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**Ref.: SCBD/OES/DC/KM/88539  
Notification No. 2019-108**

February 3, 2019

Elizabeth Maruma Mrema  
Acting Executive Secretary  
UN Convention on Biological Diversity

**1. Submission of views on possible targets, indicators and baselines for the post-2020 global biodiversity framework and peer review of a document on indicators.**

AND

**2. Submission of views on possible targets and indicators for the post-2020 global biodiversity framework related to the interlinkages and interdependencies between biodiversity and climate change**

Dear Executive Secretary,

On behalf of the undersigned organization I would like to thank you for your invitation to submit views on the zero draft of the Post 2020 Global Biodiversity Framework and the interlinkages and interdependencies between biodiversity and climate change.

### **Introductory remarks**

The unprecedented extent and severity of fires in Australia this summer, which claimed the lives of more than 1 billion animals, killed many people and destroyed the homes and livelihoods of many more, heightens the urgency of addressing the biodiversity and climate crises in an integrated and mutually supportive manner. It is no exaggeration to say that the framework and actions taken between 2020 and 2030 to solve these two existential crises will determine the future of Life on Earth.

With this imperative in mind it is essential that the framework pay far greater attention to the need to protect ecosystems in good condition and restore those that are not to build climate resilience and increase ecosystem integrity and stability. The functional role of biodiversity in ensuring ecosystem integrity and stability must be better reflected in goals and targets. Only by doing so can we minimize the risk of premature release of ecosystem carbon stocks to the atmosphere and reverse the relentless decline in biodiversity.

And the greatest possible impetus **must** be given to encouraging change by 2030. Targets and goals must be front-loaded. The trajectory on biodiversity loss must be reversed by 2030; further fragmentation and damage to primary ecosystems must be prevented and everything possible done to encourage immediate improvements to their conservation management and

climate resilience; support for the rights and livelihoods of indigenous people must be increased; and ecosystem integrity, stability and climate resilience fostered by climate action in NDC's.

Greater focus is also needed on the importance of improving the boundaries, buffers and permeability/connectivity of Protected Areas, all primary ecosystems and other Key Biodiversity Areas and ensuring that traditional management and knowledge is maintained or restored to contribute to biodiversity protection and ecosystem integrity.

Our suggested specific textual edits are appended below. However, we would also like to preface these proposed edits with a few overarching comments on the approach taken in the zero-draft of the post-2020 framework with respect to **offsetting ecosystem loss**.

### **Offsetting Biodiversity and Ecosystem Loss:**

First, the 2030 targets appear to be inconsistent. While the Theory of Change (Section C) and para 10(a) suggest the target is no net loss of ecosystems by 2030, and net increases thereafter, paragraph 12(a)(1) suggests the target should be a net increase in integrity by 2030. Merely achieving no net ecosystem loss over the coming decade, and then achieving “net improvements” (which is not defined) over the subsequent two decades is not sufficiently ambitious given rapidly accelerating climate change, massive decreases in species abundance and rapid increases in the rate of extinctions and threats of extinction. And although the 2030 target in para 12(a)(1) is an improvement relative to the preceding text in paras 5 and 10 it is nonetheless also in need of strengthening. A “net increase” in area, connectivity and integrity does not provide sufficient indication as to whether conservation is progressing to the point where the integrity of those ecosystems is assured.

We also note as a matter of caution that biodiversity offsets are plagued with methodological challenges. What is considered a net gain depends to a significant extent on how the compensation is being measured, and at what scale. Project-level offsetting is highly problematic as it is usually based on exchanging a current loss in biodiversity with avoided loss elsewhere (and/or a speculative future gain), it is not assessed in the context of overarching species or ecosystem level recovery plans, it often fails to consider cumulative impacts and therefore underestimates the level of compensation needed, and is often measured against counterfactuals of ongoing decline, which also leads to underestimates for compensation (see: Kormos R, Kormos CF, Humle T, Lanjouw A, Rainer H, Victurine R, et al. (2014) Great Apes and Biodiversity Offset Projects in Africa: The Case for National Offset Strategies. PLoS ONE 9(11): e111671. <https://doi.org/10.1371/journal.pone.0111671>).

Avoided loss offsets designed to compensate for project-level impacts therefore usually result in continued overall biodiversity declines and claims of having achieved a net gain usually reflects accounting rules rather than the reality on the ground. Framing targets in terms of net gains or losses is therefore problematic: it is better to articulate species and ecosystem recovery goals.

### **Inter-linkages and interdependencies between biodiversity and climate change**

This year will set the trajectory for success or failure on the biodiversity and climate crises.

The biodiversity crisis is so severe it makes economic and ecological sense to tackle both problems together. “Such is the rate of decline that the risks posed by [biodiversity loss](#) should be considered on the same scale as those of climate change.” (IPBES 2018).

Success depends on achieving integrated approaches to solving both crises. Improving the integrity and stability of all ecosystems is essential for biodiversity protection. Crucially it is also important for stable long-term carbon storage and sequestration.

The functional role of biodiversity in underpinning ecosystem integrity and stability is often overlooked or poorly understood by decision makers - particularly in climate policy arenas. Given that ecosystem carbon stocks exceed the stocks in fossil fuels, minimising the risk of premature release of carbon to the atmosphere is critically important **and the highest immediate priority for climate action in land, forests and other ecosystems**. Ensuring the post 2020 CBD framework fosters integrated climate and biodiversity action to protect and restore Earth's most carbon dense and stable ecosystem stocks is thus crucially important for the health of the biosphere and the fate of life on Earth.

The focus in the framework on the impacts of climate change on biodiversity, while understandable, misses the critically important threat to limiting warming to 1.5-2 degrees if Earth's most stable and resilient ecosystems and their carbon stocks are not protected. Just as climate change amplifies the stresses already impacting natural systems, climate change has been and will continue to be exacerbated by biodiversity loss and ecosystem decline. The CBD recognised this at COP 14 in its decision **CBD COP 14.5 when it expressed deep concern about both problems:**

“.....that failing to hold the increase in the global average temperature to well below 2°C above pre-industrial levels would place many species and ecosystems with limited adaptive capacity as well as the people that depend on their functions and services, especially indigenous peoples and local communities and rural women, under very high risk; (and) ..... also that escalating destruction, degradation and fragmentation of ecosystems would reduce the capacity of ecosystems to store carbon and lead to increases in greenhouse gas emissions, reduce the resilience and stability of ecosystems, and make the climate change crisis ever more challenging.”

If you want the UNFCCC to take notice and State Parties to take appropriate integrated action in their NDC's, it is important for the CBD to reflect not just the benefits of improving biodiversity protection and ensuring ecosystem integrity for climate action but also the impact of continued biodiversity loss and ecosystem decline for escalating emissions (and potential tipping points).

Notably, UNFCCC COP 25 also recognised the important linkages between biodiversity loss and climate change in decision **1/CP.25 by underlining:**

“15. ... the essential contribution of nature to addressing climate change and its impacts and the need to address biodiversity loss and climate change in an integrated manner”;

The impact of climate decisions – good or bad – on biodiversity and ecosystem integrity will be heightened by the increasing global focus on and expected resourcing for, climate action in land and forests. **Nature Based Solutions** are being promoted as having the potential to solve 30-37% of the climate mitigation challenge. But not all climate actions in land and forests support biodiversity and ecosystem integrity. Some climate actions based on nature, such as large-scale plantation establishment and power generated by burning forest biomass, have an adverse impact on biodiversity and questionable (plantations) or negative (forest biomass burning) impact on climate change.

Increased awareness and focus is needed on the climate and biodiversity imperative of maintaining and improving the condition, stability and resilience of land, forests and other ecosystems. Doing so is crucial to reduce vulnerability to pests, disease, drought and fire – threats that are already increasing as a result of climate change.

To minimise the risk of failure and maximise the chances of success, climate action in land, forests and other ecosystems must improve the outlook for biodiversity and thus ecosystem integrity, stability and adaptive capacity – not simply do no harm!

Thankfully, there are obvious high priority areas where climate and biodiversity imperatives coincide.

The 2019 IPCC Special Report on Land pointed to the ‘irreplaceability in relevant time frames (2030 and 2050) of carbon dense primary ecosystems (forests, wetlands, peatlands, mangroves, savannah woodlands, etc). All primary ecosystems are irreplaceable in the same time frames for biodiversity. The concept of ‘No net loss ’for primary and many other natural ecosystems and Key Biodiversity Areas is dangerous and delusional!

The same IPCC report pointed to the benefits of restoration activities that restore connectivity, biodiversity and ecological function to buffer and link primary ecosystem core areas; and of encouraging integrated climate mitigation and adaptation action to minimise pressure on land.

Concerns were also expressed by the IPCC about ongoing fragmentation and degradation of primary forests and increasing vulnerability to loss and degradation of other carbon dense ecosystems such as peatlands and wetlands.

There are many other areas in the IPCC Special Report on land that point to opportunities for synergistic action. High priority goals that integrate climate and biodiversity action include:

- Avoiding further fragmentation, loss and degradation of all carbon dense primary ecosystems including intact landscapes, reflecting their critical importance for biodiversity protection, climate mitigation and adaptation;
- Encouraging inclusion in NDC’s of improved conservation management, buffering and reconnection of primary forests and other carbon dense primary ecosystems to increase their resilience, stability and adaptive capacity and deliver robust climate mitigation outcomes;
- Encouraging restoration action through Connectivity Conservation initiatives, ‘pro-forestation’, OECM’s and regeneration of carbon dense ecosystems;
- Supporting the rights and livelihoods of IPLC’s to maintain or improve conservation management in primary and other natural landscapes; and
- Encouraging restoration of agricultural systems based on ‘agro ecological practices ’ to maintain or increase biodiversity in farming landscapes including soil, thereby helping to protect and restore carbon sequestration and storage and water retention and productivity.

Reducing competition for food production is a consistent theme in the IPCC report. This is increasingly important as agricultural production faces increasing pressure associated with biodiversity loss and ecosystem decline (IPBES).

