

Denmark's Youth Delegates to the UN comments on the updated zero draft on the CBD Post-2020 Global Biodiversity Framework

General comments

- **We see with regret that, generally seen, the targets of the updated zero draft are both less ambitious and less concrete than in the original document.** Concrete targets are fundamental for ensuring better implementation and the current biodiversity crisis requires high levels of ambition in order to put nature in the path towards recovery. Therefore, we would like to see an agreement with increased level of specificity in the targets, as well as an ambition that is, at least, at the same level with the Aichi targets.
- **We welcome the inclusion of a ratchet mechanism for securing implementation.** We though highlight the importance of making sure that this is done in an effective manner and that resource mobilization is sufficient for ensuring that developing countries can successfully implement this more ambitious implementation mechanism.
- **We welcome the mention of the importance of intergenerational equity and youth participation,** especially in target 20 and under enabling conditions.

Specific comments

- **Target 2:** We consider that this target needs to be made more specific to clarify that 30% relates both to land and water, in line with the language used in Aichi target 11. Furthermore, it is important to put focus during the negotiation process on ensuring that these areas are designated, managed and reported in a way that puts human rights and the rights of indigenous people at its chore, as well as promotes real biodiversity conservation and restoration.

Therefore we consider that:

- The language of this target should refer to protection of both terrestrial and marine areas;
 - The development of this target in terms of designation, management, and reporting should be closely followed to ensure an effective and socially just target.
- **Target 15:** we welcome the target of eliminating unsustainable forms of consumption. However, sustainable alternatives are in many cases not a viable option for people with lower resources, such as youth, marginalised groups, and indigenous and rural communities. Introducing the concept of accessibility (such as economic accessibility) in this target is important to remark the importance of the sustainable transition being socially just.

Therefore we think the target should be supplemented with:

- “By 2030, eliminate unsustainable consumption patterns **and make sustainable alternatives accessible for all**, ensuring people everywhere understand and appreciate the value [...]”.

- **Target 17:** we regret that this target has now become less ambitious than in the original document and Aichi target 3. After the GBO5 and the expert panel on resource mobilization have remarked the importance of eliminating or redirecting harmful subsidies, we believe that this target should, as a minimum, include the elimination of the most harmful subsidies. Eliminating the most harmful subsidies does not only benefit biodiversity directly, but also makes the goals of the framework more economically achievable.

Therefore we propose to:

- Change target 17 to: “By 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including **eliminating** the most harmful subsidies, [...]”; An alternative possibility is that the “X” value inside the square bracket in the updated version of the framework is designated as “100%”.
 - Change point F.a.ii to: “**Eliminating** or redirecting resources causing harm to biodiversity”.
- **Target 19:** education plays an important role in securing the implementation of the framework’s targets and goals. Therefore, we would like to see a higher level of ambition in the implementation of biodiversity in education curricula. While there is a mention of this under point F.c.ii, we would like to see an increase of ambitions by explicitly integrating this concept under one of the targets.

Therefore we propose to add to the target:

- “By 2030, ensure that quality information, including traditional knowledge, is available to decision makers and public for the effective management of biodiversity through promoting awareness, education and research. **Biodiversity should be integrated in education curricula at all levels, where relevant, in cooperation with students and teachers, as well as promoted through non-formal and informal education.**”
- **Human rights:** we consider that the framework lacks focus on human rights. This is especially important as today many activists around the world working with biodiversity lose their lives given human rights breaches. We consider that ambitions need to be raised in this aspect and that the framework should protect people against such breaches.

Therefore we propose:

- A new target should be added dedicated to securing that biodiversity activists are not exposed to human rights breaches.