

Convention on Biological Diversity Call for Evidence: Options to enhance cooperation and policy coherence to support the implementation of the Convention on Biological Diversity and the Kunming-Montreal Global Biodiversity Framework, and the United National Framework Convention on Climate Change and the Paris Agreement

Response from the British Academy

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About the British Academy

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About this submission

This submission represents the views of the British Academy, with particular input from Professor Harriet Bulkeley FBA, Professor Melissa Leach FBA and Professor Nathalie Seddon, Hugo Clarke, Rachel Ellis, Philip Lewis and Paige Strigel. We would be pleased to further discuss any elements of the response.

Acknowledgements

The Academy wishes to acknowledge the very helpful discussion and feedback in developing this submission that came from participants at a roundtable that took place at the Academy on 31 March 2025 with a range of researchers, practitioners and policymakers, including Laura Kelly and Audrey Wagner.

We wish to emphasise that the SHAPE disciplines (Social Sciences, Humanities and the Arts for People and the Economy), represented by the British Academy, can support the Secretariat and others involved in the process of seeking to develop policy coherence in tackling these challenges and ensuring that critical social, cultural, economic, political and ethical issues are considered in the processes of technical exchange and policy design that are envisaged for the next steps in this process.

The perspectives offered here in response to the call from the CBD Secretariat for views “**on options for enhanced policy coherence, including a potential joint work programme of the Rio conventions**” are based on exchanges that took place at a workshop organised by the British Academy in March 2025. The intention was to gather the views of researchers, NGOs and government on the potential for enhancing synergies in addressing the critical challenges of climate change and biodiversity loss in the context of realising sustainable development and social and ecological justice.

From these deliberations, we have distilled five key points for consideration by the CBD Secretariat, the Joint Liaison Group of the Rio Conventions, SBSTTA and the executive secretaries of the Rio Conventions as they seek to consider how to develop policy coherence between the Rio conventions and establish the technical support mechanisms to make this work successful.

- 1. Determine the purpose and form of policy coherence *before* new processes to achieve it are designed.**
- 2. Focus on root causes of climate change and biodiversity loss and address social justice & human rights.**
- 3. Avoid a ‘pick and mix’ approach to policy coherence by adopting an ‘all inclusive’ approach.**
- 4. Build knowledge and capacity for a whole-of-society implementation of the policy coherence agenda.**
- 5. Establish safeguards and standards to ensure integrity and avoid unintended consequences.**

Each of these key points is elaborated further below.

Establishing the purpose of policy coherence

The case for aligning action on climate and biodiversity is strong, and clearly set out in Decision 16/22. We fully endorse the critical and urgent need to make progress on climate and biodiversity, and are encouraged by the prospect of generating greater policy coherence across the Rio conventions in order to do so. At the same time, we suggest that the *purpose* of policy coherence and especially *the form of synergy it seeks to generate* needs to be established *before* specific proposals for particular processes or mechanisms of coherence are designed and implemented.

This is important because, despite coordination between UNFCCC and CBD being proposed since 2001, limited progress has been made on deeply integrating their work. An evaluation on why progress has been limited could help identify key issues and develop a clear path forward for policy coherence. At the same time, a greater focus on what kind of policy coherence is needed, why and for whom, could help to generate greater traction.

We suggest that **a central task of a joint work programme would be to firmly establish the *kind of alignment and synergy between climate and biodiversity*** that is being sought.

One form of synergy, for example, can be found where units of ‘biodiversity’ and units of ‘climate’ are made into tradeable commodities that can be exchanged (for monetary compensation) and ‘banked’ as assets. We urge caution in creating policy coherence that would or could generate momentum for the creation of new market-based approaches for climate and nature. A second form of synergy that carries significant risks would involve the ‘strategic separation and intensification’ of actions for climate and for biodiversity, in which both are pursued but with little consideration for their wider implications – e.g. to set aside land for carbon sequestration or bioenergy production on the one hand, and land for conservation and restoration goals on the other, but without considering the overall impacts on food, sustainable development or social and ecological justice. This form of parallel coherence – where actions in one policy arena do not prevent actions in another – would sustain existing siloed governance structures and serve to further entrench the interests of some at the expense of achieving sustainable development for all.

A third form of synergy focuses on the explicit integration of climate and biodiversity through policy and action that delivers multiple benefits for each challenge. The Kunming-Montreal Global Biodiversity Framework (KMGBF) has an explicit focus on this form of coherence, in particular through Targets 8 & 11 and the inclusion of nature-based solutions and ecosystem-based approaches as a means through which integration can be realised. While welcoming the inclusion of these mechanisms for supporting coherent action across the Rio Conventions, we caution that synergy itself should not be siloed in some part of the KMBF or left to nature-based solutions alone. Further, an integration-based approach to coherence runs the risk of ignoring or downplaying tensions and trade-offs between different forms of action. We suggest that a joint work programme/technical support processes may wish to consider how to ensure that trade-offs are more explicit, and that transparent, inclusive and just decisions are taken when choices are needed between competing priorities, e.g. addressing the need for resilience and development for poor urban communities through new housing or infrastructure and the reduction of land set aside to meet 30/30 conservation or restoration targets.

A final form of synergy, and one which we would suggest best fits the goals of the Rio Conventions, would focus on *mutual amplification* – how can policies, processes, action and learning in one domain amplify and catalyse those in another such that the overall outcomes are greater than the sum of the parts? Rather than focusing only on direct measures where climate and biodiversity goals can be achieved simultaneously, this approach to coherence could involve: tackling root causes and issues of justice; taking an all-inclusive approach which recognises the different aspects of both the climate and biodiversity challenges; ensuring that a whole of society approach is taken and used to operationalise policy coherence; and that safeguards and standards are in place to ensure that ‘red lines’ for nature and climate are not crossed.

Including root causes and matters of justice

At the heart of calls for greater coherence between the Rio conventions, as recognised in CBD Decision 16/22, is the growing understanding that neither the biodiversity nor climate challenges can be addressed without the other. This in part reflects the biophysical processes that link the two challenges. It is also because both are fundamentally connected to the same root causes, notably: the continued exploitation and use of fossil fuels; the overconsumption of

food, land and resources; inequality; a lack of security or access to sustainable livelihoods; unsustainable economic production, waste and pollution; and a deep disconnection between nature and society. These issues must be at the heart of any efforts to generate policy coherence if it is not only to create synergy that successfully amplifies and catalyses greater alignment but also *delivers progress towards both climate and biodiversity goals*. We **suggest that any joint work programme specifically includes a focus on addressing the underlying drivers of climate change and biodiversity loss** and seeks to identify key drivers (e.g. plastic use and pollution, fertilisers, subsidies, food waste) around which joint actions can be undertaken, working with a whole of government and whole of society approach, and potentially drawing on the ‘Glasgow Breakthrough’ approach championed by the UK Government at COP26 (see: <https://breakthroughagenda.org/>).

Underpinning both the root causes of climate change and biodiversity loss and their impacts for society and nature are matters of justice. Successive global assessments from the IPCC and IPBES have pointed to the critical importance of ensuring that action for climate and biodiversity is undertaken not only in ways that are themselves just and inclusive, but also such that they address both past injustices and recognise current justice claims and human rights. Too narrowly framed, policy coherence between the Rio conventions could lose sight of the critical need to address social and environmental justice. This is not only motivated by ethical concerns, but also the necessity to address the distribution of risks and benefits, the processes through which decisions are made, and the recognition and repair of past injustices and current inequalities. Without attending to these issues, progress for climate and biodiversity is likely to be limited. There is important potential here for the progress that the CBD has made in recognising and including Indigenous People and Indigenous Knowledge in policy processes, decisions and outcomes to be also taken up within the UNFCCC. At the same time, for too many communities in urban and rural places whose lives and livelihoods are likely to be affected by measures which seek to address climate and biodiversity concerns, due recognition of their knowledge, rights and values remain marginal. Without explicit inclusion of issues of justice and human rights in a joint work programme, there is the risk that action for climate and biodiversity might be accelerated without due consideration of its consequences and in turn serve to entrench inequalities, insecurity and vulnerability. We **recommend that any joint work programme for increasing policy coherence should be informed by an understanding of how issues of justice and human rights also need to be incorporated into the design of procedures or programmes**, in keeping with the KMGBF Targets 22 & 23.

All-Inclusive Approach

The promise of creating greater policy coherence between the Rio Conventions lies in the potential to make visible the ways in which action in one domain can amplify and catalyse others, while also making the tensions and trade-offs between diverse goals more transparent.

To date, many discussions on developing more integration have focused on particular *parts* of the climate issue (e.g. mitigation or adaptation) and their integration with specific forms of biodiversity action (e.g. nature-based solutions, restoration, conservation). This ‘pick and mix’ approach may mean that Parties and other actors engaged in global environmental governance (e.g. urban and regional authorities, businesses, NGOs, MDBs etc.) are selective in where they do (and do not) seek policy coherence or alignment. It may also lead to claims that integration or synergy have been achieved where in reality some policy areas and project implementation are still conducted without consideration for the other Rio conventions. At worse, such an approach to policy coherence may serve to entrench unjust power dynamics and instrumentalize

people and nature in the interest of climate goals—for example, through 'green grabs' and focusing on single-site energy solutions like carbon capture/offset and tree-planting, to the detriment of biodiversity.

To avoid this, we ***suggest that any joint work programme must ensure that policy coherence is addressed in an 'all-inclusive' manner – ensuring that all aspects of the climate issue, including loss and damage alongside adaptation and mitigation are considered in relation to the different goals and targets of the CBD KMGBF.*** This may also require new processes of monitoring and reporting, such that actions undertaken towards one specific climate issue or biodiversity target also need to recognise or reflect on where they have a positive, neutral or negative contribution towards another. For example, this could entail requiring parties to the UNFCCC to consider the contribution policies and measures are having for biodiversity, particularly the quality of forests and other carbon sinks, in their Nationally Determined Contributions (NDCs). Such an approach would also enable the tensions and trade-offs that accompany efforts to create more coherence and synergy to be explicitly acknowledged, creating space for democratic dialogues over social priorities and allowing space for contestation.

Whole of Society Implementation

As set out in the KMGBF and the Paris Agreement, meeting our goals for biodiversity and climate requires a 'whole of society' approach in which multiple actors across all levels of government and from the private sector and civil society are engaged in pursuing action. A joint work programme that focuses on policy coherence that too narrowly interprets the action space as one shaped by Parties in specific elements of each Convention runs the risk of failing to harness the knowledge and support of the wide range of actors who are already involved in undertaking aligned action for climate and biodiversity, and of ensuring that they are empowered to take further action.

The technical exchange planned to support the joint work programme could, for example, harvest lessons on how different actors and institutions are currently pursuing coherent policies for climate and biodiversity, how progress to these goals is monitored, reported and evaluated, and how trade-offs and tensions are addressed. This could provide a valuable evidence base for Parties and other actors how they might develop aligned approaches for national policy and reporting (e.g. in NDCs, NAPs, NBSAPs) or key leverage points where policy coherence can be backed by action. A critical entry point here will be the development of aligned systems of monitoring, reporting and evaluation. There is a danger that the drive for coherence will be equated with gaining efficiencies through reducing the depth and level of reporting required, but it is essential that even while alignment is sought, metrics and monitoring should maintain complexity and nuance, recognising the stakes for different groups of people. Moving towards systems of monitoring and evaluation that make clear where policies are or are not contributing to the goals of climate change or of biodiversity respectively will also ensure transparency in terms of priority setting and potential missed opportunities to be pursued.

Diverse actors across the whole of society are already also pursuing both climate resilient development and nature positive pathways – understanding how these actors are successfully bringing these into alignment could provide important examples to support the design and implementation of policy coherence across scales and between different actors. This will be an important part of the capacity building and alliance development needed to ensure that any efforts at policy coherence started within the Conventions can be realised in practice. ***A joint***

work programme could consider how such knowledge and best practice can be captured and shared, perhaps through a platform or initiative such as those supported under the Race to Zero or Race to Resilience in the UNFCCC or the CitiesWithNature and RegionsWithNature in the CBD. Positive stories of change can provide an effective means of connection and can generate alliances willing to support the pursuit and implementation of policy coherence, especially through sharing narratives and strategies of powerful movements from below. This pragmatic political strategy could open the door for generating transformative change in how these agendas are aligned ‘from the bottom up’ even while policy coherence is being sought. It can also be a means of showcasing and prioritising rights-centred solutions for the intertwined crises of nature loss and climate change and enabling the development of grassroots alliances who are empowered to address power imbalances and obstructionism in pursuing aligned climate, biodiversity and social justice work.

Safeguards and Standards

The drive towards policy coherence and synergy should not undermine the importance of addressing critical issues of biodiversity loss or of climate change. Full ‘fungibility’ across the climate and biodiversity domains could mean that accountability for meeting specific goals and targets in relation to each issue area is lost as progress on one is traded off against a lack of progress in another. Likewise, many Parties have raised concerns that bringing these issues into closer alignment will lead to ‘double counting’ such that donors will be expecting to reduce their financial commitments while also requiring Parties to realise ‘two for the price of one’ benefits.

These concerns mean that the joint work programme will need to consider safeguards and standards that can reassure Parties and other stakeholders that there are minimum thresholds for action on each of climate change and of biodiversity, and also ‘red lines’ that cannot be exceeded in order to progress action in one domain at the expense of another or where issues of social and environmental justice or sustainable development for all are disregarded. One approach might be to identify priority areas for policy coherence in which bespoke standards and safeguards could be applied. Such priority areas might include key ecological systems or economic sectors, such as mangroves or forests, where thresholds for ecosystem integrity and priorities for protecting existing ecosystems over restoration efforts amongst other concerns could be developed into policy guidance or standards that would be required to be used by all Parties in developing e.g. their NDC or NBSAP. Another set of priority concerns might be related to how far policy coherence supported action that ensured and enabled access to critical services and infrastructure, for example social infrastructures that support development including healthcare and education, or physical infrastructure such as mobility or housing. Such outcome-based assessment of the impact of policy coherence would help to sustain political support and engagement from a ‘whole of government’ perspective and could also be used as a means of safeguarding the impact of such an approach on sustainable development goals. A third area for the development of standards and/or safeguards might relate to the principle of ‘do no harm’, such that strategies and action designed to implement policy coherence across climate/biodiversity could be tasked with reporting on their consequences for key societal risks, such as displacement, loss of livelihood, increased insecurity etc. Putting such measures in place, even on a voluntary basis, would ensure that there is space for deliberating the potential and risks of bringing climate and biodiversity policy into alignment and ensuring that issues of development, justice and human rights are kept front and centre of the decision-making frameworks through which policy coherence is pursued on the ground.

We look forward to the results of this consultation and to working together to enable the goals of climate and biodiversity policy to be met.