

The BirdLife International Partnership is the world's largest nature conservation Partnership of over 115 conservation organizations around the world. Through our unique local-to-global approach, we deliver high impact and long-term conservation for the benefit of nature and people.

## April 2023

This submission outlines BirdLife International's view on the findings component to the Global Stocktake (GST). We would hope the GST-CO reflects these key findings in its discussions and ultimate outputs including a final COP28 GST decision text. BirdLife International believes the GST must raise the ambition of Parties across all pillars of the Paris Agreement, including across mitigation, adaptation, means of implementation and support, finance flows, loss and damage, science, technology transfer and capacity building, ecosystem conservation and restoration, equity, just transition, gender equality and human rights. Through the GST, BirdLife International would like to see climate justice considered together with the right to a healthy environment and drive recognition and action toward the interconnected biodiversity, poverty and climate crises. These need to be reflected across the GST process and in the political and technical outputs.

### Integrated biodiversity and climate action

The GST should address the need to integrate and align responses to the climate and biodiversity crises. Protecting and restoring ecosystem integrity in and across terrestrial, inland water, and coastal and marine ecosystems is critical to keep global warming to 1.5°C; limiting and adapting to the inevitable climate impacts and stop biodiversity loss.

The Convention on Biological Diversity (CBD) in its 5th Global Biodiversity Outlook (GBO-5) and the IPBES Global Assessment Report (2019), showed a lack of progress of Parties on many fronts, including on the synergies between the biodiversity and climate agendas, although some advances have been noted in including nature in nationally determined contributions (NDCs.) Both reports also identified the key elements for enhancing such synergies and both the Glasgow Climate Pact and Sharm el-Sheikh Implementation Plan recognised the role of nature and nature-based solutions for climate action.

Concerningly, recent science indicates that some mitigation efforts and 1.5°C emission reduction pathways risk overstepping ecological planetary boundaries by accelerating land-conversion and biodiversity loss in some locations. Furthermore, a recent IPCC-IPBES Biodiversity and Climate Change Workshop report<sup>1</sup> warned that addressing climate change and biodiversity loss separately may lead to actions that inadvertently prevent the solution of one or the other, or both issues.

**The GST should therefore assess the extent to which Parties are aligning climate and biodiversity action in implementing the Paris Agreement, as well as highlight the key knowledge and policy gaps that need to be filled to help guide more coherent and integrated near and long-term planning, including aligning monitoring and reporting across the UNFCCC and CBD conventions.**

Looking forward, the GST could provide recommendations to overcome these gaps. These could include, for instance (i) inviting the IPCC and the IPBES to work on a joint Special Report on climate and biodiversity to address some key research gaps (building from their recent co-sponsored workshop report); (ii) requesting the SBSTA to undertake a work programme on how to deliver and account for integrated climate and biodiversity outcomes; and (iii) requesting the SBI to work on specific guidelines for enhancing

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<sup>1</sup> [https://www.ipbes.net/sites/default/files/2021-06/20210609\\_workshop\\_report\\_embargo\\_3pm\\_CEST\\_10\\_june\\_0.pdf](https://www.ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf)

domestic alignment between NDCs and NBSAPs. BirdLife also has a number of suggestions for the GST process to address climate and biodiversity integration:

1. **The GST must consider a role for nature that enhances not undermines ambition in reaching Paris Goals.** At TD1, Parties were invited to consider [guiding question 20] how they are recognising the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity. BirdLife International welcomes that Parties were considering the role of ecosystems in their discussions, which reflects our previous GST input that Parties should be conducting an assessment of their contribution to reaching the Paris Agreement goal. However, BirdLife International is concerned to note that some contributions from Parties reflected an approach that potentially undermines rather than enhances ambition, for example, through the use of biofuels or monoculture crops. To enhance ambition for mitigation and adaptation, and to meet the goals of the Paris Agreement the contribution of nature must take into account the latest evidence on the critical nature of addressing the biodiversity and climate crises in tandem including from IPCC WG 3 Chapter 7 regarding 'ecosystem protection offering the highest total and per hectare mitigation value'; the 'irrecoverability of carbon dense ecosystems by 2050'; and 'the high synergies between biodiversity and carbon density in primary forests and other primary ecosystems'.
2. **The GST should evaluate and make recommendations towards an approach that accounts for ecosystem integrity.** Land use accounting was much discussed by experts in the technical dialogues on mitigation and gaps and loopholes in the current accounting approach were acknowledged. It is clear current approaches fail to reflect ecosystem integrity and therefore the long-term ability of ecosystems to lock up carbon and maintain/increase resilience for adaptation. BirdLife International proposes that Parties assess the role and potential adoption of the UN-SEEA accounting approach through the GST to address the issues raised in TD1. This has already been adopted by over 90 countries and G7 Ministers also recently committed to implement it.
3. **The GST should note the information gaps in current UNFCCC rules needed to guide priorities for the role ecosystems can play in NDC's** in particular lack of information on ecosystem integrity and the functional importance of natural patterns of biodiversity for ecosystem integrity, stability, resilience and ability to adapt, and reducing risk of loss, that could be filled over time by robust implementation of the UN SEEA.
4. **The GST should reflect the importance of Indigenous Peoples engagement** and consider the evidence such as the Falling Short report by the Rainforest Foundation that highlights how little finance is directed to Indigenous Peoples. This issue was increasingly raised in the first Technical Dialogues but while rhetoric is improving, on the ground the report highlights much needed change in direction.

**Sources of information:** Those included in the references in this section (in particular, the IPCC-IPBES workshop report). The SDGs, the IUCN, the CBD and the Sendai Framework for Disaster Risk Reduction, among others, are examples of other international forums that could provide insights with the related reporting efforts for this cross-cutting issue.

### **Fulfilling the Paris mandate on natural land and ocean sinks and reservoirs (Article 5)**

The current GST proposals do not consider progress on Article 5 and this urgently needs to be addressed. Maintaining and restoring the integrity of ecosystems is important for ecosystem stability, adaptive capacity and long-term carbon storage. The recently published IPCC Working Group 1 report outlines that natural land and ocean sinks have respectively absorbed 31% and 23% of anthropogenic carbon emissions over the last decade. The IPCC WG1 report also outlines that land and ocean sinks are degrading, suffering the consequences of increased temperatures, and losing their ability to support mitigation and adaptation efforts. The integrity of reservoirs is impacted by fragmentation and loss of biodiversity. Just 3% of the planet's ecosystems are intact.

As mandated by 19/CMA.1 paragraph 26(a), the GST should consider the state of greenhouse gas emissions by sources and removals by sinks and mitigation efforts undertaken by Parties, including the information referred to in Article 13, paragraph 7(a), and Article 4, paragraphs 7, 15 and 19, of the Paris Agreement. **We propose an assessment of Parties' progress in implementing Article 5 of the Paris Agreement.**

**Sources of information:** Biennial Reports (BRs), Biennial Update Reports (BURs), National GHG inventories, as well as independent sources and monitoring tools such as Global Forest Watch or Global Mangrove Watch.

### **Assessing the adequacy, loopholes and perverse incentives arising from accounting and rules in the LULUCF sector**

It is crucial that the GST assesses the nature, magnitude and scale of accounting loopholes and perverse incentives in the UNFCCC and suggest ways for Parties to overcome them:

a. Carbon losses from changes in ecosystem condition: The LULUCF accounting framework under the Convention focuses only on net carbon flows, missing the importance of ecosystem integrity and stability. This stability is crucial for reducing ecosystem breakdown and the resulting release of huge volumes of carbon. The current definition of “forest” also does not differentiate between biodiversity-rich stable ecosystems and heavily degraded or plantation forests, leading to incentives for Parties to degrade or convert these, with negative consequences for both the climate and biodiversity. Therefore, to address this the GST could propose for Parties **to adopt the UN ‘System of Environmental Economic Accounting - Ecosystem Accounts’ (SEEA-EA), which constitutes a comprehensive statistical framework for integrating measures of ecosystem integrity and the flows of services from them with measures of economic and other human activity.** An application of this system to carbon accounting in forests has also been elaborated and published.

b. Substantial unaccounted emissions: current LULUCF policies and accounting systems used by Parties are leading to unaccounted greenhouse gas emissions - failing to reflect emissions the atmosphere receives and sub-optimal decisions regarding ecosystem protection and management on land and in water. This is particularly the case for forests harvested for bioenergy. A lack of transparency and the use of projected business-as-usual baselines for forest harvesting emissions obscures the full impact of harvesting on emissions, the payback time for forest recovery, and the mitigation benefits of the counterfactual (i.e. forest protection) creating an illusion that it is acceptable to count emissions from burning wood as zero in the energy sector. As an example, recent analysis found that unaccounted emissions from the international trade of wood pellets alone has the potential to reach 69.52 MtCO<sub>2</sub>e/year in 2050. Without addressing the LULUCF accounting system to include currently missing emissions, we cannot assess collective progress towards the Paris Agreement goals. **The GST should assess these perverse outcomes including the magnitude of unaccounted emissions and recommend solutions, for example** at a minimum, Parties should report on how they have aligned their accounting with trade partners to ensure bioenergy emissions are included, as suggested in the 2019 IPCC Refinement.