

Peer Review of the Draft Global Report on Collective Progress in the Implementation of the Kunming-Montreal Global Biodiversity Framework

CBD Women's Caucus submission
June 2026

The CBD Women's Caucus, on behalf of its more than 800 members across 137 countries, submits the following comments as part of the peer review of the Draft Global Report on Collective Progress in the Implementation of the Kunming-Montreal Global Biodiversity Framework, as invited under Notification 2026-047 (peer review period: 2-29 June 2026). These comments reflect the Caucus's long-standing advocacy for a gender-responsive, rights-based, and intersectional approach to KM-GBF implementation. They are organised by section of the Global Report and focus primarily on strengthening the report's treatment of gender justice, women's rights, disaggregated data, and the meaningful participation and leadership of women and girls in all their diversity, including from Indigenous Peoples, local communities and Afro-descendant peoples.

General

Comment 1 | General

Gender justice (equality and equity) is a foundational condition for the successful implementation of the KM-GBF, not merely an aspirational consideration. It is important to send a strong message that a gender responsive implementation of the GBF will not succeed without addressing structural gender inequalities that limit women's participation, access to resources, and decision-making power in biodiversity governance.

Comment 2 | General

The collection of disaggregated qualitative and quantitative data remains a huge gap and is urgently needed. More capacities and resources need to be invested. Without disaggregated quantitative and qualitative data, it is impossible to measure whether women, men, and diverse groups are benefiting equitably from biodiversity actions or bearing disproportionate costs.

Comment 3 | General

Equitable, accessible, and sufficient. It is essential to guarantee women's access to funding and ensure that this funding is traceable. The report's findings indicate that a gap still exists and that current funding mechanisms often exclude women-led organizations (NGOs, networks, collective groups) due to structural barriers such as: lack of formal property titles, limited access to banking services, gender discrimination, exclusion due to lack of legal representation or legal registration of the organizations in "official" registries, and that at its core this is due to a legal vacuum and the failure to register new types of women's organizations such as networks, groups, collectives, communities, etc., because they are considered "informal"

Comment 4 | General

Substantive participation should be a right and "not tokenism". The Report identifies that engagement of rights holders, including women, by Parties is still limited and that whole-of-society is still inconsistent. More needs to be done in terms of ensuring full and effective participation of women in biodiversity-related policy and decision-making. Quotas and of women in decision-making bodies does not automatically translate into substantive participation, fair representation and decision-making authority. Capacity-building, peer learning and mentorship are needed.

Comment 5 | General

Synergies with Rio Conventions on gender aspects and workplans and Coordination with gender equality frameworks like CEDAW is essential and can be strengthened in the text of the Report under target 23.

Comment 6 | General

The Global Report should make explicit reference to the mid-term review of the Gender Plan of Action (GPA), especially referencing relevant case studies and encourage learning exchanges to improve gender-responsive action of the GBF

Comment 7 | General · *[general]*

The report overall does an excellent job of synthesizing a vast amount of information on collective progress toward the Framework. However, we note that references to gender equality and gender-responsive approaches are often procedural (e.g., noting that Parties report progress on gender-responsive frameworks) rather than substantive (e.g., analyzing the impact of gender inequalities on biodiversity outcomes). We recommend that the final report include more substantive analysis of how gender inequalities affect biodiversity conservation and sustainable use, and how addressing these inequalities can accelerate progress toward the Framework's targets.

Summary

Comment 8 | Summary · p.14 l.14 → p.14 l.23 · *[text]*

There is definitely a gap in the overarching key messages. The summary highlights the failure to implement approaches to the "whole of society", but it's omitting explicit mention gender equality or any distinct barriers women face in biodiversity governance. They should add explicitly in a sentence that in order to achieve Target 23, there is a barrier among the lack of gender approaches and planning, and specific data.

Comment 9 | Summary · p.15 l.16 → p.15 l.25 · *[text]*

The summary emphasizes the importance of whole-of-society and whole-of-government approaches but does not explicitly name gender equality as a critical cross-cutting condition for success. Given that Target 23 specifically addresses gender equality, the summary should include a clear reference to the fact that implementation cannot succeed without addressing structural gender inequalities that limit women's participation, access to resources, and decision-making power in biodiversity governance.

Comment 13 | Summary · p.21 l.1 → p.23 l.3 · *[general]*

The "Data and information gaps persist" section mentions limited disaggregated data but does not specifically call out the absence of gender-disaggregated data as a critical gap. This omission is significant because without sex-disaggregated data, it is impossible to measure whether women, men, and diverse groups are benefiting equitably from biodiversity actions or bearing disproportionate costs. The report should explicitly identify this gap and recommend that future national reporting prioritize the collection and use of gender-disaggregated

I.A - GBF and global report

Comment 14 | I.A - GBF and global report · p.30 l.27 → p.30 l.29 · *[text]*

Section C of the Framework includes cross-cutting considerations that emphasize inclusive and participatory action, including the recognition of women and youth. However, the introductory section of the global report should more strongly underscore that these considerations are not merely aspirational but are foundational to the success of the Framework.

The text could be strengthened by noting that the failure to adequately integrate gender-responsive approaches has been identified as a key barrier to achieving previous biodiversity targets (e.g., Aichi Targets) and that this lesson must inform current implementation. The report should explicitly acknowledge this lesson and call for gender-responsive approaches to be treated as a non-negotiable condition for achieving the 2030 targets.

I.B - Status of and trends in biodiversity

Comment 15 | I.B - Status of and trends in biodiversity · p.46
l.12 → p.46 l.47 · *[text]*

The report references the IPBES Values Assessment, which concluded that better data and information alone will not shift societies toward addressing biodiversity loss; rather, a change in how societies define value, progress, and development is required. The report should explicitly connect this finding to gender equality, noting that traditional economic models often fail to recognize the unpaid care work and subsistence contributions of women, which are essential to biodiversity conservation and sustainable use. Including this perspective would strengthen the report's alignment with the Framework's whole-of-society approach.

II.A - NBSAPs, NTs and NRs

Comment 10 | II.A - NBSAPs, NTs and NRs · p.17 l.10 → p.17 l.13 ·
[general]

The report acknowledges that IPLCs, women, and youth often lack the resources to contribute effectively to nature conservation and recovery. To address this, we recommend the following consolidated actions: (a) Call upon GEF, UNDP, and UNEP to make the tracking of gender-disaggregated metrics for funding mechanisms a mandatory requirement for all future national reporting; (b) Specify that disaggregation of financial flows must be by gender, to ensure funding reaches women's organizations on the ground; (c) Require that national reporting includes information on the proportion of biodiversity finance reaching women-led initiatives and grassroots women's organizations. Without such measures, financial flows will remain invisible, untraceable, and impossible to improve over time; (d) Create a dedicated platform to track specifically for women-led biodiversity initiatives within the normal architecture; (e) Urge Parties to integrate gender-responsive budgeting into their upcoming national biodiversity finance plans to prevent women-led conservation from systematically underfunded.

Comment 11 | II.A - NBSAPs, NTs and NRs · p.17 l.28 → p.17 l.31 · [general]

The document states that breaking down financial flows makes easier to track, visualize and trace over time resources. The text needs to be explicit to specify gender disaggregated financial flows to ensure that this funding reaches women's organisations on the ground.

Comment 12 | II.A - NBSAPs, NTs and NRs · p.19 l.16 → p.53 l.21 · [general]

Implementation can be enhanced by firstly investing in peer to peer learning at National Level which will then feed into the regional and sub-regional peer to peer learning. Sub regional technical and scientific cooperation centres should consist of indigenous knowledge systems to enable local people participate effectively and ensure that indigenous knowledge is not over shadowed by academic research and knowledge which seems too scientific and complex for local communities.

II.B - Implementation of global targets

Comment 17 | II.B - Implementation of global targets · p.56 l.5 → p.61 l.10 · [text]

Under Target 1, the report notes that fewer than half of Parties ensure that spatial planning processes are participatory, integrated, and respectful of the rights of indigenous peoples and local communities. We recommend adding a specific observation that women's participation in these processes is often tokenistic or absent, even when indigenous peoples and local communities are nominally included. The report should call for explicit attention to women's roles in spatial planning and land-use decision-making, particularly given that women often have distinct knowledge of and reliance on local ecosystems. We recommend adding as well, that women frequently bear the disproportionate socioeconomic burdens of illegal degradation and environmental conflict, and must be included in local environmental enforcement frameworks.

Comment 18 | II.B - Implementation of global targets · p.72 l.30 → p.73 l.1 · [text]

For Target 3, the report notes that few Parties address whether protected areas and OECMs are equitably governed or recognize the rights of indigenous peoples and local communities, including over their traditional territories. This is an opportunity to highlight that equitable governance is impossible

Without ensuring women's full and meaningful participation, including their rights to land and resources. The report should recommend that future NBSAPs include specific provisions for women's representation in governance bodies and recognition of their customary rights.

**Comment 19 | II.B - Implementation of global targets · p.81 l.17
→ p.82 l.1 · [text]**

Under Target 4, the report addresses human-wildlife conflict as a key element. Women often bear a disproportionate burden of human-wildlife conflict, as they are frequently responsible for collecting water, firewood, and other resources from areas where conflicts occur. The report should note that gender-responsive approaches to human-wildlife conflict management, such as involving women in early warning systems and conflict mitigation strategies, can improve outcomes for both communities and wildlife. Also, the text should highlight that women frequently manage small-scale livestock and localized agrobiodiversity that needs to be overlooked, along with recommendations for seed bank frameworks that protect women's free, prior, and informed access.

Comment 20 | II.B - Implementation of global targets · p.93 l.1 → p.93 l.6 · [text]

Under Target 5, the report notes that only 53 per cent of Parties address the element of respecting and protecting customary sustainable use by indigenous peoples and local communities. We recommend adding a specific observation that women's customary rights and knowledge are often overlooked in these frameworks, even though women are frequently the primary users and managers of wild species for food, medicine, and household needs. The report should call for explicit recognition of women's customary sustainable use practices in national target-setting.

Comment 21 | II.B - Implementation of global targets · p.115 l.116 → p.115 · [general]

The demand for critical minerals such as gold which is needed to support technology and artificial intelligence has increased the number of artisanal and small-scale miners in Southern Africa. However, the use of mercury in gold panning has led to pollution of water sources. In Zambia, Muchinga Province is one of the area's where rivers are being polluted as a result of gold panning. There is need to ensure that Target 7 is aligned with Environmental Impact Regulations of Countries. In many countries, the Environmental Agencies are in charge of both Environmental Regulations and implementing the Minamata Convention, however, there is no coordination when it comes to enforcement. Implementation of Target 7 aligns with restoration using environmentally friendly methods such as phytoremediation; hence such concepts need to be

**Comment 22 | II.B - Implementation of global targets · p.120
l.121 → p.120 · [general]**

Climate Change cuts across the three Rio Conventions, although it is widely addressed through the UNFCCC and the National Determined Contributions and National Development Plans at National Level. The National Biodiversity Strategy and Action Plans need to strengthen its implementation of Target 8 by setting aside dedicated funds for climate change mitigation and adaptation in ecological sensitive areas such as forests, which form a basis for carbon trade and wetlands which support biodiversity and livelihoods. This target also offers an opportunity for indigenous knowledge systems to be used in programs such as early warning. Most local communities still hold knowledge which enables them to tell when they will be drought, when the rains will start and when there will be abundance fish. Through indigenous knowledge, fishing communities know when or not to go on the lake for fishing. Climate finance should include traditional learning platforms such as story telling cycles, "Indabas". Nature Based Solutions should be considerate of indigenous farming methods such as composting and slash and burn. Education and Learning under Target 8 should be aligned with the Action for Climate Empowerment - ACE program under the UNFCCC which calls for climate education to be integrated in education curriculum.

**Comment 23 | II.B - Implementation of global targets · p.124 l.5
→ p.124 l.9 · [text]**

Under Target 9, the report notes that fewer than half of Parties address the element of protecting and encouraging customary sustainable use by indigenous peoples and local communities, and even fewer address benefits for people in vulnerable situations. The report should explicitly note that women, particularly indigenous women, are among the most dependent on biodiversity for their livelihoods and are disproportionately affected when these protections are lacking. We recommend that the report call for specific measures to recognize and support women's customary sustainable use rights.

**Comment 24 | II.B - Implementation of global targets · p.131 l.0
→ p.147 l.0 · [general]**

Target 10 (pp.131-147) covers agriculture, aquaculture, fisheries and forestry, the sectors where women's labor is most concentrated globally and there isn't a single mention of gender or women across all 16 pages.

**Comment 25 | II.B - Implementation of global targets · p.147 l.1
→ p.147 l.8 · [text]**

Under Target 11, the report addresses nature's contributions to people, including ecosystem functions and services such as pollination and food provision. Women play a central role in these contributions, particularly in small-scale agriculture, food processing, and household resource management. The report should explicitly recognize that gender inequalities can limit women's ability to benefit from these contributions and that empowering women as stewards of biodiversity can enhance ecosystem resilience and human well-being.

**Comment 26 | II.B - Implementation of global targets · p.171 l.1
→ p.171 l.8 · [text]**

Under Target 14, the report notes that the integration of biodiversity and its multiple values into poverty eradication strategies is addressed by only 20 per cent of Parties. This is a critical gap, as women represent a disproportionate share of the world's poor and are often most dependent on biodiversity for their livelihoods. We recommend that the report call for the explicit integration of gender-responsive poverty eradication strategies into NBSAPs, recognizing that biodiversity conservation and sustainable use are essential pathways out of poverty for women and their communities.

**Comment 27 | II.B - Implementation of global targets · p.230 l.0
→ p.230 l.0 · [text]**

While the draft appropriately highlights the value of traditional knowledge under Target 21, Section II.B (Target 22) must explicitly distinguish and protect the unique roles, land tenure barriers, and spatial resource rights of indigenous women. We recommend modifying the text to emphasize that "equitable governance" cannot be achieved without structural, legally recognized protections for women's customary and collective actions within traditional territories, rather than treating them merely as passive consultation participants.

**Comment 28 | II.B - Implementation of global targets · p.238 l.0
→ p.244 l.0 · [figure]**

The section on Target 23 highlights the importance of gender equality in biodiversity action. However, the report does not include any figures or visualizations that illustrate the gender gap in participation, access to resources, or leadership in biodiversity governance.

We recommend that the final report include a figure (e.g., a bar chart or infographic) showing the percentage of women in decision-making bodies related to biodiversity, representation in NBSAP processes, or access to biodiversity finance. Visualizing these data would make the challenges more tangible and compelling for policymakers.

Comment 29 | II.B - Implementation of global targets · p.238 l.0
→ p.238 l.0 · *[text]*

The progress overview correctly notes that implementation of gender-responsive biodiversity governance remains at an early stage. To move forward substantively, the report should recommend that national monitoring frameworks operationalize binary indicators to track gender-disaggregated financial flows. Funding allocated via domestic NBSAPs must be explicitly traceable to grassroots women-led environmental initiatives and indigenous women's networks to ensure real accountability.

Comment 30 | II.B - Implementation of global targets · p.238 → p.244 · *[general]*

Case Studies and Target 23. Examples of good practices by both Parties and NSA are highlighted as illustrations of good implementation and they can be very inspiring in showing that it is possible to move forward and fill the gaps. They are regionally and country representative however other criteria for selecting specific case studies are unclear. Moreover, the quality of some case studies falls short. The suggestion would be to clarify all criteria for selection, add more case studies for each target, shorter highlights but more. For example, for Target 23 draw also on the Parties' submissions on GPA, which represent strong examples of implementation of GPA and Target 23 at national level.

Comment 31 | II.B - Implementation of global targets · p.240 l.1
→ p.240 l.10 · *[text]*

In the section on Target 23, the binary indicator results show that only 49 per cent of Parties scored high on progress, while many remain in early stages. The report should recommend that future reporting include a specific qualitative question on the barriers women face in participating in biodiversity governance, such as cultural norms, lack of access to education, and limited financial resources. Understanding these barriers is essential for designing effective interventions.

**Comment 32 | II.B - Implementation of global targets · p.243 l.2
→ p.243 l.13 · [text]**

The report on Target 23 notes that "formal participation of women does not translate into substantive decision-making authority." This is a critical insight, but the report does not provide concrete recommendations on how to address this challenge. We suggest adding a recommendation that Parties adopt specific measures such as quotas, capacity-building programs, and mentorship initiatives to ensure that women's participation translates into genuine influence over decisions affecting biodiversity.

**Comment 33 | II.B - Implementation of global targets · p.243 l.3
→ p.243 l.14 · [general]**

Target 23 and GPA. In the section on challenges, reference to the findings and lessons learned from the Gender Plan of Action mid-term review (which are connected) would help create the necessary synergy between Target 23 and the Global Review with the GPA and its mid-term review. In order to fill the gap in implementation and ambition of Target 23, drawing the two processes closer together can show best practices and advance the gender-responsive implementation of the GBF.

II.D - Means of implementation

Comment 16 | II.D - Means of implementation · p.50 l.26 → p.50 l.30 · [general]

P.50 lists indigenous peoples and local communities, youth, and 'the broader public' as the groups whose depth of NBSAP engagement lags behind NGOs and ministries. No reference for women.

Comment 34 | II.D - Means of implementation · p.278 l.35 → p.279 l.1 · [text]

The report notes that finance does not consistently reach sub-national governments, indigenous peoples and local communities, or the actors directly responsible for managing protected areas. We recommend adding an explicit observation that women-led organizations and women's groups are often excluded from these financial flows due to lack of formal land titles, limited access to banking, and gender-based discrimination. The report should call for targeted measures to ensure that financial resources reach women as key actors in biodiversity conservation and sustainable use.

Comment 35 | II.D - Means of implementation · p.283 l.1 → p.283 l.10 · [text]

The report notes that citizen science platforms and open biodiversity data systems are increasingly providing complementary monitoring support. We recommend adding a specific observation that women's participation in citizen science is often lower than men's due to time constraints, safety concerns, and lack of access to technology. The report should call for gender-responsive approaches to citizen science that remove these barriers and actively engage women as knowledge holders and contributors.

Comment 36 | II.D - Means of implementation · p.287 l.27 → p.287 l.31 · [text]

The report notes that capacity-building for women in biodiversity governance is reported through a mix of approaches, including training dedicated gender focal points. We recommend adding an observation that these capacity-building efforts must go beyond training to include structural changes such as legal reforms, institutional support, and accessible financing mechanisms that enable women to translate their knowledge into action. Without these enabling conditions, capacity-building alone will not be sufficient to close the gender gap in biodiversity governance.

Comment 37 | II.D - Means of implementation · p.287 l.0 → p.287 l.0 · [general]

Page 287 (lines 10-12) acknowledges that "persons with disabilities and environmental defenders, both explicitly named in Target 22, are mentioned in a much smaller number of actions than the other groups, and reporting on them is largely absent." This finding is presented without any gender lens, despite extensive documentation. We recommend this paragraph explicitly flag the absence of gender-disaggregated reporting on support reaching environmental human rights defenders, and that future reporting guidance ask Parties to report whether financial and technical support for defenders reaches women defenders specifically.

Comment 38 | II.D - Means of implementation · p.289 l.1 → p.289 l.8 · [text]

The report notes that technology transfer to indigenous peoples and local communities is "stronger in principles than in practice," particularly regarding respect for rights and traditional knowledge.

We recommend adding a specific observation that women's traditional knowledge is often undervalued and excluded from technology transfer initiatives, even though women hold critical knowledge about seeds, medicinal plants, and sustainable resource management. The report should call for technology transfer processes that explicitly recognize and integrate women's traditional knowledge.

II.E - MEAs and international organizations

Comment 39 | II.E - MEAs and international organizations · p.292 l.0 → p.298 l.0 · *[general]*

This section on MEAs and international organizations should include references to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the role of UN Women in supporting gender-responsive implementation of the Framework. The Gender Plan of Action specifically calls for coordination with these bodies, and their inclusion in this section would strengthen the report's recognition of the interconnected frameworks that support gender equality in biodiversity governance.

Comment 40 | II.E - MEAs and international organizations · p.292 l.0 → p.298 l.0 · *[general]*

This section runs through synergies with Ramsar, CMS, IWC, World Heritage, BBNJ, UNESCO MAB, UNDRR, ISO – not one mention of UN Women, CEDAW, or the gender action plans and the gender constituencies of the other Rio Conventions. The Gender Plan of Action (Objective 3.4) specifically calls for coordination with UN and international gender partners and the Rio Conventions on this.

III.A - Synthesis of collective progress

Comment 41 | III.A - Synthesis of collective progress · p.314 l.54 → p.314 l.58 · *[general]*

The table on "Data and information gaps persist" mentions limited disaggregated data but does not specifically highlight the absence of gender-disaggregated data as a critical gap.

Given that the Gender Plan of Action calls for gender-responsive monitoring and reporting, this omission is significant. We recommend that the table include a specific bullet point on the need for gender-disaggregated data to track progress toward Target 23 and to ensure that women and girls benefit equitably from biodiversity actions.

III.B - Moving forward

Comment 42 | III.B - Moving forward · p.315 l.16 → p.318 l.27 · [general]

The key messages on "Means of implementation" do not explicitly address the need for gender-responsive budgeting and financing. We recommend adding a paragraph under Key message A.3 that calls on Parties to adopt gender-responsive budgeting in their biodiversity finance plans, ensuring that funding reaches women-led initiatives and grassroots organizations. The report should also recommend that gender-disaggregated financial data be reported as part of national monitoring frameworks to enable tracking of resource flows to women and girls.

Comment 43 | III.B - Moving forward · p.315 l.2 → p.315 l.5 · [text]

Addressing the gaps in collective progress will require addressing the underlying reasons for the gaps, including those related to ambition, implementation action, means of implementation, environmental governance and policy coherence, whole-of-society engagement, and data and knowledge, with particular attention to gender-responsive approaches and the meaningful participation of indigenous peoples and local communities, women, youth and other rightsholders in generating and using biodiversity-related data.

Comment 44 | III.B - Moving forward · p.315 l.0 → p.315 l.0 · [general]

In the synthesis of collective actions to bridge resource mobilization gaps (Target 19), there is a critical need to include gender-responsive budgeting as a core mechanism. The report should explicitly highlight that environmental governance and "whole-of-society" funding allocations fail when structural barriers, such as women's lack of secure land titles or limited access to technology, prevent direct financial resource access for the very actors sustaining agroecological systems on the ground.

Comment 45 | III.B - Moving forward · p.320 l.220 → p.322 l.278 ·
[text]

Key message A.5 emphasizes the importance of a whole-of-society approach but does not specifically mention the role of women's organizations and networks. We recommend adding a sentence recognizing the unique contributions of women's groups and networks in implementing the Framework and calling for their meaningful engagement in decision-making, implementation, and monitoring at all levels.

Comment 46 | III.B - Moving forward · p.321 l.229 → p.321 l.233 ·
[text]

While many national biodiversity strategies and action plans, national targets and national reports acknowledge the role of different actors, and 180 commitments have been submitted by actors other than national governments, these efforts remain limited in scale and visibility, and the evidence they generate is rarely integrated into national monitoring and reporting systems.

Comment 47 | III.B - Moving forward · p.322 l.279 → p.324 l.347 ·
[general]

Key message A.6 on "Data and information gaps" should explicitly call for the collection and use of gender-disaggregated data in national monitoring and reporting. Without this data, it is impossible to assess whether biodiversity policies are benefiting women and girls equitably or to identify barriers that limit their participation and access to resources. We recommend adding a specific recommendation that Parties prioritize the collection of sex-disaggregated data and report on gender-specific indicators in their national reports.

Comment 48 | III.B - Moving forward · p.323 l.318 → p.323 l.329 ·
[text]

The use of disaggregated data, for example by ecosystem type, gender, or for indigenous peoples and local communities, also remains limited, which makes it difficult to understand who benefits from, or bears the costs of, biodiversity-related policies and actions, especially for women, youth and indigenous peoples and local communities.



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