

## SERIOUS CONCERNS AND SERIOUS QUESTIONS

### GFO'S ASSESSMENT OF THE FIRST DRAFT OF THE POST 2020 GLOBAL BIODIVERSITY FRAMEWORK

On 5 July 2021, the Convention on Biological Diversity published a first draft of the post 2020 global biodiversity framework.<sup>1</sup> It follows previous so-called zero drafts.<sup>2</sup>

#### **1. The concerns:**

**This new draft unfortunately confirms in our view the strong focus on putting a price on nature and on biodiversity offsetting**, despite the related well-documented issues,<sup>3</sup> including the fact that what is being valued is not nature, not even a proxy.

Evidence of that can be found in the below sentences:

*“Governments and societies need to determine priorities and allocate financial and other resources, **internalize the value of nature** and recognize the cost of inaction.”*

=> We understand ‘internalizing the value of nature’ to mean calculating a monetary price for nature and its destruction.

*“**Nature’s contributions to people are valued.**”*

*“Nature and its **contributions to people** are fully **accounted.**”*

=> This refers to ecosystem services accounting, ecosystem services being defined as nature’s contribution to the well-being of people. In layman language, this means putting a monetary value of a narrow range of ecosystem functions, using controversial monetary valuation methodologies, and claiming that this represents the value of nature.

*“Target 8. Minimize the impact of climate change on biodiversity, contribute to mitigation and adaptation through **ecosystem-based approaches.**”*

=> Ecosystem-based approaches (EbA) is defined by the CBD as follows: *““EbA is the use of biodiversity and ecosystem services as part of an overall adaptation strategy to help people adapt to the adverse effects of climate change.”*<sup>4</sup> The words “ecosystem services” are a clear reference to the natural capital framing approach, that calls to put a price on a narrow unrepresentative vision of nature.

Related question: is “ecosystem-based approach” a new codeword to replace the debunked “nature-based solutions,” “natural capital” and “biodiversity offsetting”?

*“Target 14. **Fully integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies, accounts, and assessments of environmental impacts at all levels of***

<sup>1</sup> <https://www.cbd.int/doc/c/abb5/591f/2e46096d3f0330b08ce87a45/wg2020-03-03-en.pdf>

<sup>2</sup> <https://greenfinanceobservatory.org/wp-content/uploads/2020/09/updatezerodraftCBD2.pdf>

<sup>3</sup> <https://greenfinanceobservatory.org/wp-content/uploads/2019/05/50-shades-biodiversity-final.pdf>

<sup>4</sup> <https://www.cbd.int/article/biodiversityagainstclimatechange-1>

government and across all sectors of the economy, ensuring that all activities and financial flows are aligned with biodiversity values.”

=> We understand this to be an unambiguous call to put a monetary value on biodiversity and to base future environmental policies on this financialised approach to nature.

“Milestone A.1: **Net gain** in the area, connectivity and integrity of natural systems of at least 5%.”

=> The reference to “net” means by definition offsetting, as net is calculated as the net result of destruction and restoration. This confirms in our view that biodiversity offsetting is included in one of the 4 long term goals of the post2020 framework.

## **2. The questions:**

The post 2020 biodiversity framework “will be implemented (...) recognizing the principle of intergenerational equity.”

Question 1: How is the principle of intergenerational equity to be recognised? Through equal rights for current and future generations, or through a morally debatable positive discount rate?

“Target 3. Ensure that at least 30% globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.”

Question 2: how does the CBD plan to address the concerns<sup>5</sup> expressed by several NGOs about the so-called “fortress conservation” approach?

“Target 18 (...) **ensure that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity.**”

Question 3: What are these biodiversity-positive or neutral private economic and regulatory incentives? Will they include market-based schemes?

“Target 19. Increase financial resources (...) **international financial flows to developing countries, leveraging private finance**, (...) taking into account national biodiversity finance planning, (...) to meet the needs for implementation, commensurate with the ambition of the goals and targets of the framework.”

Question 4: Are international finance flows and private finance the most appropriate tools to foster biodiversity conservation in developing countries? And what are the expected terms, conditions and compensation for such financing flows?

We look forward to future drafts and to the CBD COP15 conference to address these concerns and answer these questions of crucial public interest.

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<sup>5</sup> <https://www.survivalinternational.org/news/12570>

<https://www.nature.com/articles/s41893-019-0423-y>

<https://www.rainforestfoundationuk.org/un-plan-to-protect-30-percent-of-the-planet-by-2030-could-displace-hundreds-of-millions-ngos-and-experts-warn>