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Review of the document on scientific and technical information to support the review of the proposed goals and targets in the updated zero draft of the post-2020 global biodiversity framework

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General comments		

We support the calls by a number of Parties during the informal session of SBSTTA 24 for the framework to be strengthened with regards to its reflection of the ocean, including the need to strengthen indicators for marine and coastal biodiversity in particular welcoming the comment by Egypt that marine ecosystems are monitored by condition and not extent. Whilst coral reefs can be monitored by both, it is critical to have indicators that measure integrity /condition of coral reef ecosystems, such as those proposed by ICRI. See ICRI Recommendation here: https://www.icriforum.org/wp-content/uploads/2021/02/ICRI-Recommended-Indicators-for-SBSTTA-24-6.pdf

Note with concern the proposals to only adopt headline indicators at COP 15. The experience from delayed adoption of indicators for the Aichi targets showed how detrimental it was to delay adoption of a monitoring framework. We strongly encourage that a fully developed monitoring framework including headline, component and complementary indicators is included within draft Decision for COP 15 to enable implementation and tracking of progress can begin from adoption. Where indicators are not yet available, those can be designated for further consideration by the AHTEG.

Goal A: We note that integrity is defined within Add.2:

Para 16: "Integrity refers to the compositional functional, structural and spatial components of ecosystems." Para 23: "...integrity (functioning and composition) of ecosystems..."

Though we would welcome the definition provided in Add.2 to be added to the glossary document. Further information of ICRI's work on supporting the appropriate inclusion of coral reefs within the Post-2020 GBF can be found at www.coralpost2020.org and we look forward to continuing to support CBD Parties on this issue.

Specific comments			
Page	Paragraph	Comment	
3	11	"It also implies that the downward trend in biodiversity should be halted and reversed (the inflection point) before 2030"	
		ICRI welcomes the urgency shown in the current wording of the mission statement and need for immediate action. It should be noted however that there are some ecosystems that will have a longer lag time before recovery can be seen. The current science	



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		indicates due to the lag time in response between action and effect, coral reef ecosystems will continue to degrade beyond 2030, before the inflection point is reached. It will be important that this does not hamper ambition for other ecosystems, but somehow acknowledged.
5	18	We note that significant net increases of the extent of some ecosystems may not be achievable (e.g. for coral reef ecosystems) and so we fully support an emphasis on avoiding further loss, while improving integrity and connectivity for overall net gain in the contribution of ecosystems to biodiversity and people.
5	19	The suggestion in the last sentence of §19 proposes use of replacement of same or similar ecosystems where critical ecosystems are lost. However we urge caution in applying any such wording as this could result in unintended consequences - especially in the marine environment.
5	22	This paragraph currently states that "Proposed target 1, addressing land-/sea-use change, contribute directly to improving ecosystem extent, while targets"
		We would argue that in the marine environment, addressing land/ sea use change could also lead to improving ecosystem integrity. And so the sentence edited to include "and integrity" to read "Proposed target 1, addressing land-/sea-use change, contribute directly to improving ecosystem extent and integrity"
		It is proposed that the second to last sentence be edited to read "Net gain, or no net loss approaches, if not qualified, carry high risk of harmful outcomes, especially in the marine environment"
11-12	51-53	Target 1: the focus of this document has a terrestrial bias and could usefully draw on the available experience in application of marine spatial planning. In addition to which it should be recognized that marine spatial planning is just one tool for addressing changes in sea use.
		We recommend Parties avoid subjective terms such as "most" and qualifiers such as "where possible" as much as possible to make targets clearer, recognizing that some flexibility will be needed.
		Parties may wish to consider how to sufficiently reflect the varying level maturity in the restoration of different ecosystems and ensure this target is ambitious, but does not trigger perverse incentives in implementation. As an example, we highlight restoration of coral reefs - an emerging area of work that has so far been applied at small scales and with mixed success and high costs (estimated at 400,000USD/ hectare (2010 US\$) (Baryaktarov et al., 2019)). There are active areas of work to explore the role of restoration as part of a continuum of activities including addressing and reducing current threats to coral reefs impacts, remediation, and rehabilitating ecosystem function, following standards developed by the Society for Ecological Restoration. Scientific and technical information regarding the appropriate use of coral reef restoration and related innovations is provided in aUNEP/ ICRI Policy Brief based on Hain et al., 2020 see https://www.icriforum.org/wp-content/uploads/2021/01/Policy-brief.pdf
		Metrics to measure restoration for Coral reef ecosystems has been noted as a gap and ICRI remains ready to work with Parties on developing appropriate metrics.



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12-13	54-56	Target 2: it would help to be specific about protection of 30% of the planet - both on land and at sea. The explanatory paragraphs are heavily focused on land surface/ land area. In particular, paragraph 56 refers only to land and land-use changes
18	72	We agree with the statement that: "Different metrics will be needed for different types of pollution". We also request that reference be made to the need to further develop methods to assess indicators for different types of pollutants (e.g. noise) and in different geographies e.g. adapting the Index of Coastal Eutrophication (ICEP) for use in geographies that do not have river systems, e.g. many island systems.
20	82	"Such key ecosystems may include forests and wetlands especially in upstream areas, coral reefs, mangroves and sea-grass beds. These ecosystem services underpin the health and well-being of people, therefore safeguarding these ecosystem services is a key element of the 2050 Vision for Biodiversity." We welcome the explicit mention of coral reefs and their associated ecosystems in this paragraph and would encourage the application of ecosystem specific indicators, including the use of the coral reef indicators proposed by ICRI which could also be used to help track progress against Target 10.
31	125	We agree with the statement in this paragraph that coral reefs are less prominent in the GBF than they were in the Aichi Targets - despite continued decline the worlds coral reefs and increase in pressures. Parties may wish to highlight the urgency of conserving and sustainable use of coral reef ecosystems through explicit mentions in the GBF, or in the guidance to the financial mechanism to be adopted at CoP15 (as reflected in operative paragraph 1a and the annex of the ICRI recommendation (see https://www.icriforum.org/documents/recommendation-on-the-inclusion-of-coral-reefs-and-related-ecosystems-within-the-cbd-post-2020-global-biodiversity-framework/)

Disclaimer: Please note that this submission is provided as a contribution by an ICRI ad hoc committee. It does not represent any agreed statement of policy by ICRI members, nor does the submission prejudice any future negotiation positions.