources are fully used to change practices and promote sustainable use of biodiversity. Redirecting subsidies harmful to biodiversity is an important avenue to increase the financial resources available for the goals of the GBF, while eliminating harmful subsidies will decrease the amount of damage done to ecosystems, meaning that less resources will have to be spent on restoring them. This strategy can play a key role in speeding up the transition while keeping it accessible to all stakeholders. Still, OP2B members wish to emphasize the need to establish a clear taxonomy on what harmful subsidies are, taking the OECD report as a baseline. To ensure the alignment of public authorities globally, and the possibility for all to make well-informed choices, subsidies in question should be carefully evaluated, taking into account their intent and outcomes, as e.g. not all agricultural subsidies are harmful, and thus not all have to be changed.

b) Specifying the contributions made by the private sector

OP2B members welcome the direction and fully align with the CBD on the need to reduce the negative impacts on biodiversity, increasing the positive impacts on biodiversity, as noted in action target 15.

⁶ J. Responsibility and transparency 20. "The development of additional and complimentary approaches is encouraged to allow other actors to contribute to the implementation of the framework and report on commitments and actions."

⁷ G. 2030 Action Targets Target 18. "Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity."

⁸ G. 2030 Action Targets Target 19. "Increase financial resources from all sources to at least US\$ 200 billion per year, including new, additional and effective financial resources, increasing by at least US\$ 10 billion per year international financial flows to developing countries, leveraging private finance, and increasing domestic resource mobilization, taking into account national biodiversity finance planning, and strengthen capacity-building and technology transfer and scientific cooperation, to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework."

⁹ 6 OECD (2003), Environmentally Harmful Subsidies: Policy Issues and Challenges, OECD Publishing, Paris, <https://doi.org/10.1787/9789264104495-en>.

In order to ensure the continued reduction of negative impacts, the notion of “regularly assessing” impacts may be added, in order to reduce the risk of foregoing newly arising impacts. In order for the economic sphere to be able to contribute effectively to the transition, it is important that the framework be sensitive to the differences between different sectors and value chains, and give well-adapted guidance to the different stakeholders. This is especially key, as private sector actors face a knowledge gap: many methodologies, data baselines, and improvement pathways are not fully developed or mature at this stage, posing added difficulty for stakeholders, especially so for small business. In this perspective, it is important to create simple and accessible reporting frameworks. In that regard, OP2B members welcome the work done by the Science Based Targets Network, and encourage the development of aligned assessment frameworks. In this view, action target 15 may be complemented by sub targets quoting the individual sectors and their proposed actions, in order for business to be able to engage in a monitored way. Accountability is a key motivator, and segregation along the value chains along with the resulting accountability will enable business to move forward.

The objective of implementing regeneration should be added wherever possible, such as in action target 10¹⁰. As written, the ambition of the target is to maintain sustainability. OP2B members would appreciate an increased ambition, promoting regenerative practices and the use of the power of nature to restore what has been damaged. OP2B members welcome the added notion on the sustainable use of biodiversity.

OP2B members further emphasize the need to attract attention to the loss of genetic biodiversity, and the need to protect it. In this view, they would like to introduce the word “diversity” into the language of action target 10. The members call on the CBD secretariat to introduce this notion into the targets.

OP2B members welcome with appreciation the clarification of action target 7¹¹, a key indicator for the members to measure their progress in reducing their impact on nature. They suggest for action target 7 to also recognize the importance of heritage plastic already present in ecosystems. Adding this additional indicator would help accelerate nature recovery, as some technologies for recovering certain types of heritage plastic pollution are already in existence and ready to be deployed.

c) Increasing the availability of knowledge while progressing in the transition

OP2B members acknowledge the scale of the transition that is awaited from society, and welcome with much appreciation the inclusion of the notion of local community knowledge in action target 20¹² as well as in I.(15)¹³. When considering regenerative agriculture, and nature based solutions at large, OP2B members acknowledge that most of the innovation will derive from practitioners on the field

¹⁰ G. 2030 Action Targets Target 10. “Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.”

¹¹ G. 2030 Action Targets Target 7. “Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.”

¹² G. 2030 Action Targets Target 20. “Ensure that relevant knowledge, including the traditional knowledge, innovations and practices of indigenous peoples and local communities with their free, prior, and informed consent, guides decision-making for the effective management of biodiversity, enabling monitoring, and by promoting awareness, education and research.”

¹³ I. Enabling Conditions 15. “It will require a participatory and inclusive whole-of-society approach that engages actors beyond national Governments, including subnational governments, cities and other local authorities (including through the Edinburgh Declaration), 11 intergovernmental organizations, non-governmental organizations, indigenous peoples and local communities, women’s groups, youth groups, the business and finance community, the scientific community, academia, faith-based organizations, representatives of sectors related to or dependent on biodiversity, citizens at large, and other stakeholders.”

and underline the need to elevate this resource. OP2B members welcome the promotion of further research as stated in action target 20, as there is a strong need to progress on the baseline of knowledge that is available today. They welcome all efforts aimed at improving the data available on the status of the planet. OP2B members suggest to place a focus on tools such as spatial planning and the cataloguing of species in order to enhance the base of knowledge available to decision makers.

d) Emphasizing the need for action based targets

OP2B members welcome with appreciation the action targets that the CBD has put forward. They urge for the development of an ambitious framework matching the gravity of the challenge that needs to be overcome. In the context of the urgency with which action to protect biodiversity and ensure its sustainable use is needed, OP2B members urge the CBD to encourage immediate action from stakeholders. Increased emphasis might be placed on wording to ensure implementation of intermediate action based targets, complementary to long term result based targets. In spite of the aforementioned lack of a baseline of knowledge, it is important to now encourage actions that yield immediate outcomes, although focus on results-based targets will remain important in the future. OP2B members wish to stress that resource mobilization should include this consideration, and that financial resources should be used to promote immediate actions, in order to ensure that no time is lost in combatting the biodiversity crisis and transition into a nature positive economy.

About One Planet Business for Biodiversity (OP2B)

One Planet Business for Biodiversity (OP2B) is a unique international cross-sectorial, action-oriented business coalition on biodiversity with a specific focus on agriculture. The coalition is determined to drive transformational systemic change and catalyse action to protect and restore cultivated and natural biodiversity within the value chains, engage institutional and financial decision-makers, and develop and promote policy recommendations in the Convention on Biological Diversity (CBD) COP 15 framework to be held in 2021. Hosted by the World Business Council for Sustainable Development (WBCSD), the coalition currently consists of twenty-seven companies.

Annex – Proposed Language Amendments

Current Text	Suggested Amendment
<p>G. 2030 Action Targets Target 7</p> <p>Reduce pollution from all sources to levels that are not harmful to biodiversity and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste.</p>	<p>G. 2030 Action Targets Target 7</p> <p>Reduce pollution from all sources to levels that are not harmful to biodiversity, including diversity of soil organic matter, and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and pesticides by at least two thirds and eliminating the discharge of plastic waste and by establishing goals to address heritage plastic.</p>
<p><i>Justification: OP2B welcomes the ambition of Target 7. Adding the notion of biodiversity in soils may clarify and focus the reduction of nutrients lost to the environment to soils. In order to accelerate</i></p>	

nature recovery, and as the technologies for recovery of heritage plastic are currently under experimentation, an additional indicator on recovery of leaked plastic in the environment may be added.

Current Text	Suggested Amendment
<p>G. 2030 Action Targets Target 10</p> <p>Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.</p>	<p>G. 2030 Action Targets Target 10</p> <p>Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the diversity conservation, regeneration, and sustainable use of biodiversity, and when needed by increasing the productivity and resilience of these production systems.</p>
<p><i>Justification: OP2B welcomes the inclusion of the notion of resilience in the target. Regenerative agricultural practices can significantly contribute to the sustainability and resilience of biodiversity, which is why the notion might be added to the target. As emphasized by FAO, soil as an ecosystem is essential for biodiversity goals, which is why soil health may be included in the table of ecosystems in the sub-targets. Increased emphasis should be placed on the need to halt the loss of genetic diversity, which is why OP2B proposes to add the notion of diversity here. As not all production systems are in need of an increase in productivity, indeed some systems are at risk of overproduction, OP2B suggests to amend the target to only add the productivity increase when it is necessary.</i></p>	

Current Text	Suggested Amendment
<p>G. 2030 Action Targets Target 15</p> <p>All businesses (public and private, large, medium and small) assess and report on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative impacts, by at least half and increase positive impacts, reducing biodiversity-related risks to businesses and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal.</p>	<p>G. 2030 Action Targets Target 15</p> <p>Option 1: All businesses (public and private, large, medium and small) regularly assess and report on their dependencies and impacts on biodiversity, from local to global, and avoid their negative impacts, contributing to reduce biodiversity-related risks to businesses, and moving towards the full sustainability of extraction and production practices, sourcing and supply chains to align all activities to a nature-positive economy.</p>
<p><i>Justification: OP2B welcomes the introduction of an action target relating specifically to business, highlighting the contribution the private sector can make. OP2B wishes to emphasise that stakeholders need to follow a continuous approach in identifying negative impacts. As only identified impacts can be reduced, continuous re-assessment and prioritization of business operations is necessary to avoid foregoing possible reductions. Clear guidelines on reporting would be needed, OP2B recommends that the CBD Secretariat and parties recognise the efforts made via the Science-Based targets for Nature network, to create reporting toolkits for businesses, cities and other organisations. Additional attention should be paid to the harmonizing of reporting</i></p>	

guidelines. The additions clarify the flow of the target, and thereby better support the ambition on which business is already working around: the mitigation hierarchy concept supported by SBTN, which refers to identifying, avoiding, reducing, mitigating, and acting on net-gain¹⁴.

Current Text	Suggested Amendment
<p>G. 2030 Action Targets Target 18</p> <p>Redirect, repurpose, reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.</p>	<p>G. 2030 Action Targets Target 18</p> <p>Redirect, repurpose, or reform or eliminate incentives harmful for biodiversity, in a just and equitable way, reducing them by at least US\$ 500 billion per year, including all of the most harmful subsidies, and ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity. Create an internationally aligned, extensive taxonomy of subsidies based on OECD definitions, upon which subsidies are evaluated.</p>
<p><i>Justification: The ambition has to include the elimination of all subsidies harmful to biodiversity as defined by the OECD, as in the face of continued biodiversity degradation this practice is not at all feasible. It is critical that incentives are appropriately redirected and repurposed towards actions that regenerate nature and increase biodiversity resilience. Such subsidies should target techniques in favour of soil recovery, farm diversity and climate resilience.</i></p>	

¹⁴ <https://www.thebiodiversityconsultancy.com/approaches/mitigation-hierarchy/>