



5th August 2021

Australian Government
Department of Agriculture, Water and the Environment
GPO Box 787 Canberra
ACT 2601

By Email: CBDAustralia@awe.gov.au

Dear Ms McMorrow,

First Draft of Post 2020 Global Biodiversity Framework and associated headline indicators

Thank you for the opportunity to respond to this important milestone along the CBD's Global Biodiversity Framework pathway.

The Australian Land Conservation Alliance (ALCA) represents a substantial collective of land restoration and conservation organisations working with landholders on privately owned and managed land across Australia. Our members together represent a substantial and growing voice in Australia's land management sector.

Together ALCA members work across over 3 million square kilometres, with more than 3000 landholders. We have over 50,000 supporters and combined annual turnover exceeds \$250 million.

Australia has the largest area in privately protected areas of any country in the world making those who work on privately owned and managed land a critical voice in Australia's ability to monitor, progress and achieve targets.

Key issues

ALCA welcomes the updated First Draft of the Post-2020 Global Biodiversity Framework (Framework) and the opportunity to provide feedback to assist in strengthening it further. With climate action failure, biodiversity loss and infectious diseases counted as the top three risks¹ in the World Economic Forum's Global Risk Report, we need an economic and societal transformation. This can be supported by an ambitious Global Biodiversity Framework, coupled with strong cross-cutting frameworks such as other United Nations Framework Conventions (Climate Change, Desertification, migratory species, Ramsar Wetlands and International Trade) and the Sustainable Development Goals.

We welcome a number of improvements of this First Draft, including a stronger logic between the Goals, Milestones and Targets that more clearly reflect the Theory of Change. Some of the changes in the words within these elements demonstrate that previous feedback has been received and negotiations have enabled the strengthening of some areas, including for example, the inclusion of connectivity and representation within the biodiversity targets.

It does however still lack the kind of ambition, supported by unambiguous, stronger targets, that are truly required to respond with the urgency so clearly outlined in the Framework's Purpose and Theory of Change. The Theory of Change identifies that urgent policy action is required globally, regionally and nationally; and a whole of government and society approach is necessary. However the detail in

¹ The Global Risks Report 2021, 16th Edition, World Economic Forum.

the targets do not yet drive the kind of policy, financial and systemic change needed. The draft does not yet address the perverse impacts of land use on biodiversity; and references to effective policy and regulation to ensure these perverse effects are minimised must be strengthened. We outline how this can be achieved below.

2050 Goals and 2030 Milestones

ALCA welcomes the structural changes that more clearly link the Goals, Milestones and Targets to the Theory of Change. ALCA welcomes the significant efforts to develop a narrative that reflects Biodiversity as foundational for all of society – linking people to planet and strongly demonstrating the value of nature to livelihoods, human communities and the economy.

However, the Goals and Milestones fall short on the ambition and urgency needed within appropriate timeframes to drive the systemic change outlined in the Framework’s Purpose and Theory of Change. Any delay in addressing the biodiversity crisis will increase the cost of reversing nature decline, which will have higher societal and economic impacts². With only 15% of government incentives (e.g. public subsidies and market price support for farmers) that support sustainable outcomes globally³, we need a clear milestone or target that drives a change in policy and investment towards positive incentives.

Goal A:

- The goal for the “...integrity of all ecosystems is enhanced with an increase of at least 15% in area, connectivity and integrity” has dropped from 20% in a previous draft to 15%. We recommend this be lifted again to 20%.
- A tenfold reduction in the rate of extinctions by 2050 is not ambitious. The goal should include an unambiguous mission to halt and reverse biodiversity loss by 2030.

We endorse the disaggregation of Milestones A1 and A2. These both could still be stronger.

Milestone A1:

- We are pleased to see the inclusion now of a net gain approach – these must leave ecosystems better off in terms of extent *and* condition.
- Given our current trajectory, biodiversity is likely to go down before we begin to see it go up again – it is important to have a goal that seeks to reverse this trend, within the 2030 milestone timeframe. This goal could go further to say no loss in ecosystems with high biodiversity and ecological integrity.
- It is critically important that high conservation value habitats, highly intact ecosystems and sites critical to persistence of biodiversity, rare/unique ecosystems receive prioritised conservation efforts. Appropriate targets to ensure we meet this will then be required (or built into others).

Milestone A.2

- While we agree that we need to halt or slow the extinction rate, we believe we can go further and set an unambiguous milestone that seeks to halt and reverse biodiversity loss by 2030. This would better reflect what is needed and the urgency of the current situation.

Targets

We endorse a number of the changes made to the targets in this first draft framework, which are now clearer, more specific and ambitious (noted below). However, in order to achieve the milestones,

² Dasgupta, P. (2021), *The Economics of Biodiversity: The Dasgupta Review*. (London: HM Treasury)

³ *The Future of Nature and Business: New Nature Economy Report II*. 2020. World Economic Forum.

some targets must be more specific or ambitious. For example, consider addressing more strongly the systemic threats to biodiversity here such as the impacts of climate change, deforestation and land clearing. We outline specific feedback to targets below:

Reducing threats to biodiversity

Target 1: An earlier draft had reference to both planning and policy. The reference to the need for policy has now been removed from this target, and there does not appear to be a reasonable substitute to ensure that progressive/effective policies that drive and enable the milestones to be achieved are included in the targets. Target 18 does now address the issue of incentives harmful for biodiversity.

Target 2: the definition for priority ecosystems may not be clear to all responsible agencies, which could result in protection strategies being delayed. Suggest this could be changed to *“areas that enhance ecosystem function for high conservation value habitats, highly intact ecosystems and sites critical to persistence of biodiversity, rare/unique ecosystems must be strictly protected”*.

Target 3

- We strongly support separate targets of 30% protection for lands and for oceans in this target but suggest ‘freshwater’ also be added to avoid any ambiguity as to whether this is included in the ‘land’ component of the target.
- We endorse the inclusion of the 30% target. However to be effective, this target must be underpinned by an effective management and/or ecosystem management target.
- We endorse the inclusion now of representation and connectivity into this target. It is critical this remains and has been a fundamental part of Australian science and policy related to reserve systems for the past quarter of a century.
- This target should consider a sub-target that ensures at least 20% of the 30% is under Protected Area status, with 10% (or less) protected through OECMs.

Target 4: Should be strengthened with a reference to halting biodiversity loss and/or reversing the trajectory of species decline.

Target 8: We and others have previously recommended the use of *“nature-based solutions”* – which is clearly defined by the IUCN. This could be used in place of *“ecosystem-based approaches”*.

Tools and solutions for implementation and mainstreaming

Given the urgency of addressing biodiversity threats, including for protection for our livelihoods outlined in the Purpose and Theory of Change, Targets 14 through 21 must remain strong to truly drive substantial reduction in threats to biodiversity.

Targets 14, 15, 16 and 17: We welcome the mutually reinforcing targets 14, 15, 16 and 17, but they currently lack SMART targets: stronger policy and regulatory targets are important to drive improved outcomes for biodiversity. Equally, mainstreaming our value for nature into all facets of government, business and industry will be required to drive the change needed.

Target 18: We support a strong target for the redirection, repurposing, reforming or elimination of incentives harmful for biodiversity, in a just and equitable way. The quantum of which must be reasonable to drive the change required in a meaningful timeframe.

Target 19: While we welcome a target that drives increased financial resources allocated to the protection of biodiversity, with a significant current funding gap of between \$598 billion and \$824

billion per year⁴, the target of \$200 billion per year remains substantially short of what is needed to drive transformative change.

Targets 20 and 21: We support fair access to benefit sharing regarding nature-based resources – in particular for First Nations people. There is currently limited/no reference to cultural importance and values of biodiversity within the earlier targets. While they are outlined in targets 21-21, consider their relevance across earlier targets.

Implementation and enabling conditions

Implementation of the Framework requires integrative governance and whole-of-government approaches to ensure policy coherence and effectiveness, political will and recognition at the highest levels of government.

Government and societies need to determine priorities and allocate financial and other resources for/to biodiversity, internalise the value of nature and recognise the cost of inaction. In Australia we have a significant opportunity to lean into this global framework. The bushfires of 2019/20 brought about an overwhelming societal shift in the understanding of the impacts of climate change, and the need for a transformational shift in our food, fibre and extractive industries.

ALCA and its members are ready to get behind the delivery of a strong national response that coordinates and collaborates around transformative actions; and to develop and deliver tools and solutions for implementation and mainstreaming. Financial resources, capacity and technology are building around the transformation of food and fibre systems. ALCA is working hard with its members to build these capabilities to enable the private land conservation sector to innovate and coordinate around its common agenda. Any response in Australia will require the full and effective participation of indigenous peoples and local communities in the implementation of this framework. With > 60% of land in Australia privately managed for a range of land uses, the potential for strong uptake of our national response to this global agenda is significant.

Conservation, land management, and indigenous organisations are ready to rise to the challenge – with enabling policies, and access to adequate resourcing. For this to be achieved, Australia needs to build in sufficient resourcing – including redirecting resources from harmful subsidies, the expectation of national budgeting for nature, capacity building and mutual learning, and investing in organisations that can mobilise public engagement across a broad base.

We look forward to working with you to deliver a strong national agenda that ensures that biodiversity is valued, conserved, restored and wisely used, sustaining a healthy and resilient Australia.

Australian Land Conservation Alliance

⁴ Deutz, A., Heal, G. M., Niu, R., Swanson, E., Townshend, T., Zhu, L., Delmar, A., Meghji, A., Sethi, S. A., and Tobinde la Puente, J. 2020. Financing Nature: Closing the global biodiversity financing gap. The Paulson Institute, The Nature Conservancy, and the Cornell Atkinson Center for Sustainability.