

**Letter to the Co-Chairs of the Open-Ended Working Group on the Post-2020 GBF, concerning the proposal for a new section on ‘Guidance for the implementation of the framework’**

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11<sup>th</sup> March 2022

Dear Co-Chairs

We are writing to express our concern about, and opposition to, the proposal included in the document *‘Reflections by the Co-Chairs following the first session of the third meeting of the working groups on the post-2020 Global Biodiversity Framework’* concerning the inclusion of a new section on **guidance for the implementation of the framework**. We do not wish to address the specific draft text proposed for this guidance, but the very principle of it.

It is stated that the intention of the proposal is to *“avoid overburdening the text and to ensure that the post-2020 framework remains clear, concise and communicable.”* As we understand it, this will involve removing all the “cross cutting issues” - actually important principles and standards, such as rights-based approaches, gender equality, gender-responsive approaches, empowerment of women and girls and youth and Indigenous Peoples and local communities – from the operative parts of the text, including the vision, Goals and specific Targets, and replacing them with one general set of guidance which would apply across the entire document.

In our view, this would serve to downgrade these important “cross-cutting issues”/principles and standards to a weaker status than if they are included in the operative texts. It also raises the prospect that important points of principle would be removed altogether. The existing references to cross-cutting issues are generally weak and need strengthening, not removing.

Without endorsing at all the current draft targets, we believe it is critically important that the principles and standards of equity, Indigenous Peoples’ and other relevant rights remain firmly attached to any such goals or targets, as well as their indicators, in a way appropriate to each. We do not believe this can be achieved through generic guidance. We believe Parties will be less likely to pursue, for example, the equity conditions of goals and targets if the wording concerning equity is not included within them.

We also question whether all or major parts of Targets 20 and 21 might disappear altogether because these targets are principally concerned with “cross cutting issues”, especially with regard to rights and Indigenous Peoples and local communities.

Whilst we appreciate the need for the GBF to be communicable, we also believe this should not drive changes in the document rendering it even more lacking in key principles and standards on rights and equity. As is typically done with major reports such as those from IPBES, a ‘policy-makers’ summary of the GBF could be provided for simplicity and ease of understanding – but leaving the actual negotiated texts fully intact.

We thank you for considering these issues.

Sincerely

AbibiNsroma Foundation, Ghana - Nana Kenneth Amoateng

Avaaz - Oscar Soria

Econexus - Helena Paul

Ecoropa - Christine von Weizsäcker

Environmental Paper Network China - Wen Bo

ETC Group - Ronnie Hall

FIAN International - Philip Seufert

Global Forest Coalition - Simone Lovera

Iniciativa Amotocodie, Paraguay - Miguel Lovera

Initiative for Equality - Dr. Deborah S. Rogers

Landelijk Netwerk Bossen- en Bomenbescherming, Netherlands - Marjan Houpt

Minority Rights Group - Joshua Castellino

Noble Delta Women for Peace and Development International - Caroline Usikpedo

O le Siosiomaga Society Inc., Samoa - Fiu Mata'ese Elisara-La'ulu

Population Matters - Andrew Howard

Rainforest Foundation UK - Joe Eisen

Rainforest Foundation Norway – Silvana Bustillo Restrepo

Seeds Action Network, Germany - Rüdiger Stegemann

Survival International – Fiore Longo

The Development Institute - Ken Kinney

Third World Network – Lim Li Ching

Water Justice and Gender - Juana Vera-Delgado

Women Engaged for a Common Future - Sascha Gabizon

Zambia Alliance for Agroecology and Biodiversity - Frances Davies