



February 9, 2024

The Honourable Steven Guilbeault  
Minister of Environment and Climate Change  
[ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

**Re: Canada's 2030 Biodiversity Strategy – Milestone Document**

Dear Minister Guilbeault,

Thank you for the opportunity to provide feedback on the Milestone Document for Canada's 2030 Biodiversity Strategy. Overall, we continue to be encouraged by Canada's leadership role in what we hope will be a turning point for nature and society. The overall framing now recognizes that genuine transformation is needed to achieve the vision of the Kunming-Montreal Global Biodiversity Framework (KMGBF) of harmonious coexistence with nature. We applaud you and your team for advancing this critical document, recognizing that more targeted actions are required to meet the 2030 goals.

Our comments on the Milestone Document include **10 cross-cutting recommendations to advance domestic implementation of the KMGBF (Attachment 1)**. These focus on broad actions that will support implementation of Canada's 2030 Biodiversity strategy in its entirety that effectively transcend the targets (which are designed to work together) and promote a whole-of-government approach.

**Wildlife Conservation Society Canada's 10 cross-cutting recommendations to advance Canada's 2030 Biodiversity Strategy**

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|---|---|
| <b>1: Policy coherence</b>                                  | <b>6: Halt and reverse biodiversity decline</b>             |
| <b>2: Ambitious, transformative &amp; connected actions</b> | <b>7: One Health</b>  |
| <b>3: Integrating the pillars throughout the strategy</b>   | <b>8: Defining what we mean</b>                             |
| <b>4: Specific national targets</b>                         | <b>9: Better understanding the barriers</b>                 |
| <b>5: Reflecting on Canada's 2020 Report</b>                | <b>10: Regular reporting and active adaptive management</b> |

We appreciate that the Milestone Document reflects only existing initiatives and investments. Our comments also include **specific target by target recommendations** to enhance existing approaches, ideas for new, ambitious, and transformative actions, and recommendations on the indicators and monitoring to support implementation of Canada's 2030 Biodiversity Strategy (**Attachment 2**).

Our recommendations build on our [July submission](#), and complement a joint submission we have prepared with other Canadian civil society organizations. They are further informed by direct discussions with your staff.

As scientists specializing in conservation ecology, species at risk, land use planning, impact assessment, ecosystem science, and biodiversity at Wildlife Conservation Society (WCS) Canada, we are pleased to support Canada's efforts in developing an ambitious and transformative 2030 Biodiversity Strategy. WCS Canada programs, including Key Biodiversity Areas and our work with Indigenous communities in high integrity ecosystems, are well-aligned to support effective implementation of the strategy. Our perspectives are strengthened by our close relationship with WCS global programs in international policy and field-based conservation work in more than 60 countries around the world. Our memberships on the Canadian delegations to the OEWG and COP15 meetings (JCR), on the federal Nature Advisory Committee (DTK), Ontario Biodiversity and Great Lakes indicators technical committees (DTK), and Nature-Based Climate Solutions Advisory Committee (CRH) further contribute to our extensive familiarity with the subject matter.

In closing, we thank you for the opportunity to provide input. We are encouraged by the federal government's leadership and dedication towards implementing the Global Biodiversity Framework and have high hopes that this will lead to the development of a transformational national strategy, including a clear set of actions and an effective monitoring and reporting framework. We look forward to the opportunity to collaborate with you and your team in developing the final strategy and our future partnerships to implement ambitious and transformative actions that halt and reverse the loss of nature in Canada.

Yours sincerely,

Daniel Kraus, Director, National Conservation  
Justina Ray, PhD, President & Senior Scientist  
Ciara Raudsepp-Hearne, PhD, Director, Key Biodiversity Areas  
Cheyenne MacDonald, L'nua'tikete'w/Indigenous Relations Associate  
William D. Halliday, PhD, Conservation Scientist, Arctic Acoustics Program Leadership  
Stephen Insley, PhD, Director of Arctic Conservation

cc:

Tara Shannon, Assistant Deputy Minister, Canadian Wildlife Service: [Tara.Shannon@ec.gc.ca](mailto:Tara.Shannon@ec.gc.ca)  
Kelly Torck, Director General, Biodiversity Policy and Partnerships Directorate: [Kelly.Torck@ec.gc.ca](mailto:Kelly.Torck@ec.gc.ca)  
Basile van Havre, Director General: [Basile.VanHavre@ec.gc.ca](mailto:Basile.VanHavre@ec.gc.ca)  
Martin Lajoie, Director, National Biodiversity Policy: [Martin.Lajoie@ec.gc.ca](mailto:Martin.Lajoie@ec.gc.ca)  
Sarah Kalff, Manager, GCE : [Sarah.Kalff@ec.gc.ca](mailto:Sarah.Kalff@ec.gc.ca)  
Lisa Twolan, A/Manager, GCE: [Lisa.Twolan@ec.gc.ca](mailto:Lisa.Twolan@ec.gc.ca)  
[nature2030@ec.gc.ca](mailto:nature2030@ec.gc.ca)

**Attachment 1:  
Recommendations on 10 cross-cutting themes to advance Canada's 2030 Biodiversity Strategy  
February 2024**

These 10 cross-cutting recommendations focus on broader actions that will support implementation of Canada's 2030 Biodiversity Strategy in its entirety.

**1: Policy coherence**

As recognized in the Milestone Document, many various elements of biodiversity are scattered throughout governments, and in no jurisdiction in Canada are they conscientiously organized in any particular area where they can receive strategic focus. While biodiversity is exclusively within ECCC's mandate, it's also a "horizontal" file, with elements of the portfolio scattered in many different departments. For example, programs like fisheries management at DFO, forest conservation research at CFS, and ecological connectivity now at Parks Canada. This situation underscores the need for central coordination mechanisms to maximize policy coherence, including (but not limited to) climate and biodiversity portfolios. Many of the following actions could be integrated into the pillar actions we suggested below in #3.

- Announce a decision to create a new federal department called 'Biodiversity Conservation Canada'. This would help drive biodiversity conservation policy cohesion across government, fuse disparate programs, support ecosystem approaches, and channel resources to more effectively implement the 2030 Strategy and support comprehensive and meaningful reporting. A new department in parallel to ECCC would be formed from most (if not all) elements of the CWS, the fish and protected areas mandates of DFO, the Forest Service, Parks Canada, and parts of the CFIA relevant to wildlife/One Health/ invasive species. This would fuse programs that are currently fractured, conflicting, and competitive. For this to work, it must be accompanied by central coordination mechanisms to maximize policy coherence, including (but not limited to) climate and biodiversity portfolios.
- Ensure the current direction to shift the climate lens in the PCO to an Integrated Climate and Biodiversity Lens continues and apply this to federal policy, decision making and budgeting (domestically and internationally) to enable consideration of implications to biodiversity goals and targets are considered early in the decision-making process. This Integrated Climate and Nature Lens should be part of the Impacts Reports in Federal Budgets (supporting the Pillar: Ensuring a whole of government approach).
- Develop an overarching nature-positive mitigation hierarchy policy housed in a central agency like the PCO to serve as one framework to mainstream biodiversity considerations across federal government departments, including all biodiversity and climate offset policies in all departments (including Fisheries and Oceans Canada) to ensure they are used as a last resort, and only to address impacts that cannot be avoided or mitigated.
- Coordinate and align the Nationally Determined Contribution (under UNFCCC) with Canada's 2030 Biodiversity Strategy.
- Create a formal governance/coordinating mechanism that includes federal, provincial, territorial and Indigenous governments and organizations and civil society, building on the Pathway to Canada Target One model. Clarify how this group and the Nature Advisory Committee can be coordinated. This group should develop standards for terms and tools that are used and understood across all provinces/territories (e.g., Key Biodiversity Areas, OECMs).

- Direct all federal ministers through their mandate letters to help deliver on Canada's Biodiversity Strategy, similar to what has been done for goals related to climate change, reconciliation with Indigenous Peoples, and gender equity. Be specific about responsibility for targets as a means to achieve policy coherence. Conferring specific policy direction and responsibility will be particularly important for addressing threats to biodiversity where activities governed by other departments are drivers of biodiversity loss (e.g., harmful subsidies (T 18), pollution (T7), management/use of wild species (T9), wildlife trade (T5)) (supporting the Pillar: Ensuring a whole of government approach).

## **2: Ambitious, transformative, & connected actions**

We understand that the Milestone Document is a framing document and does not propose new initiatives and investments. Nevertheless, considerably more novel and even experimental actions are needed to meet the goals and targets of the strategy.

- Each target in the final draft of the strategy should be subjected to a 'pillar test' to ensure each pillar is integrated into the actions, or the broader actions needed to support each pillar.
- There should be at least 2-3 clear, new and ambitious actions that are highlighted for each target.
- Many targets still do not include text that recognizes the need for transformative change and sounds like business as usual. A brief section or sentence for each target should address the fundamental question of what needs to change.
- The Milestone Document recognizes that many of the targets are connected, and these linkages are generally recognized under each target. Mapping these connections would be helpful to show the holistic perspective of Strategy implementation and the need to coordinate actions. The [IUCN Global Species Action Plan](#) is a helpful model to show linkages and how the targets, mission and pillars of Canada's 2030 Biodiversity Strategy could be depicted.

## **3: Integrating the pillars throughout the strategy**

The Milestone Document highlights that the pillars are intended to be woven through the document, but there is a need to have additional detail beyond the current description to how they will be integrated and implemented:

- Clearly define each pillar and articulate its role as a 'way of doing' and that they will transcend all targets.
- These pillars will all require cross-cutting actions that transcend many targets. We suggest adding 2-3 of these actions to each pillar. This will highlight those actions that are essential for system changes. For example, ensuring a whole of government approach would be supported by implementing the actions we suggested under policy coherence above.
- There are three important 'ways of doing' pillars that should be integrated in the Strategy:
  - One Health is an emerging approach to solving complex, multidisciplinary problems (see #7 below), and an [increasing priority for the Government of Canada](#) led by Public Health Canada. One Health should be its own pillar or integrated with 'Applying an ecosystem and One Health approach and holistic perspectives'.
  - Active adaptive management supports regular reporting and modifying approaches (see #10 below). This can be integrated into: 'Sharing and learning from the best available science and knowledge' and highlight adaptive management and regular reporting in the text.

- To achieve the goal of halting and reversing the loss of nature, approaches that only limit harm, or strive for no net loss must be replaced with a 'nature positive' way of doing. Adding nature positive as an overall approach supports all the targets and directly speaks to the Strategy's vision by changing the collective relationship we have with nature.

#### 4: Specific national targets

While the preamble to the document sets the stage of the Strategy, the targets will need both greater specificity and coordination. It is evident from the draft that each target was separately conceived, which not only results in inconsistencies between targets, but misses opportunities for alignment of actions. More detail for each will help ensure that the targets are not open for interpretation and support future monitoring and reporting. The following actions will strengthen and clarify each target, as well as their interactions:

- Integrate the pillars deliberately throughout the targets (see #3)
- Match the short name of the target with the short name used by the CBD (for example, Target 1 in the Milestone document is 'Spatial planning and effective management', but in CBD the shortened name is 'Plan and Manage all Areas To Reduce Biodiversity Loss' (see <https://www.cbd.int/gbf/targets/>). The latter is a more accurate representation of the intent of the target.
- Replace 'What we are aiming for in 2030' to 'Canada 2030 Target' and provide a concise target statement of what will be achieved. This clarity will be needed to measure future progress.
- Follow the target statement with a section on '*Target x in the Canadian context*'. The Milestone Document has important contextual information for each target that can be consolidated under this heading.
- The most important section will be the actions. For clarity each target can be divided between the current initiatives already identified in the Milestone Document, and future actions where proposed new initiatives can be identified.
- Include the indicators in each target description. It will also be helpful to identify if the current suite of headline and domestic indicators is sufficient to track and report on the target.

#### 5: Reflecting on Canada's 2020 Report

It would be useful and important to clarify the current biodiversity baseline from which 2030 progress will be measured. Canada's 2020 Biodiversity Strategy did not fully encompass the Aichi Targets and the lack of specificity in the national targets generally resulted in reporting that was largely narrative. Nevertheless, the Final Report for the 2020 Biodiversity Goals and Targets contributes to our understanding of our starting point, and provides one means to identify and justify where greater ambition, attention, and resources are required. This reflection on the effectiveness of our conservation responses also sets the stage for an adaptive management approach to Canada's 2030 Biodiversity Strategy. For example, the three targets that were reported as not met in the Final Report for the 2020 Biodiversity Goals and Targets: water pollution, sustainable marine harvests, and threatened species, should be highlighted. And while new actions are needed for all targets, these three should be carefully examined to ensure that new and transformative approaches are proposed. We have provided specific new actions for these targets, particularly threatened species, in Attachment 2.

## 6: Halt and reverse biodiversity decline

The Milestone Document highlights the need to halt and reverse the loss of nature. But it also states, 'When we halt and reverse biodiversity loss, the bare minimum is no net loss of biodiversity, moving towards achieving net gain overall.' Our recommendations below can be integrated with targets actions for a new 'nature positive pillar' (see #3 above) or Targets 1-4.

- Develop an overarching nature-positive mitigation hierarchy policy housed in a central agency like the PCO (see #1).
- Increase attention to effective management of cumulative impacts, including effective design and implementation of regional and strategic assessments across Canada to plan the pace and scale of development and land use change.
- Key Biodiversity Areas (KBAs) are the most critical places for halting biodiversity loss. Integrate KBAs into impact assessment processes, and work with the private sector to avoid or minimize impacts on KBAs, adapting international guidelines on [Business and KBAs](#) to Canada.

## 7: One Health

One Health is an important and emerging concept in [federal](#), provincial, and regional governments and organizations that enables transdisciplinary approaches to solving complex problems that intersect human, animal, and environmental health. Although One Health is mentioned in the Milestone Document, it is not defined or explained, or positioned as an approach. One Health is beginning to be adopted by provinces (e.g., Ontario Ministry of Agriculture, Food and Rural Affairs has adopted a One Health approach to designing and implementing programs, policies and regulation, working with partners) and may offer a uniting 'boundary object' to engage provincial partners in biodiversity conservation.

- The current section in the introduction on 'Nature and health' should be retitled to 'One Health' and One Health should be defined with reference to the [Berlin Principles](#). The current text on the Quality of Life (QoL) Framework for Canada could be integrated into this section. The QoL outlines a rationale and approach for adopting a quality-of-life approach to government decision-making and budgets in Canada, which makes clear the role of biodiversity for human health and wellbeing, and the functioning and sustainability of human societies. This would foster conditions for a One Health approach.
- Add One Health as a pillar (see #3). While 'whole-of society' and 'holistic perspectives' touch on One Health, adding it as a pillar provides a transformative approach that unites the other pillars. The following pillar actions would support a One Health approach in Canada:
  - Embrace the strategic recommendations of the Royal Society of Canada's One Health Working Group. These recommendations include establishing a One Health Council to develop, coordinate, and implement a One Health Action Plan for Canada, and developing and implementing an Indigenous Engagement and Knowledge Policy Framework for One Health.
  - While Public Health Canada is embracing One Health, enhanced investments in wildlife health are still required as a key element of the National Biodiversity Strategy (Canada lags behind other nations). This entails fully funding and implementing the Pan-Canadian Wildlife Health framework to foster strong, shared leadership in protecting and promoting wildlife health, preventing, and controlling wildlife diseases, and ensuring food safety for Canadians who rely on wildlife as part of their diet.
  - Include health-related indicators in the monitoring framework for Canada's 2030 Biodiversity Strategy. Ensure health metrics are included in monitoring and implementation

of the National Biodiversity Strategy, and that the health benefits of biodiversity protection are explicitly recognized and identified.

### **8: Defining what we mean**

Canada's 2030 Strategy will include new targets and approaches and defining key elements will support implementation and ensure that there are no future interpretations that limit action and ambition.

- The strategy should include a glossary of terms including, but not limited to 'areas of high biodiversity importance' (Target 1), ecosystems of high ecological integrity (Target 1), participatory, integrated biodiversity inclusive spatial planning (Target 1), and 'effective restoration' (Target 2). These definitions should be based on global standards (e.g., IUCN).

### **9: Better understanding the barriers**

The Milestone Document recognizes the need for transformation and *'require us to address the challenges that have held us back, rethink the paradigms and systems that led us to this crisis'* and *'We have a wide range of existing initiatives, strategies, tools (including legislation), and knowledge available, but these have been insufficient in halting and reversing biodiversity loss to date'*. While these challenges to transformative biodiversity conservation are generally known, transformative approaches to implement the 2030 Biodiversity Strategy would be supported by clearly articulating these barriers and the systems that have led us to our current crises and continuing to formulate new approaches.

- We encourage the federal government to convene a multi-disciplinary working group to better understand the systems and paradigms that are barriers to biodiversity conservation and the vision of Canada's 2030 Biodiversity Strategy. This will require a deeper examination and clarity of past and current system barriers that have impeded conservation. A 'horizon scan' would also support the development of novel and transformative approaches to support implementation of the Strategy.

### **10: Regular reporting and active adaptive management**

An effective strategy needs to have a commitment to regular reporting and use that reporting to adapt actions and approaches. Adaptive management should be added as a component to the pillar on 'Using the best available science and knowledge' (see #3 above). We have also provided comprehensive comments on the indicators for each target including Target 21 (Attachment 2), and the overall framing of the Domestic Biodiversity Monitoring Framework could be strengthened by:

- Adding a commitment to regular reporting and adaptive management in the section 'Measuring our progress'. This section should be more than just monitoring, but sharing, learning, and adapting.
- Creating a mechanism for review and adaptation of the 2030 Biodiversity Strategy.
- In addition to traditional biodiversity reporting, social scientists and behavior change experts should be engaged to develop new approaches to messaging the importance of biodiversity conservation to Canadians.
- A commitment to a biennial survey of Canadians on nature value and perspectives. These results should be integrated into Canada's domestic monitoring framework and shared with the public.

## Attachment 2: WCS Canada comments on select targets and indicators

### TARGETS 1-8: REDUCING THREATS TO BIODIVERSITY

#### Target 1: Plan and Manage all Areas To Reduce Biodiversity Loss

*Ensure that all areas are under participatory integrated biodiversity inclusive spatial planning and/or effective management processes addressing land and sea use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities.*

#### Recommendations on Target 1 actions:

- Provide long-term financial support for Indigenous-led or co-led regional spatial planning initiatives, including capacity support for Indigenous nations and communities to prepare to engage in planning processes and scientific and technical support, where appropriate.
- Ensure federal funding flowing to provinces and territories through Nature Agreements is conditional on their commitment to ambitious, measurable contributions to meeting Targets 1, 2 and 3, co-developed with Indigenous Peoples, with clear accountability mechanisms.
- Inventory, map, and track spatial planning exercises across Canada through a reinvigorated Pathway process. Identify regional spatial gaps and planning processes that do not meet the standard of ‘participatory integrated biodiversity inclusive’.
- Implement new funding programs to a) support gaps in participatory integrated biodiversity inclusive spatial planning, and b) to fund the conservation of areas of high biodiversity importance. These should focus on Indigenous-led initiatives and include creating new funding programs directed to areas of high biodiversity importance with multiple species at risk.
- Support and finalize the identification of terrestrial, freshwater, and marine Key Biodiversity Areas (KBAs) across Canada and continued updates and maintenance of the KBA Canada Registry. Continue to fund and support the KBA registry in providing information to governments, communities, scientists, and land use planners to support conservation and sustainable development.
- Continue to explore how Indigenous knowledge can contribute to National Key Biodiversity Areas criteria.
- Through the KBA Canada Coalition, develop maps of areas of high ecological integrity (KBA Criterion C) using definitions of ecological and biocultural integrity based on Indigenous knowledge and science.
- Define and identify “areas of high biodiversity importance, including ecosystems of high ecological integrity” in Canada (e.g., through KBA Canada and Pathway), and assess where adequate spatial plans/processes are in place that will contribute to bringing loss of important areas close to zero by 2030.
- Make federal funding for sectors and P/Ts conditional on having plans in place that will help bring loss of areas of high biodiversity importance & ecological integrity close to zero by 2030.
- Finalize Canadian Vegetation Classification System to support Red List Ecosystem Assessments and reporting (Headline indicator).

- Ensure that various federal resource management policies acknowledge the need for biodiversity-centric inclusive spatial planning to best ensure policy coherence across federal departments.
- Create a 'one-stop' Canadian biodiversity data portal to provide links and data to support land use planning and sustainable development.

### **Recommendations on Target 1 indicators:**

Headline Indicators:

#### **A.1 Red List Ecosystems**

- Currently, there are only 15 ecosystems from Canada that are included in the Red List of Ecosystems (with several that are erroneously attributed to Canada, but do not occur). Using the Red List of Ecosystems will require resources to assess Canada's ecosystems and continued support to complete the Canadian National Vegetation Classification.
- Red List Ecosystem assessments are also needed to identify Key Biodiversity Areas in Canada under the criterion for Threatened Ecosystem Types.

#### **A.2 Extent of Natural Systems**

- The proposed domestic indicator of 'land-use change' could be rolled into this indicator as its intent is to also show trends.
- Not all natural systems are the same. Wildlife habitat capacity should also be integrated into this indicator. Canada currently has an environmental sustainability indicator for wildlife habitat capacity on agricultural lands that could be integrated, and an additional indicator for wildlife habitat capacity on forested lands should be developed to differentiate between natural and degraded forests.

Domestic Indicators:

#### **Percent of land and sea area covered by biodiversity-inclusive spatial plans**

- This is an important indicator, but ensuring nature conservation, the maintenance of ecosystem services, and the mainstreaming of conservation needs to look beyond simply the area covered by biodiversity-inclusive spatial plans. See Recommended component/complementary indicators below.

#### **Land-use change**

- Wetlands should be added to this existing indicator.

#### **Extent of Canada's Wetlands**

- This current environmental sustainability indicator is helpful to highlight the global importance of Canada's wetlands and peatlands and their regional distribution.
- This indicator should incorporate and report on wetland extent trend data based on land use change analysis, with a focus on southern Canada.
- The current indicator should be expanded to include marine wetlands such as salt marshes and eel-grass beds.

Recommended component/complimentary indicators:

- **Intact High Integrity Ecosystems and Climate Stabilization Areas, & Priority retention of intact / areas of high ecological integrity:** Note that the global name for this indicator

includes 'wilderness' which is generally not used in the Canadian context. KBA Canada is currently identifying KBAs that qualify under the criteria C (wholly intact ecological communities). While not all of these areas will be KBAs, this analysis will identify Intact High Integrity Ecosystems in Canada.

- **Percentage of spatial plans utilizing information on Key Biodiversity Areas:** this GBF component/complimentary indicator should be added to ensure planning processes include the most critical places for nature.
- The **Ecosystem integrity** indicator is critical for this target. Ensure that global indicators are tailored to Canada (e.g., accurate road layers, including resource road, inclusion of biocultural integrity).

Other recommended domestic indicators:

- A domestic indicator that also reports on the **status and trends of tracked ecosystems** in Canada (by Conservation Data Centres) should also be considered as a domestic indicator to complement the Red List of Ecosystems Index.
- **Condition of KBAs.** Monitor the condition of KBAs to quantify changes to areas of high biodiversity importance as well as proportion of areas of high biodiversity importance that are effectively protected or managed. This could be combined with the complementary indicator **Status of Key Biodiversity Areas** in Target 3.

## **Target 2: Restore 30% of all Degraded Ecosystems**

*Ensure that by 2030 at least 30 percent of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.*

### **Recommendations on Target 2 actions:**

- Canada should identify an explicit baseline to devise a tailored target for restoration that fits the Canadian context.
- The restoration target should be geographically based as a percentage of areas of degraded terrestrial, inland water, and coastal and marine ecosystems (instead of number of trees, for example).
- Focus restoration efforts around areas of high biodiversity importance, including Key Biodiversity Areas and critical habitat.
- Encourage the use of land-sharing agreements with landowners and Indigenous peoples to allow Indigenous peoples to have access and ability to practice their way of life.
- Ensure funding towards Indigenous-led and Nature-based Climate Solutions as well as two-eyed seeing based approaches to ecosystem restoration.
- When conducting research with Indigenous peoples, a memorandum of understanding (MOU) must be developed in collaboration with non-Indigenous researchers and Indigenous peoples prior to the start of research to inform intent and collaborative agreement.

### **Recommendations on Target 2 indicators:**

Headline Indicators:

#### **2.2 Area under restoration**

- This indicator should be supported by a sub-indicator that includes the percentage of the areas that are supporting areas of high biodiversity importance. Monitor KBAs to prioritize restoration efforts in those being degraded.

Domestic Indicators:

#### **Restoring the Great Lakes Areas of Concern**

- While useful for the Great Lakes, this indicator is very regional and should not be part of national biodiversity tracking. It could be integrated into qualitative reporting on regional initiatives.

Recommended component/complementary indicators:

There are several GBF component/complementary indicators under Target 2 that support the mapping and identification of areas that do not need restoration and are intact areas with high ecosystem integrity. Given Canada's global importance for maintaining high integrity ecosystems, these indicators should be included:

- **Intact High Integrity Ecosystems and Climate Stabilization Areas:** Note that the global name for this indicator includes 'wilderness' which is generally not used in the Canadian context.
- **Forest Landscape Integrity Index and Free-flowing rivers**

**Target 3: Conserve 30% of Land, Waters and Seas**

*Ensure and enable that by 2030 at least 30 percent of terrestrial and inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.*

**Recommendations on Target 3 actions:**

The federal government has already committed to the 30x30 objective, but it needs to ensure that the focus is on the quality of areas protected. This means attention to Key Biodiversity Areas (which include high integrity and rare ecosystems), culturally important ecosystems, and factors like ecosystem functions and services (e.g., carbon and water), along with connectivity.

- Protected area selection and planning should ideally occur within the context of regional-scale spatial planning (Target 1). Prioritize large high-integrity forests and peatlands for protection measures, focusing first on Indigenous-led stewardship, as part of Canada's commitment to protect 30% of lands by 2030.
- Target 3 is an opportunity for Canada to commit to a reinvigorated Pathway process with participation of provinces and territories (P/T) to guide delivery of the 30x30 commitment with adherence to quality measures and agreed-upon protection standards.
- Completing publicly available nature funding agreements with P/Ts that include commitments to Target 3 and P/T support for specific Indigenous Conservation Protected Areas that make measurable contributions to the target should also be part of Canada's response.

**Recommendations on Target 3 indicators:**

The two proposed indicators will not improve reporting on the qualitative aspects of the target.

Headline Indicators:

**3.1 Coverage of protected areas and other effective area-based conservation measures**

(Domestic indicator – Canada's conserved areas)

- Coverage is an important indicator, but without supplementing this with measures of quality there is a risk of achieving 30% by 2030 but not having a significant impact on halting the loss of biodiversity. See suggested new indicators.

Domestic Indicators:

**Ecological integrity of national parks**

- This existing indicator currently provides only local information on Canada's biodiversity. As a 2030 Biodiversity Strategy indicator, park by park reporting should be supplemented with a section that extrapolates the results to the broader ecoregion the national park represents.

Recommended component/complementary indicators:

**Protected area coverage of Key Biodiversity Areas & Status of Key Biodiversity Areas**

- A domestic indicator on the percent of areas of high biodiversity importance in protected and conserved areas and the status of Key Biodiversity Areas should be added (this is already being tracked for Key Biodiversity Areas).
- KBA Canada should be tasked to define 'status' for this indicator.
- This indicator should recognize that KBAs are not prescriptive, and effective conservation also occurs through private land stewardship.

#### **Target 4: Halt Species Extinction, Protect Genetic Diversity, and Manage Human-Wildlife Conflicts**

*Ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence.*

#### **Recommendations on Target 4 actions:**

Action on this target will need to include species beyond those listed under the federal *Species at Risk Act* (SARA) to be effective, including those assessed (and not yet listed) as at risk by COSEWIC, species on COSEWIC candidate lists, and species ranked as national and globally imperiled and vulnerable by NatureServe.

- Identify, protect, and report on critical habitat. Use the full powers of SARA to implement recovery actions and the protection of critical habitat, and report on P/T progress.
- Key Biodiversity Areas identify the most critical areas for threatened species. Leverage Key Biodiversity Areas to pre-emptively support conservation efforts for species that are threatened, including those that could be listed under SARA.
- Create at least 20 ecosystem-based recovery strategies and action plans based on KBAs with multiple species at risk and other species of conservation concern.
- Prioritize halting the loss of culturally significant species through Indigenous-led conservation and practices (e.g., Indigenous-led seed banks)

#### **Recommendations on Target 4 indicators:**

Headline Indicators:

##### **A.3 Red list Index**

- The RLI only considers ‘genuine changes’ (i.e., changes in status resulting from conservation actions or reduced threats) in the number of species in each category of extinction risk. Genuine and non-genuine status changes should be included in the domestic indicator on **Changes in the status of wildlife species at risk**.
- Limitations on this indicator should be noted, particularly the paucity of Red List assessments in Canada and that the current Red List Index trend for Canada is the result of a bias in assessments towards birds and mammals, which have been the focus of conservation actions for over a century. Additionally, the Red List Index may not adequately represent regional variations, as global trends can mask national threats. Results of the Red List Index will need to be interpreted with national wild species status indicators including the **General status of wild species**.

##### **A.4 The proportion of populations within species with an effective population size > 500**

- This Headline indicator will require some nuanced reporting. Population size is not known for many species, including species at risk. While 500 individuals is a general guide, based on the 50/500 rule, to avoid short-term inbreeding and to preserve long-term adaptive potential, it is not applicable to many species and effective population size can also vary within the range of a species. For example, a study in Quebec on American Ginseng found that viable

populations contain at least 172 individuals whereas in central Appalachia (United States) viable populations were estimated to have 780 to 820 individuals.

Domestic Indicators:

### Species at risk population trends

- These results should be interpreted with caution. Species assessed as special concern may have fewer and less immediate threats (hence their assessment as special concern). It can take many years for species to show progress towards their population and distribution objectives. Examples of challenges in this regard include the long-time frame involved as it can take several generations for species to respond to management and recovery actions and the need for enough time to collect and assess information.
- Recovery documents in Canada have been criticized for lacking ambition, which influences this indicator by setting a low bar for population and distribution objectives.
- This domestic indicator should also focus on **Percentage of threatened species that are improving in status** (GBF complementary indicator)

### Canadian species index

- While this current indicator is useful, there are similar indices that report conflicting results. From 1970 to 2018, the index for the terrestrial system decreased by 14% and 16% for the marine system, while the index for the freshwater system increased by 38%. The 'bird bias' is likely driving this optimistic assessment of freshwater systems given that other assessments of all freshwater species of plants and animals found 11.7% to be at risk.

### General status of wild species

- As with the RLI, the general status report identifies genuine and non-genuine changes in status. However, there needs to be clearer definitions of these status change categories. More detailed reporting on what is driving species to be reassessed in higher or lower risk categories is also needed to identify both threats and effective recovery actions.

Recommend component/complementary indicators:

### Changes in the status of wildlife species at risk

- Canada already reports on this indicator, and it supports **Percentage of threatened species that are improving in status** (GBF complementary indicator)
- This indicator could be strengthened by differentiating between genuine and non-genuine status changes and reporting the percentage of species by change in risk category over time.
- Note that there are some conflicts between the indicator on meeting objectives in recovery documents. For example, the indicator on population trends reports that no amphibians show progress, but the status of the Rocky Mountain Tailed Frog was downlisted from Endangered to Threatened in 2013. Black-tailed Prairie Dog is meeting its population and distribution management objectives but was uplisted from Special Concern to Threatened in 2018.

### **Target 5: Ensure Sustainable, Safe and Legal Harvesting and Trade of Wild Species**

*Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spill-over, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.*

#### **Recommendations on Target 5 actions:**

While Canada is a small player relative to other countries at a global scale, it does play a role in global wildlife trade through the import and export of animals. Unsustainable trade leads to wildlife declines, and Canada's participation does need to be addressed in the broader sustainability context. This includes, for example, the elephant ivory trade.

- Pathogen spillover associated with wildlife trade is not likely to occur within Canada, but as we have seen with COVID-19, Canada will bear the consequences of outbreaks in other places and should therefore support efforts (e.g., the development of an international pandemic instrument) that focus on prevention of pandemics at source.
- Undertake robust management of wild species, including those subject to exploitation (Targets 4, and 5) and domestic or wild species found in agricultural landscapes (Targets 9, 10). A precautionary approach and the call to reduce pathogen spillover (as called for in Target 5) should guide Canada's positions in CITES, Regional Fisheries Management Organizations, and other such fora, as well as through cooperative efforts, reflecting the reality that wildlife health is a global public good.

#### **Recommendations on Target 5 indicators:**

Headline indicators

No comments.

Domestic indicators

#### **Proportion of game species with healthy populations that support sustainable hunting with non-restrictive bag limits and season length**

- The Milestone Document indicates this is an existing indicator, but it does not appear in searches.

Recommended component/complimentary indicators

- **Bycatch of vulnerable and non-target species** remains a serious threat to marine biodiversity, including species at risk and should be reported on by Canada.

### **Target 6: Reduce the Introduction of Invasive Alien Species by 50% and Minimize Their Impact**

*Eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services by identifying and managing pathways of the introduction of alien species, preventing the introduction and establishment of priority invasive alien species, reducing the rates of introduction and establishment of other known or potential invasive alien species by at least 50 per cent by 2030, and eradicating or controlling invasive alien species especially in priority sites, such as islands.*

#### **Recommendations on Target 6 actions:**

Invasive species are a major threat in Canada for terrestrial and aquatic species and ecosystems and coordinated attention is required. Most provinces have initiatives (e.g., Invasive Species Councils or inter-ministerial working groups) devoted to invasive species management, but only Ontario and BC have legislation or regulation focused on invasive species with the primary objective of biodiversity conservation (as opposed to protecting agriculture or forestry, e.g., weed control acts). Implementation of Target 6 in Canada would provide an opportunity to re-examine and coordinate the approach taken across Canada and improve accountability for managing and addressing this pervasive threat. There are many effective local programs occurring across Canada—the challenge is to scale these up to have national impact.

- Strengthening how we identify invasive species and prioritize action to address environmentally harmful invasive species by, for example by developing a national priority list.
- While the focus should be on the prevention of new introductions, support for coordinated actions to stop the spread of priority species should also be strategically supported.
- Provide long term capacity support for P/T invasive species councils.
- Encourage and support community-led ways to eliminate, minimize, reduce and or mitigate the impacts of invasive alien species on biodiversity (e.g., fishing derbies, community cookbooks, food gatherings).
- Include Indigenous Land Guardians for monitoring invasives as well as provide training support around actions to control invasives with preference to Indigenous-led ideas and methods.

#### **Recommendations on Target 6 indicators:**

Headline indicators:

##### **6.1 Rate of invasive alien species establishment**

This is an essential indicator for Canada but should be supplemented with a domestic indicator to track the spread of invasive species within Canada (see below).

Domestic indicators:

##### **Rate of response to detected IAS**

- This indicator may be largely descriptive but will be provide an important summary and assessment of rapid responses. ‘Rate’ will need to be defined (and may not be needed in the final indicator title).

Other recommended domestic indicators:

##### **Spread of invasive species in Canada**

- There are many invasive species established in Canada that need to be managed to control their spread. In particular, Canada's northern ecosystems are becoming increasingly vulnerable to invasive species because of climate change and infrastructure. New invasive species tracked by province and territory will support monitoring the spread of established invasive species and management responses.
- This supports the component indicator of **Rate of invasive alien species spread**.

#### **Number and capacity of invasive species councils**

- The capacity and coordination of invasive species councils are critical for the early detection and management of invasive species. They are also essential for outreach and awareness. Tracking the number, annual budget, and other capacity measures will provide an important response indicator for Target 6 and help identify gaps.

### **Target 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity**

*Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on science, taking into account food security and livelihoods; and also preventing, reducing, and working towards eliminating plastic pollution.*

#### **Recommendations on Target 7 actions:**

Most efforts in Canada, including the revised *Canadian Environmental Protection Act*, are focused on the human impacts of pollutants, whereas impacts on biodiversity are dealt with through more piecemeal efforts. The partial plastics ban will be helpful to biodiversity and should be integrated into the Strategy. Pollution is a large umbrella for a variety of impacts, including many “emerging” pollutants, such as ocean noise and light. As mentioned in the indicators, there are many types and risk of pollution, and the 2030 Strategy and monitoring framework should more clearly distinguish them.

- A focus on language emphasizing usage reduction, as was included in previous drafts of the GBF, rather than risk reduction would serve as a more effective foundation for Canada’s biodiversity plan.
- Reducing the overall risk from pesticides and highly hazardous chemicals (which are the same) by at least half will seem arbitrary and this global threshold should be explained. There are also many chemicals that are hormone disrupters that have a high risk for biodiversity and people at very low concentrations and these should be highlighted.
- Attention is growing on noise pollution control, mostly focused in marine areas, and on light pollution, and these efforts need to be accelerated in Canada. This should include the development of an [Ocean Noise Strategy](#).
- The issue of excess nutrients entering water bodies is well known in places like Lake Erie, Lake Winnipeg and Lake Simcoe and points to the need to expand and scale-up nutrient management programs.
- Pollution does not follow international borders. This target needs actions that support international efforts to track and reduce pollution including air-borne emissions and heavy metals from ship fuels.

#### **Recommendations on Target 7 indicators:**

**Target 7** is intended to focus on all sources of pollution. However, each pollution source will likely require its own indicator for action to be effective.

Headline indicator

#### **7.1 Index of coastal eutrophication potential**

It’s unclear if the current domestic indicator of nutrients in the Great Lakes and Lake Winnipeg is providing this national indicator. This indicator needs to include marine coastal areas using approaches already developed by the federal government.

Domestic indicators

No comments.

Recommended component/complementary indicators

**Trends in the amount of litter in the water column, including microplastics and on the seafloor**

- This comprehensive indicator should replace the current domestic indicator of **Plastic particles in the Northern Fulmar**.

**Underwater noise levels**

- Ocean noise is an emerging threat in Canada's Arctic Ocean and a national protocol to monitor this threat should be established and included in Canada's reporting for Target 7.

**Pesticide use per area of cropland**

- This indicator is currently tracked in Canada and should be used to support tracking of Target 7.

### **Target 8: Minimize the Impacts of Climate Change on Biodiversity and Build Resilience**

*Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solution and/or ecosystem-based approaches, while minimizing negative and fostering positive impacts of climate action on biodiversity.*

#### **Recommendations on Target 8 actions:**

**Target 8** focuses on climate change as a driver of biodiversity loss, which is increasing in importance. This target works together with Target 11 (nature's contributions to people, which includes climate regulation). We also need to ensure that all climate mitigation and adaptation efforts occur through a climate and biodiversity lens to avoid negative impacts on biodiversity and instead, wherever possible, optimize biodiversity co-benefits.

- This target can be made stronger and tailored to Canada by prioritizing conservation action in high-carbon ecosystems, particularly those with irrecoverable carbon (e.g., peatlands, for which Canada has 25% global responsibility) that we cannot afford to lose if we want to achieve net zero carbon emissions by 2050.
- Develop and implement a cross-cutting strategy to ensure the protection, long-term management and restoration of peatlands across Canada.
- Develop a full suite of tools (including blended finance, impact funds, biodiversity bonds, payments for ecosystem services) and financing mechanisms that recognize the value of carbon stores and sinks in Canada and can spur investments to protect them as a complement to offsets.
- Develop and implement actions that deliberately consider synergies and trade-offs between biodiversity and climate actions, including integration of biodiversity into the climate change lens being led by the Privy Council Office.
- Conduct a review of all federal policies for wetlands, water, climate, and industry (including critical minerals), to explicitly include peatlands in updated goals and actions and to coordinate across different strategies and plans.
- Ensure that natural climate solutions are planned for their long-term effectiveness, and not narrowly focused on rapid carbon sequestration. Along with this, link carbon offsets to an overarching mitigation hierarchy.

#### **Recommendations on Target 8 indicators:**

No headline indicator has been developed.

Domestic indicators

#### **Land-based greenhouse gas emissions and removals**

- This indicator is similar to the GBF complementary indicator **National greenhouse inventories from land use and land use change**.

Recommended component/complementary indicators:

**Total climate regulation services provided by ecosystems by ecosystem type** (System of Environmental Economic Accounts).

- This accounting should include carbon stored by peatlands and other high integrity ecosystems in Canada.

## TARGETS 9-13: MEETING HUMAN REQUIREMENTS THROUGH SUSTAINABLE USE

### Target 9: Manage Wild Species Sustainably To Benefit People

*Ensure that the management and use of wild species are sustainable, thereby providing social, economic, and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and local communities.*

#### Recommendations on Target 9 actions:

Many Indigenous and rural communities in Canada rely on wild species for food, livelihoods and products like medicines, cosmetics and recreation. Forestry, aquaculture and fisheries industries in Canada all use and consume wild species. Only through effectively conserving wild species and keeping ecosystems healthy can we continue to meet these demands.

- One area not well addressed in the Target is highlighting the importance of culturally significant species, such as Moose, Black Ash, Coho Salmon and Lake Sturgeon. Establish federal government support for culturally significant species so Indigenous Peoples can set priorities, define culturally appropriate practices, and undertake and monitor restoration efforts.

#### Recommendations on Target 9 indicators:

We recognize that this is a challenging target to measure and methods for the headline indicators are under development:

Other recommended domestic indicator:

- We encourage the development of a domestic indicator on **culturally significant species**. This could include a regional (by ecoregion or traditional territory) listing of all culturally significant species that then used both traditional knowledge and status rankings from NatureServe to track their status. This could be a companion report to the General Status of Wild Species reporting. This is similar to the GBF component indicator on the **Red List Index (species used for food and medicine)** but would focus on species data from Canada.

**Target 10: Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry** *Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches contributing to the resilience and long-term efficiency and productivity of these production systems and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.*

#### **Recommendations on Target 10 actions:**

Generally, it is assumed in Canada that current laws and regulations are successfully minimizing damage to biodiversity from agriculture, forestry, aquaculture and fisheries, but cumulative threats in particular are increasing and are poorly addressed.

- A stronger focus on directly addressing the biodiversity threats posed by production systems in Canada is needed, along with strategies for better supporting biodiversity within agriculture and managed ecosystems, within the context of efforts to sustain food production in a changing climate and amid shifting land pressures.
- Target 10 for Canada is very general and needs to be made specific and measurable.
- The section on forestry should be made more balanced by recognizing that while there have been important strides towards sustainability, industrial forest practices impact high integrity ecosystems and some species at risk.
- Text on agriculture should highlight that while agricultural lands only occupy about 6.2% of Canada, most of Canada's species at risk occur in regions dominated by agricultural lands.
- Integrate KBAs into impact assessment processes, and work with the private sector to avoid or minimize impacts on KBAs, adapting international guidelines on [Business and KBAs to Canada](#).
- Implement Indigenous management plans into all provincial management plans in order to manage land and waters from a two-eyed seeing perspective and encourage customary sustainable use informed by Indigenous peoples, traditional knowledge and their guiding principles.

#### **Recommendations on Target 10 indicators:**

Headline indicators:

##### **10.2 Progress towards sustainable forest management**

- Unclear why this is listed as a headline and domestic indicator in the Milestone Document.

Domestic indicators:

##### **Wildlife habitat capacity on agricultural land**

- This is a critical indicator. While the overall capacity was stable between 2011 to 2017, there was significant regional variation that should be highlighted in the indicator.

Other recommended domestic indicators:

##### **Wildlife habitat capacity on forestry lands**

- Interestingly, while Canada reports on wildlife capacity of agricultural lands, there is no reporting on wildlife capacity in industrial forests. Forest degradation, the reduction or loss of biological complexity, is a result of harvest and intensive silviculture. In eastern Canada, loss of breeding habitat occurred for 66% of the 54 most common bird species from 1985 to 2020 as a result of forest degradation, primarily through a reduction in old age classes. Using established methods this indicator would support sustainable forestry practices and also contribute to our understanding of degraded forest ecosystems.
- An indicator on aquaculture and fisheries should be added for this target.
- Stats Canada already reports on Farms with Environmental Plans. This indicator would support reporting on the agricultural sector.

### **Target 11: Restore, Maintain and Enhance Nature's Contributions to People**

*Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as regulation of air, water, and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters, through nature-based solutions and/or ecosystem-based approaches for the benefit of all people and nature.*

#### **Recommendations on Target 11 actions:**

Implementation of this Target in Canada should prioritize action in places that provide a high level of ecosystem services, allowing for the most efficient use of resources and capacity to ensure that these important services are maintained and/or restored.

- Actions to reach this target include reducing the direct pressures on the ecosystems that provide services related to the regulation of air quality, hazards and extreme events and quality and quantity of water (Targets 1, 4-6), proactive measures to conserve and restore key ecosystems (Targets 2-3), and to create or re-create green and blue spaces in urban areas (Target 11).
- Further actions towards this target could also support targets related to climate change mitigation adaptation and disaster risk reduction (Target 8), ensuring benefits for people (Target 9) and the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems (Target 10).

#### **Recommendations on Target 11 indicators:**

Headline indicators:

##### **B.1 Services provided by ecosystems**

- Include peatlands and high integrity ecosystems in this indicator.

Domestic indicators:

##### **Status of Nature's Benefits to humans**

- It is unclear how this is different from the headline indicator.

#### **Water quality in Canadian rivers**

- This is a pollution indicator and should be added to Target 7. Component and complimentary indicators for this target should be linked to air and water pollution.

### **Target 12: Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity**

*Significantly increase the area and quality and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature and contributing to inclusive and sustainable urbanization and the provision of ecosystem functions and services.*

#### **Recommendations on Target 12 actions:**

- The current target could be made more specific by including ‘all Canadian cities have developed and are implementing a biodiversity strategy and there are improvements in environmental quality and species at risk in urban areas.’ The section on species at risk can be linked to the urban sector under the Pan-Canadian approach to transforming species at risk conservation in Canada.
- Highlight that many cities (e.g., Toronto, Edmonton, Vancouver) have already prepared biodiversity strategies.
- Develop and launch a stream of the Habitat Stewardship Program aimed at urban areas, including that funds can be used to develop participatory biodiversity strategies.

#### **Recommendations on Target 12 indicators:**

Headline indicators:

##### **12.1 Average share of the built-up area of cities that is green/blue space for public use for all**

- Data from Community Foundations Vital Signs reports can be used to report on this indicator. Ideally Stats Canada can use new detailed imagery to create a standard national report.
- This indicator should also include reporting on access to nature and the links between poverty and access to green spaces in cities (e.g., percentage of population living within 500 m of green space).

Domestic indicators:

##### **Designation of new national urban parks**

- This is a useful indicator, but it should be rolled into a more comprehensive indicator on urban conserved and protected areas and biodiversity designations, including urban Key Biodiversity Areas.

##### **Satisfaction with local environment**

- This should be rolled into the biennial Canadian Nature Survey (see cross-cutting recommendations).

**Target 13: Increase the Sharing of Benefits From Genetic Resources, Digital Sequence Information and Traditional Knowledge**

*Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilization of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030 facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.*

**Recommendations on Target 13 actions:**

- Make the target more specific by committing to developing and implementing an access and benefit-sharing framework by 2030.
- Continue to engage with provinces, territories, Indigenous communities and governments as well as interested stakeholders on access and benefit-sharing and commit to accession of the Nagoya Protocol by 2030.

**Recommendations on Target 13 indicators:**

No comments.

TARGETS 14-23: TOOLS AND SOLUTIONS FOR IMPLEMENTATION AND MAINSTREAMING
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**Target 14: Integrate Biodiversity in Decision-Making at Every Level**

*Ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting, within and across all levels of government and across all sectors, in particular those with significant impacts on biodiversity, progressively aligning all relevant public and private activities, fiscal and financial flows with the goals and targets of this framework.*

**Recommendations on Target 14 actions:**

Actions in Target 1 are important to support the implementation of this target. This target should increase the consideration and coverage of biodiversity in various policies, laws and regulations, and planning processes. But it also needs to spur an effort to make these policies stronger in order to better reflect the needed transformative change by including budgets, frameworks, and metrics, as well as effective enforcement measures.

- Implementation of Target 14 in Canada could provide an opportunity for development of a whole-of-government policy for mainstreaming biodiversity and addressing project-level biodiversity impacts that center on a strong application of the mitigation hierarchy, in keeping with the federal government’s commitment to develop and implement a “climate and biodiversity lens.”
- A broader focus on achieving biodiversity targets at geographic or sectoral levels would also improve the current focus on mitigating individual project impacts. Tools like Regional and Strategic Assessments and spatial planning should be more fully embraced.
- For countries like Canada that have large global supply chain footprints or global trade volume, there will be a need to pay attention to both domestic trade/development and trade impact/value chain impact along its global supply chain.

**Recommendations on Target 14 indicators:**

Indicators under development

Other recommended domestic indicators:

- The Ontario Biodiversity Strategy has included an element of mainstreaming as a target since 2011 and the [State of Ontario Biodiversity Report](#) should be reviewed for potential indicators.

**Target 15: Businesses Assess, Disclose and Reduce Biodiversity-Related Risks and Negative Impacts**

*Take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions:*

- (a) Regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity, including with requirements for all large as well as transnational companies and financial institutions along their operations, supply and value chains and portfolios;*
- (b) Provide information needed to consumers to promote sustainable consumption patterns;*
- (c) Report on compliance with access and benefit-sharing regulations and measures, as applicable; in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.*

**Recommendations on Target 15 actions:**

A big challenge for nature-based risk disclosure is the lack of clear and simple indicator systems available to businesses, which leads to each company developing disclosure protocols to fit their own needs and business type. The actions in Target 1, 2, 3 addressing baseline development and measurement development can support this target. We expect that government action in pursuit of this target will increase pressure on businesses to act on biodiversity protection and better monitor and report on progress. Implementation of this target in Canada could not only hasten the trend of large multinational companies and financial institutions improving their own disclosure performance, but it could also give Indigenous peoples and communities, and civil society, better insight into corporate activities and impacts.

- Transparency is fundamental for understanding the footprint and dependencies of development. Disclosure, no matter how preliminary it can be at the beginning, is an excellent start to improving transparency. The global [Taskforce on Nature-related Financial Disclosures](#) has Canadian member companies and organizations and is increasingly being used as a framework to shift financial flows to nature-positive outcomes. Formalizing this at a national level and tailoring to a Canadian context would strengthen implementation, as Canada has committed as a signatory to the [G7 2030 Nature Compact](#).

**Recommendations on Target 15 indicators:**

Headline indicators

**15.1 Number of companies reporting on disclosures of risks, dependencies and impacts on biodiversity**

- While this indicator is still in development, Canada already has baseline data. A [recent analysis](#) discovered that only one-third of Canadian companies report on biodiversity loss.

Domestic indicators

**Progressively reduce negative impacts on biodiversity, increase positive impacts**

- While intended to track businesses that adopt select environmental practices as per SDG 12, this indicator is unclear.
- We suggest replacing this indicator with the GBF complementary indicator: **Number of companies publishing sustainability reports.**

Other recommended domestic indicators:

- National extinction risk footprint. Report on Canada's contribution to global extinctions. This type of reporting can also be done by sector to help businesses identify nature-based risks.
- In addition, the State of Ontario Biodiversity report has a methodology to indicate the extent to which Ontario companies have integrated biodiversity in their corporate planning and reporting that should also be considered as a domestic indicator.

**Target 16: Enable Sustainable Consumption Choices To Reduce Waste and Overconsumption**

*Ensure that people are encouraged and enabled to make sustainable consumption choices including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption, and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.*

**Recommendations on Target 16 actions:**

Currently just about all laws in Canada that have safeguards for biodiversity are focused on mitigation of impacts rather than avoidance and have nothing to say about setting limits on consumption. Efforts to develop more circular economic practices are highly siloed and not far advanced in Canada compared to Europe and countries like Japan and China.

Canada's "ambition" for SDG Goal 12 (sustainable consumption and production) is currently limited to "the purchase of zero-emission vehicles" and "extending the lifespan of products through repair and refurbishment".

**Recommendations on Target 16 indicators:**

Other recommended domestic indicators:

- The component indicator of **Ecological Footprint** would track Canada's footprint of consumption on global biodiversity. This indicator is currently tracked in the Ontario Biodiversity Strategy.

**Target 17: Strengthen Biosafety and Distribute the Benefits of Biotechnology**

*Establish, strengthen capacity for, and implement in all countries in biosafety measures as set out in Article 8(g) of the Convention on Biological Diversity and measures for the handling of biotechnology and distribution of its benefits as set out in Article 19 of the Convention.*

**Recommendations on Target 17 actions:**

- The target preamble should also highlight the potential role of GMOs in invasive species management (e.g. 'daughterless carp'). Technologies, including living modified organisms, are rapidly evolving and could play a critical role in reducing the ecological and economic impacts of invasive species that are established in Canada. The 2030 strategy is an opportunity to prepare the legislative framework for applications of biotechnologies.
- Develop national regulations for the use of GMOs in invasive species management.

**Recommendations on Target 17 indicators:**

No headline or domestic indicators have been developed.

### **Target 18: Reduce Harmful Incentives by at Least \$500 Billion per Year, and Scale Up Positive Incentives for Biodiversity**

*Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least 500 billion United States dollars per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.*

#### **Recommendations on Target 18 actions:**

Repurposing, or eliminating subsidies across the economy (including agriculture, construction, forestry, fossil fuels, marine capture fisheries, transport and water sectors) could help unlock the financing needed to promote positive actions to safeguard biodiversity. Addressing this target will require attention to resolve policy incoherence within domestic laws and policies to prevent harmful net biodiversity outcomes.

- Canada's 2030 target should be clear. The current text '*to be well into the process*' should be replaced with a specific and measurable commitment. This will be necessary for reporting on the headline indicators. We suggest 'at least 60%'.
- Highlight that Canada has already committed in the [G7 2030 Nature Compact](#) to review and better align federal financial flows and policies to meaningfully consider biodiversity outcomes, which should certainly be reflected in its NBSAP.
- Explore supporting property tax reforms to enable municipalities to reward landowners that protect and restore biodiversity with a focus on critical habitat and Key Biodiversity Areas. South Africa's [Biodiversity Tax Incentives](#) are a model for these incentives.
- Consider and address impacts on global biodiversity in reviewing harmful subsidies (Target 18).

#### **Recommendations on Target 18 indicators:**

Headline indicators:

##### **18.1 Positive incentives in place to promote biodiversity conservation and sustainable use**

- This can include both traditional environmental funding and harmful subsidies that have been redirected to support biodiversity. Provincial programs to support nature conservation, such as Ontario's Conservation Land Tax Incentive Program, should also be accounted for in this indicator.

##### **18.2 Value of subsidies and other incentives harmful to biodiversity that have been eliminated, phased out or reformed**

- This is a key indicator to track and should be initiated in 2025 as suggested in the Strategy even if the baseline information is still being developed.
- It should be supported by the component indicator: **Value of subsidies and other incentives harmful to biodiversity, that are redirected, repurposed or eliminated** to identify where harmful subsidies have been redirected towards supporting conservation and sustainability.

**Target 19: Mobilize \$200 Billion per Year for Biodiversity From all Sources, Including \$30 Billion Through International Finance**

*Substantially and progressively increase the level of financial resources from all sources, in an effective, timely and easily accessible manner, including domestic, international, public and private resources, in accordance with Article 20 of the Convention, to implement national biodiversity strategies and action plans, by 2030 mobilizing at least 200 billion United States dollars per year*

**Recommendations on Target 19 actions:**

These efforts need to be better coordinated internationally to ensure a more equitable and fairer sharing of the costs of addressing biodiversity loss.

- Canada's 2030 Strategy should include both financial mobilization for domestic implementation of nature conservation and funding for international assistance.
- With respect to domestic funding, continued and increased funding levels aligned with the agreement's ambition along with implementing a whole-of-government, whole-of-society approach will be necessary (see [Green Budget Coalition](#)). The commitment to complete publicly available funding agreements with provinces and territories that include commitments to the GBF targets and P/T support for specific Indigenous-led conservation initiatives (IPCAs and Guardians) that make measurable contributions to GBF targets and commit to agreed-to protection standards should also be included.
- With respect to international assistance, Canada has pledged increasing levels of funding. An NBSAP can solidify this commitment for future years and provide details for how funds will be distributed.

**Recommendations on Target 19 indicators:**

No comments.

### **Target 20: Strengthen Capacity-Building, Technology Transfer, and Scientific and Technical Cooperation for Biodiversity**

*Strengthen capacity-building and development, access to and transfer of technology, and promote development of and access to innovation and technical and scientific cooperation, including through South-South, North-South and triangular cooperation, to meet the needs for effective implementation, particularly in developing countries, fostering joint technology development and joint scientific research programmes for the conservation and sustainable use of biodiversity and strengthening scientific research and monitoring capacities, commensurate with the ambition of the goals and targets of the framework.*

#### **Recommendations on Target 20 actions:**

While the orientation of the GBF is mostly in Global South countries, the relatively small population of Canada distributed over an enormous landbase with distributed governance means there are clear capacity limitations in this country that must be addressed in order to achieve the biodiversity targets. Canada can do more in terms of specific initiatives to support this target but can also play an important role by demonstrating leadership in implementing the GBF.

- Highlight Canada's role in Commission for Environmental Cooperation as a model for sharing information to support conservation decision-making.
- Support efforts such as the Network of Latin American and Caribbean Environmental Funds to build conservation capacity with a focus on shared migratory species.
- Support information and knowledge sharing about Key Biodiversity Areas. Canada is one of the first global KBA programs and there is an opportunity to share this experience to support other country programs.
- Ensure all federal government data is open access and easily accessible.
- Support Indigenous leadership to inform climate change adaptation and the protection of biodiversity by providing funding opportunities for community liaisons, allowing Indigenous peoples to build capacity and allow more opportunities for participation.

#### **Recommendations on Target 20 indicators:**

These indicators are in development.

Other recommended domestic indicators:

#### **Number and size of projects for migratory Canadian species in wintering habitats in Latin America.**

- Of Canada's 574 migratory species, 24% have some level of conservation concern. Supporting and reporting on conservation projects for these species outside of the range in Canada is an opportunity to increase international cooperation while advancing recovery actions.

### **Target 21: Ensure That Knowledge Is Available and Accessible To Guide Biodiversity Action**

*Ensure that the best available data, information and knowledge, are accessible to decision makers, practitioners and the public to guide effective and equitable governance, integrated and participatory management of biodiversity, and to strengthen communication, awareness-raising, education, monitoring, research and knowledge management and, also in this context, traditional knowledge, innovations, practices and technologies of indigenous peoples and local communities should only be accessed with their free, prior and informed consent, in accordance with national legislation.*

#### **Recommendations on Target 21 actions:**

The text of this target needs to focus more on the monitoring and reporting framework for the strategy. It is critical to ensure the biodiversity strategy is accompanied by robust indicators and a commitment to regular, transparent reporting. The suite of indicators can be built on over time. Previous reporting for the 2020 biodiversity strategy (ESTR) was comprehensive, but static. CESI indicators are a useful foundation, but there will need to be significant investment to develop and maintain the proposed headline and domestic indicators.

The large geographic extent of this federation and separation of responsibilities for natural resources and other relevant elements of biodiversity in the hands of the provinces and territories mean that biodiversity-related information is scattered in Canada. Attention to this target will encourage better integration of biodiversity priorities into decision-making, particularly in planning and in investment, as well as for monitoring effectiveness of other actions. This target will also be linked to the emerging Nature Accountability Bill.

- Implementation of this target could include a commitment to establish a national inventory for biodiversity information. This could be loosely modeled on the National Pollutant Release Inventory established under the *Canadian Environment Protection Act*. The goal of the Inventory would be to dramatically expand public and governmental evaluation and monitoring of trends in biodiversity, to drive science-based decision making and to support ongoing biodiversity research across the country.
- Develop a mechanism for the 2030 Biodiversity Strategy to adapt based on reporting information.
- Create a State of Canada's Biodiversity reporting committee, modeled after the State of Ontario reporting. Develop and share a 'State of Canada's Nature' report every 2-3 years.
- Breakdown reporting by ecoregion (if province or territory is not possible). Subnational reporting could highlight regional successes, challenges, and important next steps.
- Prioritize funding and training for Indigenous-led monitoring and management of metrics and targets.
- Commit to establishing a National Biodiversity Information Inventory, and/or Atlas, the goal of which would be to dramatically expand public and governmental knowledge of trends in biodiversity, to drive science-based decision making and to support ongoing biodiversity research across the country.
- In addition to traditional biodiversity reporting, social scientists and behavior change experts should be engaged to develop new approaches to messaging the importance of biodiversity conservation to Canadians.
- Provide more easily accessible reporting by supporting information to be given in a clear, concise and summarized manner, therefore allowing less capacity needed to review and information to be more easily digestible and understood by Indigenous peoples and the public.

**Recommendations on Target 21 indicators:**

No comments.

### **Target 22: Ensure Participation in Decision-Making and Access to Justice and Information Related to Biodiversity for all**

*Ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision-making, and access to justice and information related to biodiversity by indigenous peoples and local communities, respecting their cultures and their rights over lands, territories, resources, and traditional knowledge, as well as by women and girls, children and youth, and persons with disabilities and ensure the full protection of environmental human rights defenders.*

#### **Recommendations on Target 22 actions:**

Canada's 2030 Biodiversity Strategy provides an opportunity to display global leadership in recognizing and strengthening the essential role and equitable participation of Indigenous peoples. This will be essential for enabling the transformative change that will be necessary to halt and reverse biodiversity decline in this country.

- Recognize the critical foundation laid by the Indigenous Circle of Experts and their [landmark 2018 report](#) on Indigenous Protected and Conserved Areas “in the spirit and practice of reconciliation” and ongoing Indigenous-led conservation, Guardian, and stewardship efforts across the country.
- Highlight the [Tripartite Framework Agreement](#) on Nature Conservation between Canada, BC, and the First Nations Leadership Council to strengthen conservation efforts and how this could serve as model for future agreements, and [BC's draft Biodiversity and Ecosystem Health Framework](#) as a path to more holistic and inclusive approaches to conservation.
- Include questions on engagement of children and youth, and persons with disabilities and in conservation in polling on biodiversity, conservation, and attitudes towards nature. This should be part of a new biennial Canadian Nature Survey.
- Although there are funding opportunities which are intended for Indigenous peoples, we often see the financial amounts fall short in comparison to other funding opportunities. Knowing that Indigenous peoples are the first to face the direct consequences of climate change and how it impacts their ways of life, larger financial amounts must be allocated to Indigenous peoples to allow for more meaningful participation and capacity building.

#### **Recommendations on Target 22 indicators:**

Four indicators for traditional knowledge were adopted in decisions XIII/28, and 15/22 that should be considered as domestic indicators for Canada's 2030 Biodiversity Strategy:

- **Trends in linguistic diversity and numbers of speakers of indigenous languages.**
- **Trends in land-use change and land tenure in the traditional territories of indigenous peoples and local communities.**
- **Trends in the practice of traditional occupations.**
- **Trends in degree to which traditional knowledge and practices are respected, through the participation of Indigenous Peoples in implementation of Canada's 2030 Biodiversity Strategy.**

### **Target 23: Ensure Gender Equality and a Gender-Responsive Approach for Biodiversity Action**

*Ensure gender equality in the implementation of the framework through a gender-responsive approach where all women and girls have equal opportunity and capacity to contribute to the three objectives of the Convention, including by recognizing their equal rights and access to land and natural resources and their full, equitable, meaningful, and informed participation and leadership at all levels of action, engagement, policy and decision-making related to biodiversity.*

#### **Recommendations on Target 23 actions:**

- We agree with the statement that ‘Canada is well positioned to act as a leader in advancing gender equality through the implementation of all targets’ and are encouraged that the federal government sees Target 23 as an opportunity to advance broader equity. Support for this statement should be included, such as the number of women now in biodiversity leadership positions and enrollment of women in university science programs related to nature and conservation.
- Highlight that Parties also adopted the Gender Plan of Action to “support and promote the gender-responsive implementation of the post-2020 Global Biodiversity Framework” and its associated mechanisms, and how the 2030 Biodiversity Strategy is an opportunity to build on Canada’s efforts related to Women and Climate Change and extend this to biodiversity conservation.
- Include questions on gender equity in conservation in polling on biodiversity, conservation, and attitudes towards nature. This should be part of a new biennial Canadian Nature Survey.

#### **Recommendations on Target 23 indicators:**

These indicators are in development.

Recommended component indicators:

**Proportion of seats held by women in (a) national parliaments and (b) local governments**

Other recommended domestic indicators:

- **Percent of women in biodiversity leadership positions in government and civil society.**