



World Business Council for Sustainable Development (WBCSD) Recommendations on the Post-2020 Global Biodiversity Framework Draft One

[WBCSD](#) is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world. We help make our member companies more successful and sustainable by focusing on the maximum positive impact for shareholders, the environment and societies. Our member companies come from all business sectors and all major economies, representing a combined revenue of more than USD \$8.5 trillion and 19 million employees. Our Global Network of almost 70 national business councils gives our members unparalleled reach across the globe. Together, we are the leading voice of business for sustainability: united by our vision of a world where more than nine billion people are all living well and within the boundaries of our planet, by 2050.

As a founding partner of Business for Nature, WBCSD fully supports all their [suggestions and text amendments](#). In addition, WBCSD would like to take the opportunity to provide further specific recommendations that complement Business for Nature’s position.

Contents

Executive Summary.....	1
General view and points of concern	2
Text amendment recommendations	3

Executive Summary

WBCSD welcomes Draft 1, but is still concerned about several points in the Framework that can be further strengthened. In particular, we would like to stress four overarching points:

1. Set a global mission for nature that will drive business action
2. Design SMART Targets, actionable by business, that address nature loss drivers
3. Value and embed nature into all decision-making
4. Encourage and support fair, equitable, simple and an innovation friendly Access and Benefits Sharing mechanism

WBCSD fully supports Business for Nature’s position paper, but would like to share a few additional text amendment suggestion on the following targets to bring forward the view of our members:

- Target 7 on pollution
- Target 15 on mainstreaming the value of nature for business

General view and points of concern

WBCSD welcomes the opportunity to provide comments on the Post-2020 Global Biodiversity Framework's Draft One ahead of the Third Open-ended Working Group. We want to congratulate the parties, the Secretariat, and the Co-Chairs of the Open-ended Working Group to present this new draft which has progressed significantly from the previous text.

In general, WBCSD supports Draft One, especially with the new inclusion of a specific Target on business. However, we remain concerned about several points in the Framework. In the coming sections we have given our overall comments on the draft followed by more specific text amendment suggestions to strengthen the Framework so that all stakeholders can work towards halting and reversing nature loss by 2030 and create a nature-positive future.

In particular we wanted to highlight the following points on Draft One:

1. Set a global mission for nature that will drive business action

The current proposed mission does not reflect the ambition level needed to achieve the 2050 vision and must therefore be strengthened. A clear and ambitious mission to halt and reverse biodiversity loss by 2030 should be an essential element of the Framework.

This would mean that by 2030, we must have halted and reversed nature loss to be net-positive measured from a baseline of 2020: nature must start to recover, through improvements in the health, abundance, diversity and resilience of species, populations and ecosystems so by 2050 we can achieve the CBD vision of living in harmony with nature.

Even though there is not yet a robust scientific basis for what constitutes "nature-positive", we wanted to alert the Parties that the [Earth Commission](#) is working to provide this scientific basis in publications scheduled to be launched in 2022.

2. Design SMART Targets, actionable by business, that address nature loss drivers

We understand the biodiversity agenda is a complex one and we would like to congratulate the secretariat and all other actors for bringing forward a comprehensive and well researched framework. We would like to stress though that several Targets are incredibly hard to understand. We would therefore ask the Parties to help simplify the Targets and Milestones in the Framework so that they can also be understood outside of the conservation community.

While this Framework is not for business to deliver, it cannot be realized without business's meaningful engagement. The private sector has a critical role to play as a source of finance, as a driver of innovation and technological development, and as a key engine of economic growth and employment. In addition, the private sector can drive and promote technologies that reduce the environmental impact of our societies to nature, while nonetheless requiring a predictable, science-based policy environment that also accounts for the trade-offs. Therefore, making the Framework easy to understand will be a key step to get the whole business community (including SMEs) to take appropriate actions.

In addition, several Targets in the Framework are not quantified. We recommend the Parties to ensure that all Targets are SMART (specific/simple, measurable, achievable, relevant and time-bound) to ensure progress is made and tracked accordingly.

3. Value and embed nature into all decision-making

We commend the secretariat for bringing forward the Targets 14, 15 and 16 that support the mainstreaming of biodiversity. However, we think these Targets could be further strengthened to bring forward the need for governments to support and build capacity in businesses so that they are in a place where they can support the delivery of this Framework. Therefore please see our proposed text amendments for Target 15 later on in this document to further strengthen this Target on the role of business.

Mainstreaming of biodiversity needs to be across the Rio Conventions and other international agreements, across departments within country governments and into decision making by governments, business and society as a whole. Policy coherence and integration between the nature, climate, food, health, prosperity and inequality agendas is vital to ensure that nature and biodiversity are no longer dealt with in a silo but as part of solutions to other societal problems. We welcome that the secretariat has provided the link to climate change, but this can also be further strengthened. Nature-based solutions will be a key part of the solution, delivering benefits for climate, nature and society.

4. Encourage and support fair, equitable, simple and an innovation friendly Access and Benefits Sharing mechanism

The terms to facilitate access to and utilization of genetic resources should support fair, equitable, simple, and innovation friendly mechanism. This is essential to achieve the objectives of research and training defined in [Article 12 of the CBD](#): to promote and cooperate in scientific advances in biological diversity research; to develop programs for scientific and technical education; and to promote technology transfer, collaboration and capacity building.

We therefore ask the Parties to consider developing indicators to measure the creation of both monetary and non-monetary benefits. These indicators should be for use by all stakeholders in the context of biodiversity conservation and sustainable use.

Please find below further text amendment recommendations to strengthen specific Targets that are business relevant.

Text amendment recommendations

We have outlined two suggested text amendments for Targets that are especially relevant for the business community. We are building further on the Business for Nature position paper, which WBCSD fully supports. The Targets that we will highlight are as follows:

- Target 7 on pollution
- Target 15 on mainstreaming the value of nature for business

Target 7 – Pollution

WBCSD welcomes a target on reducing pollution from all sources to protect and halt further nature loss. We would like to highlight two particular points on this target:

- Concerning agriculture, we agree that pollution from pesticides needs to be reduced and this can be achieved even more efficiently through precision application and related innovation. In addition, a good degradability of pesticides, irrespective whether natural or synthetic and of the agricultural system where used, can contribute to reducing pollution. Thirdly, a broader enablement of integrated crop management practices can ensure sufficient yields while sensitive to the environment and economic requirements ([Agra CEAS, 2002](#)) taking also into account the implications of land use.
- We also would like Parties to consider developing a support system for the creation of a circular economy, to reduce the possible leakage of pollutants into ecosystems (plastic recycling, aluminum recycling, closed water systems, etc.) and to increase support for technologies utilizing recycled materials.

We recommend parties therefore to take a systems approach to enable a nature-positive outcome and transparently address potential trade-offs.

Please find our rationale for the proposed text amendments:

- When it comes to nature-positive outcomes, it is not the volume of pesticides that is decisive but the net environmental impact. For fertilizers this is already addressed in the current wording, because it clearly relates to avoidance of nutrient loss from the field. For pesticides, the message should be consistent to the fertilizers and relate to avoidance of excessive amounts while enabling suitable pest control. Impact measurements (e.g. within ecotoxicology) are already part of many regulatory data packages that are submitted to register these products. So the data is available to authorities. Similarly, the degradability of active substances is also part of regulatory data packages where it is commonly referred to as environmental fate.
- We would also like to make a point on the indicator related to this Target. This indicator takes the position that uses of pesticides on existing cropland are per se qualified pollution, even when regulated, authorized and used in accordance with the guidance provided. We would therefore recommend the following indicator instead to be used: “Pesticide residues in the environment, wildlife and food represented by data from monitoring programs in countries” (as demanded by Article 5.1.11 of the International Code of Conduct on Pesticide Management).
- The environmental impact of other agricultural inputs and tools than pesticides and fertilizers is currently omitted. This is not realistic, as mechanical methods (mining, ploughing, harrowing, etc.), especially when heavy machinery is used, can have highly detrimental effects on nature leading to soil erosion or soil compaction. This is of high relevance to farmers (and also to biodiversity, e.g. within soils and of adjacent water bodies when concerned).
- To reduce the overall environmental impact of agriculture, an integrated crop management approach is suggested as it combines environmental sensitivity, economic viability, modern techniques and a whole farm approach ([Agra CEAS, 2002](#)). Adding the notion of soil biodiversity is important to clarify the objective of the target and to focus on the reduction of nutrients lost to

the environment to the improvement of soil biodiversity. It would increase convergence with the review of the international initiative for the conservation and sustainable use of soil biodiversity and updated plan of action by SBSTTA.

- Our understanding is that the “discharge of plastic waste” covers illegal dumping as well as legally permitted landfilling, and incorporates micro-plastics. This should be reflected in the definitions and relevant indicators ([Business for Nature CBD Position Paper](#)).
- To accelerate nature recovery, addressing the environmental crisis of already leaked plastic in the environment is essential and must be recognized in the target. Technologies for recovery of leaked plastic already exist ([Business for Nature CBD Position Paper](#)).

The proposed text amendment:

Current text	Suggested amendment
<p>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.</p>	<p>Target 7. Reduce pollution from all sources to levels that are not harmful to biodiversity, including soil biodiversity, and ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and the environmental impact of agriculture, including pesticides and other agricultural inputs and tools, by at least two thirds and eliminating the discharge and leakage of plastic waste and reducing leaked plastic in the environment.</p>
<p>Clean version</p> <p>Target 7. Reduce pollution from all sources to levels that are not harmful to biodiversity, including soil biodiversity, ecosystem functions and human health, including by reducing nutrients lost to the environment by at least half, and the environmental impact of agriculture, including pesticides and other agricultural inputs and tools, by at least two thirds and eliminating the discharge and leakage of plastic waste and reducing leaked plastic in the environment.</p>	

Target 15 – mainstreaming the value of nature for business

We strongly welcome target 15 to show that business is needed to ensure we reach a nature-positive economy. However, the targets could be further clarified to ensure concrete positive impact and it will need to be supported by clear indicators demonstrating the way for impactful actions and change.

Our rationale for the proposed text amendments:

- We welcome the focus on the role of business, but we do want to stress that the Framework is not for businesses to deliver. As the Framework is for Parties and all other targets explain what Parties will do to support the transformation, this target should also clarify that Parties will

enable businesses to act. To do that, without creating more confusion and additional burden on business, Parties should standardize and align appropriate mechanisms such as regulatory, incentive and support measures to ensure that all businesses contribute and transform their practices.

- A key element of transformation is to value and embed nature into all actors’ decision-making, including for business. This element must be strengthened in Target 15 to complement and echo Target 14 that addresses mainstreaming in governments and Target 16 that addresses consumers ([Business for Nature CBD Position Paper](#)).
- An important element is to emphasize that businesses need to follow a regular approach in measuring negative impacts. Only identified impacts can be reduced, avoided or compensated, therefore regular re-assessment and prioritization of business operations is necessary to avoid foregoing possible reductions of action ([Business for Nature CBD Position Paper](#)).
- We suggest changing ‘report’ for ‘disclose’ as ‘report’ can be understood as internal reporting. There is a strong movement of normalizing and standardizing disclosure and this target should reflect this. While the focus should be on improving decision-making, a standardized mechanism to assess and disclose nature-related risks and dependencies is required to ensure a level playing field and inform investors. As methodologies and metrics for valuation and disclosure are currently being developed, clear guidelines on reporting would be needed. We recommend that Parties recognize the efforts made by the [Science-Based Targets Network for nature](#) (SBTN), to create reporting toolkits for businesses, cities and other organizations, and by the [Taskforce on Nature-related Financial Disclosures](#) (TNFD). Their guidelines for reporting and disclosure will have been tested and agreed before the proposed deadline of 2030, so regulatory measures supporting disclosure are feasible. To accelerate the uptake and application, governments should promote the development of standardized methodologies and metrics, as well as support building capacity within businesses and financial institutions to apply these methodologies and metrics. For example, the European Union is supporting development of sustainability risks standards and encourages natural capital accounting in its Strategy for Financing the Transition to a Sustainable Economy (2021) ([Business for Nature CBD Position Paper](#)).
- Reducing negative impacts by half will not be enough to achieve the mission and vision of the Framework. We will only see the transformation needed if business align all their practices to a nature-positive economy. This target needs to clearly set an ambition level and set the direction of travel that will help mobilize all actors. For supply chains to be sustainable, they need to become deforestation and conversion free, starting immediately, and this should be reflected in an indicator. This would provide a major contribution toward achieving the Framework’s mission and goals ([Business for Nature CBD Position Paper](#)).

Proposed text amendment:

Current text	Suggested amendment
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	Target 15. ensure that all businesses (public and private, large, medium and small) fully integrate biodiversity values into decision making, and regularly assess and report disclose on their dependencies and impacts on biodiversity, from local to global, and progressively reduce negative

<p>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>impacts by at least half and increase positive impacts to align all activities to a nature-positive economy, including by standardizing appropriate and aligned mechanisms, contributing to 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>Clean version</p> <p>Target 15. Ensure that all businesses (public and private, large, medium and small) fully integrate biodiversity values into decision making, and regularly assess and disclose on their dependencies and impacts on biodiversity, from local to global, and reduce negative impacts by at least half and increase positive impacts to align all activities to a nature-positive economy, including by streamlining and standardizing appropriate and aligned mechanisms, contributing to reduce 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>	