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## TRAFFIC Recommendations on the First Draft of the post-2020 Global Biodiversity Framework

March 2022

TRAFFIC, as a global wildlife trade specialist, welcomes the publication of the first draft of the Post-2020 Global Biodiversity Framework as a major step towards achieving a critical global biodiversity agreement.

- TRAFFIC strongly supports the recognition that the Framework gives to addressing a key driver of biodiversity decline - illegal and unsustainable trade in wild species, and to the contribution of sustainable and legal wildlife trade to conservation and people. This is reflected in Targets 5 and 9. Although closely related, we believe that these two targets should not, however, be combined.
- It is encouraging to see that the Target 5 language explicitly covers the aspects of harvesting, trade and use of wild species. It is important that ongoing negotiations on the targets fully take into account all wild species of fauna, flora and fungi, and encourage joined-up thinking around the systemic changes required to both reduce illegal and unsustainable trade and promote sustainable practices to reduce the threat across the various species.
- It is also encouraging to see the reference made to 'safe to human health' in the draft text of Target 5. However, more ambition and coherence is needed in the Framework around the commitments on the nexus of health and biodiversity and effective implementation of the One Health approach. TRAFFIC recommends that clear indicators are developed that reflect the priorities and milestones identified in the Draft Global Action Plan for Biodiversity and Health (CBD/SBSTTA/24/9).
- Ensuring the sustainable use of biodiversity, in particular of wild species, provides a direct contribution to reducing the threats of unsustainable and/or illegal use, including for commercial and international trade. TRAFFIC has proposed a process for the development of the headline indicator for Target 5 to measure the sustainability of use of wild species by 2030.
- There are other targets in the Framework where it is important for Parties to recognize the contribution of and implications for sustainable use of wild species. These include Target 1, in relation to how integrated biodiversity-inclusive spatial planning can provide species and products in use and trade; Target 4 on active management actions that can also support sustainable use; Target 6, on managing invasives where introduced species provide valuable livelihood and economic benefits; as well as Target 7 on pollution and Target 11 on water quality from aquaculture and loss of coastal mangrove ecosystems that can affect livelihoods, sustainability and economic and other benefits to humans.
- Both Targets 5 and 9 are very ambitious and will require substantial resources for effective implementation. A clearly measurable monitoring framework is essential to measure progress on the implementation of these targets, including robust headline, component and complementary indicators. It is also important that the GBF indicators are coherent and applicable with indicators across other biodiversity Conventions, for example, the CITES Strategic Vision: 2021-2030.
- The monitoring framework will require further consideration to ensure that the indicators adequately measure progress. In many cases, data on use of species, domestically and along the supply chain to the markets, is lacking and therefore, it would be important to develop a framework that would encourage improved knowledge, information and data on use of species and the sustainability of it, including to underpin management decisions to ensure sustainable use of species. TRAFFIC is looking forward to working with Parties and through the Biodiversity Indicators Partnership (BIP) to further develop and refine the monitoring framework.

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- The monitoring and implementation elements of Target 10 concerning Forests need to be strengthened and include reference to tools and approaches developed specifically to address the sustainable production of non-wood products, such as FairWild Standard principles, and to ensure that forestry operations and management plans are inclusive of non-wood products.
- Targets 14, 15 and 16 are key elements of the Framework, and it will be necessary for these to include recognition of the contribution of legal and sustainable trade in wildlife (across various taxa) to halting the loss of biodiversity. In relation to sustainable consumption practices, this could include the need for reporting on compliance with responsible trade and production practices; financial institutions divesting investments from activities leading to illegal and unsustainable trade in wildlife and encouraging biodiversity-friendly investments in sustainable production practices; as well as integrating the value of wildlife trade in natural capital accounting and other relevant policies.
- With regard to Target 16, the text of the target and the accompanying indicators appear to focus only on waste and overconsumption of food and 'materials', which may not adequately reflect the need for reducing unsustainable consumption of many forms of wildlife resources. A more appropriate (and measurable) target and indicator for these could be changes in demand that reflect responsible consumption (e.g. reduction in demand for illegal and unsustainable harvested wild species and increased demand for sustainably harvested wildlife resources as an alternative).

Some specific recommendations to strengthen the Framework are outlined below.

**Target 5: Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.**

TRAFFIC does not propose any changes to the language of the target, supporting the recognition that the draft GBF gives to addressing a key driver of biodiversity decline and strong alignment with the second Objective of the CBD on sustainable use of biodiversity.

However, the target appears to be very ambitious, considering the scale of the current harvesting, use and trade of wild species, as indicated, e.g. by the ongoing IPBES Sustainable Use assessment. To demonstrate the scale involved, the CITES Appendices alone regulate international trade in over 38,700 species (roughly 5,950 species of animals and 32,800 species of plants); approximately 26,000 of plant species are in well-documented use for medicinal purposes, and around 1,000 of those in international trade are wild harvested. In addition, a large number of species in use and trade are not listed in the CITES Appendices and are used domestically.

Enabling the implementation of such ambition, while necessary, will require substantial resourcing of efforts globally and the establishment of a robust monitoring framework and capacities.

**Update against Doc CBD/WG2020/3/6:** Regarding the proposed alternative text of *Eliminate unsustainable, illegal and unsafe harvesting, trade and use of wild species*, TRAFFIC draws the attention of Parties to the absence of the baselines regarding the unsustainable, illegal or unsafe practices.

It is recognized that the reference to unsustainable, illegal or unsafe harvesting, trade and use' is relevant to the transformative action to reduce threats to biodiversity. However, we suggest that the original framing of the Target of the 1st draft was aimed supporting the second Objective of the CBD (sustainable use of biodiversity). In our opinion, Target 5 should not be reframed to focus exclusively on over-exploitation. If the language of Target is revised, it is important to address both **ensuring sustainable, legal, and healthy harvesting, use, and trade, as well as eliminating illegal, unsustainable, and unhealthy harvesting, use, and trade**. This should also be apparent in the relevant headline, component and complementary indicators.

TRAFFIC is also supportive of **developing a quantifiable target that is SMART**. In support of this, TRAFFIC has proposed a **new headline indicator (needs to be developed), '5.0.1 Sustainable Use of Wild Species'**. It is available in the relevant information document. We welcome Parties and other stakeholders to engage in the development process.

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**Target 9: Ensure benefits, including nutrition, food security, medicines, and livelihoods for people, especially for the most vulnerable, through sustainable management of wild terrestrial, freshwater and marine species and protecting customary sustainable use by indigenous peoples and local communities**

TRAFFIC welcomes this target and does not propose any changes to the language of the target.

However, **more work needs to be done on the proposed headline and component indicators** and can provide suggestions for consideration. For example, the indicator on **national environmental-economic accounts of benefits from the use of wild species** should refer to *sustainable* use of wild species. The **Biodiversity for Food and Medicine indicator** developed as part of the BIP may also provide an appropriate headline indicator for this target: <https://www.traffic.org/site/assets/files/7300/biodiversity-for-food-and-medicine-english.pdf>.

The component indicator referring to the **number of people using wild resources may also be misinterpreted** to encourage people to depend increasingly on wild resources and should perhaps refer to **'number of people benefitting from verifiably sustainable management practices of wild species of fauna and flora'** instead. This indicator could be measured through a combination of metrics proposed for Target 13 (*Numbers of users that have shared benefits from the utilization of genetic resources and/or traditional knowledge associated with genetic resources with the providers of the resources and/or knowledge*), with the focus on **biological resources**, rather than genetic resources.

This indicator could also measure the utilization of implementation of tools that collate information on measurable benefits from sustainable wild use/trade practices, including the [FairWild Standard](#) (for equitable, sustainable trade in wild plants, fungi and lichen, as highlighted in [SBSTTA-24-INF-20-en](#)), the BioTrade Principles, and others. Specific to the FairWild Standard implementation, the focus could be on: Number of people harvesting and trading wild plant, fungi and lichen products benefitting from the Premium prices and Premium Fund. Similar proxy indicators can be consolidated from other taxonomic groups of species in terms of the equitable trade in biological resources.

**It is also not clear what is meant by 'traditional employment' in the component indicator referring to "percentage of the population in traditional employment" and how this indicator is linked to securing benefits from sustainable management of wild species.**

**Update against Doc CBD/WG2020/3/6:** Regarding the proposed alternative language of *Ensure the sustainable use of species (including fisheries) thereby providing benefits [including nutrition, food security, medicines, and livelihoods], to [all] people, especially to the most vulnerable[while safeguarding the sustainable customary use by indigenous peoples and local communities]*.

TRAFFIC believes that it is crucial that the benefits from **the use of wild species** are clearly articulated in this target. Millions of people around the world are dependent on the use of wild species for health, nutrition and livelihoods, and their sustainable use provides the important contribution to these needs, as well as provide important inputs into the uses of wild species and products in consumer goods. It is paramount to ensure the use of wild species is sustainable and benefits people in an equitable way. **We thereby suggest that 'wild' be added before 'species' in the target.**

Regarding the relevant questions for consideration by stakeholders and Parties, TRAFFIC believes:

- That target 9 should refer to the exploitation of marine species and fisheries, as well as other wild terrestrial and freshwater fauna, flora and fungi species.
- That targets 5 and 9 should not be merged. While there is an intrinsic connection between these targets concerning the subject of the use of wild species, they serve distinctive purposes of addressing the threats to biodiversity from illegal and unsustainable use (target 5) and ensuring benefits to people (target 9).

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**Target 10: Ensure all areas under agriculture, aquaculture and forestry are managed sustainably, in particular through the conservation and sustainable use of biodiversity, increasing the productivity and resilience of these production systems.**

Under the component on forestry, it is noted that **where forest management plans exist, they are frequently limited to ensuring the sustained production of wood and lack sufficient attention to the sustainable production of non-wood products and ecosystem services and the maintenance of social and environmental values.** TRAFFIC agrees with this observation and proposes the inclusion of clear monitoring of the tools developed specifically for the verification of the sustainable production of non-wood products, such as the FairWild Standard, under the component indicators for this target.

TRAFFIC also recommends that the focus on forestry includes operations by the forestry and related agencies to ensure the relevant systems, procedures and institutions are in place to manage forests sustainably.

**Update against Doc CBD/WG2020/3/6:** TRAFFIC's position is as above.

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

**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 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.**

**Target 16: Ensure that people are encouraged and enabled to make responsible choices and have access to relevant information and alternatives, taking into account cultural preferences, to reduce by at least half the waste and, where relevant the overconsumption of food and other materials.**

It is necessary for these targets to include recognition of the contribution of legal and sustainable trade in wildlife (across various taxa) to halting biodiversity loss. Areas to consider include:

- The integration of wildlife trade data in the measurement of values of biodiversity and integrating these in natural capital accounts, as well as aligning financial flows to nature positive outcomes and managing the risks associated with the trade in wildlife (such as the divestment from businesses and operations involved in illicit and unsustainable trade in wild species, and investment in supply chains that demonstrate sustainable, legal and safe trade practices) (Target 14),
- Reforming economic sectors towards sustainable practices along the supply chains for wildlife trade by eliminating the involvement in the illegal and unsustainable trade, and promoting the uptake of responsible practices, in sectors as diverse as global timber trade, fisheries, and wild plant resources, as well as enabling sectors such as finance, transport, online commerce, tourism and others (Target 15),
- The contribution of wild natural resources (such as timber, fisheries, wild plant ingredients), as well as efforts to reduce the consumption and demand for illegally traded wild species, to undertaking measurable steps towards sustainable consumption lifestyles (Target 16).
- With regard to Target 16, the first draft removed wording on eliminating "unsustainable consumption patterns" from the zero draft. While it can be argued that the current wording on making "responsible choices" can be interpreted to include avoiding unsustainable consumption, the text of the target and indicators appear to focus only on waste and overconsumption of food and 'materials', which may not adequately reflect the need for reducing unsustainable consumption of many forms of wildlife resources. A more appropriate (and measurable) target and indicator for these could be changes in demand that reflect responsible consumption (e.g. reduction in demand for illegal and unsustainable harvested wild species and increased demand for sustainably harvested wildlife resources as an alternative).

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Update against Doc CBD/WG2020/3/6: With regard to the proposed change to the language of Target 16 to include the reference to 'Sustainable consumption' rather than 'responsible choices', TRAFFIC is supportive of this change.

TRAFFIC remains concerned regarding the absence of clear mentioning of the wild species in trade and use referenced in Targets 14 to 16.

For more information, please contact **Sabri Zain, Director of Policy**, e-mail [Sabri.Zain@traffic.org](mailto:Sabri.Zain@traffic.org)