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Your excellency,

On behalf of the Global Forest Coalition, a worldwide coalition of 119 Indigenous Peoples' Organizations, women's groups and NGOs from 71 different countries, I would like to thank you for your invitation of 13 December 2021 to provide comments on the first draft of the Ministerial Declaration for UNEA 5.2. Together with our allies in the Women's Major Group and regional caucuses we have already provided some inputs on the zero draft, but we would like to make use of this opportunity to share a few brief observations regarding this first draft.

1. Our main observation is that while we appreciate the intention of the declaration to highlight the importance of conserving the world's natural ecosystems, we are afraid that the actual text of the declaration might undermine rather than reinforce the Convention on Biodiversity (CBD) and the significant package of policy guidance the Parties to the CBD have produced during the past 29 years. We are particularly concerned about the frequent use of the term "nature" when a reference to "biodiversity" or "ecosystems" would be more correct from a perspective of legal consistency. The CBD was deliberately entitled the Convention "on Biodiversity" and not a Convention on "Nature", as biodiversity is a clearly defined concept that can be measured through concrete indicators. The concept of "nature" is not well-defined and could include monoculture plantations of exotic species, which prevent areas to regenerate into more biodiverse ecosystems. The promotion of concepts like "nature" and "Nature-based solutions" might thus lead to activities that undermine biodiversity and the CBD regime. We recommend using concepts like the "ecosystem approach" instead, which are non-controversial, well-defined, and broadly supported by both Governments and major groups.
2. We would also want highlight that the Parties tot the CBD have clearly recognized the role and rights of Indigenous Peoples, local communities and women in biodiversity conservation, and the value of Indigenous Peoples' and local communities conserved territories and areas and other community conservation initiatives. We are very concerned that this important recognition is lacking in the draft declaration.
3. We appreciate the scientific work of UNEP in the field of addressing unsustainable livestock production and consumption, which is at the heart of sustainable food systems. In light of the significant impact of unsustainable livestock farming on forests and other ecosystems, the climate, and for example nitrogen dispositions, a reference to the need to address unsustainable livestock farming, including through dietary change, should be included in the draft declaration.
4. Lastly, we are concerned that the current declaration undermines the Sustainable Development Goals, and its target 15.2, as it only refers to reducing deforestation and forest degradation, while the world's Heads of State have already committed in 2015 to halt deforestation and forest degradation by 2020. This is a regression we cannot afford.

We hope these legal and technical suggestions will be taken into account in the further development of the ministerial declaration.

Sincerely yours,

Simone Lovera