

Background Paper

Conclusions from the analysis of the first National Reports on the Implementation of the Protocol on Conservation and Sustainable Use of Biological and Landscape Diversity (Bucharest, 2008) to the Carpathian Convention

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Executive Summary

Pursuant to Article 28 of the Protocol on Conservation and Sustainable Use of Biological and Landscape Diversity (Bucharest, 2008) to the Carpathian Convention, the Parties shall regularly report on measures related to the Protocol and the results of the measures taken. The timeframe for reporting was set at COP3 while the reporting format was agreed upon at COP4, and has significantly been modified in late 2016.

However, not all Parties submitted their National Reports in time for the Fifth Meeting of the Conference of the Parties (COP5) in 2017. Therefore, the summary of National Reports submitted by all Parties, requested by the Implementation Committee (CCIC), was not feasible. Hence, the Secretariat (SCC) decided to review the few available National Reports, analyse the appropriateness of the methodology implemented in the reporting format (which could have been one of the reasons for delay in reporting), and present resulting conclusions and recommendations to the CCIC.

Findings of this paper indicate, that none of the two reporting formats developed so far are suitable for efficient reporting on the progress in implementation of the Protocol. Furthermore, the shortcomings of the currently used ‘simplified’ reporting format, proposed for adoption at COP5, can significantly impede evaluation of the progress at either national or eco-regional (pan-Carpathian) scale, which was the original intention behind the reporting concept.

Findings and conclusions of this paper, analyzing lessons learned during the first ever round of reporting on the implementation of the aforementioned Protocol, could facilitate the development of reporting formats under other Protocols to the Framework Convention (e.g. on Sustainable Forest Management, and on Sustainable Tourism, each containing provisions on regular reporting duty), or the development of a template for the comprehensive National Report on Implementation of the Carpathian Convention covering all the Protocols and other relevant sectors, currently proposed for consideration at COP5 [draft Decision COP5/1.2].

1. Introduction

The Carpathian Convention Implementation Committee (hereinafter referred to as “the CCIC”) at its eighth meeting in Modrá (Czech Republic) on 14 – 16 June 2017, requested the Secretariat to prepare a summary of National Reports on the Implementation of the Protocol on Conservation and Sustainable Use of Biological and Landscape Diversity to the Carpathian Convention, by the date of the Fifth Meeting of the Conference of the Parties (COP5), to be held in Lillafüred (Hungary) on 10 – 12 October 2017.

According to the decision of the CCIC, the deadline for submitting the National Reports was 30 June 2017 (approx. three months prior to the COP5 meeting). However, only four out of seven due National Reports have been provided to the Secretariat until 10 September 2017 (one month prior to the COP5 meeting, considered the ‘information cut-off date’ for this background paper).

Due to the above, the preparation of a summary of National Reports submitted by all Parties has not been possible so far. However, the Secretariat decided to analyze the contents of the received ones, and present the resulting conclusions and recommendations to the CCIC.

2. Background information

2.1. Legal basis for reporting on the implementation of the Protocol

The Protocol on Conservation and Sustainable Use of Biological and Landscape Diversity (hereinafter referred to as “the Protocol”) to the Framework Convention on the Protection and Sustainable Development of the Carpathians (hereinafter referred to as “the Convention”) was adopted by the Conference of the Parties to the Convention at its second meeting (COP2) in Bucharest on 19th June 2008 [Decision COP2/1.3], as the first thematic protocol to the Convention. The Protocol entered into force in April 2010, and is currently in force for all Parties to the Convention since July 2013.

Pursuant to Article 28 of the Protocol, the Parties shall regularly report to the Conference of the Parties on measures related to the Protocol and the results of the measures taken. Information on the implementation of the Protocol shall be collected, assessed and analysed by the Carpathian Convention Implementation Committee (hereinafter referred to as “the Implementation Committee”). The Implementation Committee shall submit resulting recommendations for implementation of the Protocol, and measures for compliance with the Protocol, to the Conference of the Parties, which shall adopt or recommend necessary measures.

2.2. Timeframe for reporting on the implementation of the Protocol

The timeframe (intervals) for reporting was set by the Conference of the Parties at COP3 in 2011, during the Meeting of the Parties to the Protocol, by adopting the common Strategic Action Plan (hereinafter referred to as “the SAP”) for the implementation of the Protocol [Decision COP3/1.1]. According to SAP Action 11.3. the Parties shall submit a three years report on activities aimed at implementing the Protocol and their effectiveness to the Secretariat three months prior to each ordinary meeting of the Conference of the Parties. The first ever National Reports were to be submitted by 30 June 2017.

2.3. Format for reporting on the implementation of the Protocol

In September 2014 the Conference of the Parties adopted the format for the National Report on the Implementation of the Protocol [Decision COP4/1.1], developed under the BioREGIO-Carpathians project, then consulted with, and modified accordingly to the comments by the Carpathian Convention Working Group on Conservation and Sustainable Use of Biological and Landscape Diversity (hereinafter referred to as “WG Biodiversity”).

However, the format for reporting on the progress in implementation of the Protocol evolved since COP4, prior to the submission of the first national reports by the Parties.

In October 2016 WG Biodiversity informed the Secretariat that filling in the format adopted at COP4 is too complicated for the Parties, due to its complexity and specificity. Hence, a second simplified version has been elaborated in consultation with WG Biodiversity, and approved in November 2016 by the Implementation Committee. This second version has been used by the Parties for developing their National Reports, and is currently proposed for adoption by the Conference of the Parties at its 5th meeting (COP5 in Lillafüred, Hungary) [draft Decision COP5/4.2].

2.4. Similarities between the two versions of the National Report format

Both reporting formats contain the cover page, followed by a short (one page) section “Introduction & background”, a section informing on the Institution reporting on behalf of the Party (“Institutional Information – Reporting Party”), and then the main body of the actual report, divided into two parts: “A” (“General information of national implementation progress”) and “B” (Achievements and further implementation information). In both reporting formats part A contains the same three questions, requiring descriptive answers. Part B of both reporting formats contains eight questions, seven of which are exactly the same. Six out of these seven questions require descriptive answers, while one is structured as a checklist, with given answers and fields meant for indicating (by ticking box) the applicability of respective answers, plus another field for additional comments.

2.5. Differences between the two versions of the National Report format

The only differences between the two versions of the reporting format are present:

- on the cover page;
- in the first question of part B (numbered as B.1).

As for the first difference, the cover page of the format adopted by the Conference of the Parties in 2014, apart from the logo of the Convention, is also bearing three additional logos: one of the BioREGIO-Carpathians project, and two logos acknowledging the co-funding sources for the above project (the logo of the South East Europe - Transnational Cooperation Programme, and of the European Union), while the cover page of the ‘simplified’ reporting format approved in November 2016 by the Implementation Committee is solely bearing the logo of the Convention. The latter one (of November 2016) seems to be more proper for a National Report by the Parties to the Convention, some of which are not yet the Member States of the European Union. Furthermore, national reports submitted e.g. in 2017 and subsequent years should not bear a logo of a project completed already in 2013.

The second difference between the two versions of the reporting format, which is a different methodology applied in Question B.1, must have had a considerable effect on the reporting process, and its outcomes.

2.6. Methodologies applied in Question B.1 of the two reporting formats

Question B.1 in the format adopted by the Conference of the Parties in 2014 referred both to the Protocol (and its particular Articles) and the SAP (and its particular objectives, actions, and expected results). Basically, the original Question B.1 aimed to evaluate the progress in implementation of the Protocol by measuring the achievement of numerous ‘results expected’ of the SAP (each quoted in the first column) under particular SAP Objectives. Due to the above, Question B.1 constituted the most extensive part (approx. 90 per cent) of the questionnaire, and required the evaluation of achievement of as many as 72 ‘results expected’, corresponding to the vast majority (13 out of 15) of SAP Objectives (the questionnaire does not concern four ‘results expected’, listed under SAP Objective 12 - Prevention of environmental damages, and Objective 14 - Consideration of traditional knowledge and practices). This is probably why the original reporting format, adopted at COP4 might have seemed too complex and specific.

However, responding to all these 72 detailed questions under Question B.1 required only marking relevant boxes (by inserting letter “X) in the appropriate column of the questionnaire, corresponding to achievement status description (qualitative indicator), including “Comprehensive measures taken (fully achieved)”, “Some measures taken (partially achieved)”, “Not achieved” or “No information”. Additionally, the format contained an empty box for “Possible comments and details”, where a reporting Party could optionally (but was not required to) add its descriptive comments, if perceived necessary.

Contrary to the above, Question B.1 in the new ‘simplified’ reporting format (approved in November 2016 by the Implementation Committee) explicitly requires descriptive answers concerning “measures to implement the Protocol and the results of the measures taken”, under very general headings corresponding to selected 12 (out of 15) SAP Objectives, with no further references to SAP contents.

Hence, when reporting on the progress in implementation of the Protocol, the Parties are currently no longer required to evaluate, and report on the achievement of ‘results expected’ of the common Strategic Action Plan for the implementation of the Protocol, adopted at COP3, with the intention to provide detailed guidance on the commonly agreed most urgent priorities in Protocol implementation.

3. General comments

3.1. Consequences of the methodological change in Question B.1 of the reporting format

The above described methodological change in Question B.1 of the reporting format had the effect on both the reporting and future assessment process.

Due to the above change, when answering Question B.1 in the ‘simplified’ reporting format, instead of marking 72 boxes, the Parties are currently required to provide 12 descriptive answers, which might have been perceived as a desired significant simplification of the reporting process.

However, the ‘simplified’ format does not provide any further guidance on which priority issues should these answers focus (like detailed SAP ‘results expected’ quoted in the previous format). In result, these descriptive answers to twelve ‘open questions’ (followed by the instruction “*Please provide your inputs*”) under Question B.1 in reports provided by the Parties are very different in length and substantive scope, and not structured, much less provided in a similar, or at least compatible manner.

Due to the fact that the provisions of the Protocol are often similar to those of other legal and policy instruments, e.g. other relevant international conventions (please see explanation under section 4.2), institutions responsible for compiling National Reports are tempted to provide answers to Question B.1 by utilizing (“copy and paste”) the contents of other, previously submitted national reports on the implementation of other Conventions, or to provide a link to other national reports (e.g. to the 1992 Convention on Biological Diversity), instead of answering in the report questionnaire. In result, in some cases the information provided is not relevant (e.g. concerning activities implemented well beyond the geographic scope of the implementation of the Convention and its Protocol). Last, but not least, the above practice leads to a great number of repetitions in the text.

In few cases responses under Question B.1 contain only references to implemented project acronyms (with no further explanations on which particular project activities and achievements are referred to), while in another case, instead of providing an answer in the questionnaire, the National Report provides a link to the extensive publication (148 pages long), studying which allows to find comprehensive descriptions of 30 projects, out of which only one has been implemented in the Carpathian region. Similarly, providing links to websites would not facilitate the work of the possible future reviewers.

Moreover, due to the methodological change in Question B.1, the four reports already submitted by the Parties considerably vary in length, as the number of pages containing responses to the questionnaire (excluding the cover and two introductory pages) varies between 7 and 47.

Furthermore, an evaluation of the progress in the implementation of the Protocol achieved at the national or eco-regional scale, on the basis of reports using the ‘simplified’ format might seriously be impeded by the absence of any commonly agreed and used progress indicators (regardless whether quantitative or qualitative), either those resulting from the SAP, or any other indicators that might still be developed and proposed by the WG Biodiversity, or the CCIC

Hence, any future attempt to analyse, compare, consolidate and summarize National Reports submitted by the Parties, especially if developed with the use of the recently ‘simplified’ reporting format, might be quite challenging, to say the least.

3.2. Shortcomings of the reporting format (present in both versions)

3.2.1. The first sentence of the section “Introduction & background” on page 2 of the reporting format contains incorrect information on the year of the adoption of the Protocol (“*done in Bucharest on 19 June 2009*”).

3.2.2. The first sentence of Question A.1 (“*Which are the legal, policy and institutional achievements on national and regional levels since the adoption of the Protocol in your country, aiming at its implementation and the realisation of its objectives?*”) corresponds to SAP Action 1.1, resulting from Article 4 of the Protocol, assuming the development, implementation and harmonisation of national policies and strategies related to the conservation, restoration and sustainable use of biological and landscape diversity of the Carpathians. The original intention of this question was to assess the effect of the Protocol implementation on the national legal, policy and institutional frameworks.

However, the current formulation of this question might be misleading. In result, some Parties that successfully submitted their National Reports, provide extensive descriptions of other policies and strategies implemented at the national scale (e.g. their national or EU legislation), not necessarily resulting from the implementation of the Protocol, or list institutions and agencies involved in nature conservation activities in the whole country.

Such brief overview of the existing legal and institutional background for implementation of the Protocol is indeed a valuable information, but does not inform on the progress in the implementation of Article 4 of the Protocol (“*Each Party shall develop and implement policies and strategies in its national territory*”).

aiming at the conservation, restoration and sustainable use of biological and landscape diversity of the Carpathians while taking into consideration policies and strategies developed and implemented by other Parties.”).

3.2.3. The second sentence of Question A.1 (“*Please give a short summary of all relevant measures, laws, projects, programs, initiatives, multilateral agreements, etc.*”) is misleading, and can be interpreted by the Parties in several different ways.

The first and most obvious interpretation would be that this second question is supplementing the first one, concerning the influence of the Protocol on the legal, policy and institutional frameworks in particular Parties. However, in such case information on “*projects, programs, initiatives, multilateral agreements*” would not be relevant.

Another possible interpretation could be that responding to this part of Question A.1 does require providing short summaries of all “*measures, laws, projects, programs, initiatives, multilateral agreements*” relevant to the implementation of the Protocol. However, in such case, the remaining part of the report questionnaire would then become redundant and useless.

3.2.4. The last sentence of Question A.1 requires the Parties to provide “*a narrative description of the main features (geography, biological and landscape diversity) of the Carpathian region of your national territory*”.

First of all, it is not clear why such requirement has been included under the question on the legal, policy and institutional frameworks. Secondly, even though such descriptions provided by all Parties could largely facilitate compiling a general description of the Carpathian eco-region, it should not become a requirement included in the reporting template. **Last, but not least, such narrative descriptions should probably not be required in each reporting round, each third year.**

3.2.5. It is also not clear, why the three above quoted sentences (not particularly linked to, or resulting from each other) jointly constitute one question, collectively numbered as “**A.1**”, while no other next questions (A.2, A.3 etc.) follow in part A of the report questionnaire.

3.2.6. **Question B.6** concerning the contribution of the local authorities and other stakeholders (e.g. NGOs, private sector) to the implementation of the Protocol lists several fields of their possible activities (“*degraded habitats, endangered species, water and river basins management, industry and energy, spatial planning, tourism, protected areas, communication, research, cooperation, information*”) structured in quite a chaotic manner, to say the least.

It should also be emphasized, that the Protocol on the protection and sustainable use of biological diversity and landscape to the Carpathian Framework Convention does not contain any provisions directly addressing sustainable and integrated river basin management (Article 6 of the Convention), industry and energy (Article 10), spatial planning (Article 5) or tourism (Article 9, supported by a separate Protocol on Sustainable Tourism to the Framework Convention). This is probably the reason why some Parties avoided answering to this particular question.

In view of the above, the questionnaire concerning the implementation of the Protocol should not include questions related to activities in areas not covered by this Protocol, not justified by its substantive scope. Furthermore, such could be quite misleading, in particular for local authorities and other stakeholders, often not enough familiar with the Convention approach, logic, internal structure and resulting legislation.

4. Specific remarks based on the analysis of available National Reports

As some National Reports are still pending, no summary report on the progress in the implementation of the Protocol at the eco-regional pan-Carpathian scale can be prepared. However, basing on the analysis of the four already available National Reports, the following should be noted:

4.1. Development and implementation of policies and strategies focused on the Carpathians

Pursuant to Article 4 of the Protocol (which explicitly requires each Party to develop and implement its national policies and strategies aiming at the conservation, restoration and sustainable use of biological and landscape diversity of the Carpathians) at least one Party is currently developing its National Action Plan for the implementation of the Protocol, already consulted with the local authorities within the geographic scope of Convention application. Another Party adopted (already in 2007, thus prior to adoption of the Protocol at COP2) the Strategy for the implementation of the Convention, accompanied by an Action Plan, which includes actions aimed at the implementation of the Protocol. Furthermore, the Protocol is implemented through the incorporation of its provisions by relevant programmes and action plans adopted at the regional (NUTS 2) level.

4.2. The effect of the Protocol on the implementation of specific measures

It should be noted, that some specific measures prescribed by the Protocol cannot be implemented until the Carpathian Red List of Habitats (Article 8.1 of the Protocol) and the Carpathian Red List of Species (Article 12.1) are adopted by the Conference of the Parties.

Despite the above, all Parties which delivered their National Reports, have implemented an impressive multitude of measures aimed e.g. at the conservation, maintenance, restoration and sustainable use of natural and semi-natural habitats (corresponding to Article 8 of the Protocol), and the conservation and sustainable use of species of flora and fauna (corresponding to Article 11 of the Protocol).

However, according to these National Reports, all above measures are implemented under other legal and policy instruments than the Carpathian Convention and its Protocol, e.g. other international conventions (in particular the Convention on Biological Diversity), EU policies and strategic documents (incl. the EU Biodiversity Strategy, and the Common Agricultural Policy), and various national policies, strategies, programmes and action plans currently in force, implemented at the scale of the whole country (thus, with no particular focus on the Carpathians).

It should be emphasized that the Convention and its Protocol must not be perceived as “competitors” to other legal acts, in particular not to the other international agreements to which all Carpathian States are Parties, explicitly mentioned in the preamble to the Protocol, e.g. the Convention on Biological Diversity (Rio de Janeiro, 1992), the Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 1979), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (Washington, 1973), the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (Ramsar, 1971), the Convention on Conservation of Migratory Species of Wild Animals (Bonn, 1979), and the European Landscape Convention (Florence, 2000).

According to the preamble, the aim of adopting the Protocol was to ensure “*a more effective implementation of existing legal instruments*”. The same approach is present in the Convention, mentioning “*relevant global, regional and sub-regional environmental legal instruments, strategies and programmes*”.

Hence, the original intention behind adopting the Carpathian Convention and its Protocol was also to ensure a more effective implementation of other Conventions, listed in the preamble. But, with a special focus on the Carpathian region, which is not yet the case in those Parties, **which have not yet developed their “Carpathian-focused” national policies and strategies resulting from the Protocol** (see previous section 4.1.). It should be noted here that, from the purely legal point of view, the Carpathian Convention is no less binding the Parties than all above mentioned other Conventions. The same relates to the binding force of the Protocol, being part of the international legislation under the Carpathian Convention.

Nevertheless, the above justifies the statement, that the Carpathian Convention and its Protocol (although in force in all Parties for several years) had so far limited effect on positioning the Carpathians higher on the list of national biodiversity conservation priorities of the Parties.

4.3. Involvement of local authorities and stakeholders in the implementation of the Protocol

As emphasized by one of the Parties in the National Report: “*without active participation of local governments, it is not possible to fully achieve the assumed objectives of Protocol implementation, e.g. effective protection and preservation of landscape diversity (Art. 1 of the Protocol), ensuring ecological connectivity (Art. 9 of the Protocol) and, first of all, strengthening the protection and sustainable management in areas located beyond the protected areas (Art. 15 of the Protocol)*”, and that the inhabitants of the Carpathian region should be “*the main beneficiaries of the implementation of the Convention provisions and protocols thereto*”. Therefore, it is proposed, that “***the Carpathian local self-government units should be included in the implementation of the Protocol on similar terms as bodies, organisational units and institutions belonging to government administration***”.

4.4. Best practice examples

The analysis of the four already available National Reports allowed to identify numerous best practice examples, including:

- transboundary cooperation on the identification of migration routes of large carnivores, and adoption of regional programmes for the protection of transboundary ecological corridors (in line with Articles 12, 15 and 16 of the Protocol, SAP Actions 4.1 and 8.1)
- establishment of breeding / conservation centers for the European bison, Hutsul horse, and brown bear (Articles 11 and 12.2 of the Protocol, SAP Action 3.2 g)
- development and adoption (in some cases - prior to the adoption of the Protocol) of ‘regional red lists’ of vascular plant species, animal species, and habitats, subject to special protection at the regional scale (Articles 8, 11 and 12 of the Protocol, SAP Actions 2.1 and 3.1)
- development and adoption of regional lists of invasive alien species (Article 13 of the Protocol, SAP Action 5.2)
- transboundary cooperation between neighbouring protected areas (Article 16 of the Protocol, SAP Action 8.1)
- elaboration, adoption (in some cases - prior to the adoption of the Protocol), and implementation of regional (province level) and local (district level) programs on the development and extension of the ecological network (Article 9 of the Protocol, SAP Action 4.1), incl. recommendations for the implementation of priority measures for the restoration of habitats and ecosystems (Article 10 of the Protocol, SAP Action 2.3)
- preparatory works and consultations on the possible extension of existing protected areas (Article 9.2 of the Protocol, SAP Action 4.1) and establishment of new transboundary protected areas (Article 16.2 of the Protocol, SAP Action 8.5)
- establishment of a special internet portal on the Carpathian Convention (tailored for, and targeted at three different audiences: experts and scientists, local governments and communities, tourists and general public) facilitating information exchange and public consultations (Articles 6 and 24 of the Protocol, SAP Action 15.2)
- organization of regular annual ‘round tables’ for local stakeholders from the Carpathian region, facilitating the exchange of information on recent developments, projects and activities (Articles 6 and 24 of the Protocol, SAP Action 15.2)
- organization of a series of regional conferences aimed at the involvement of local authorities, the “Carpathian Open University”, and trainings, aimed at building capacity of local stakeholders for the implementation of the Protocol (Articles 6 and 24 of the Protocol, SAP Action 15.2)
- assigning priority “advantage points” during the project application evaluation process for funding under the Operational Programme Environment to biodiversity-related projects to be implemented within the geographic scope of Convention (Article 21.2 of the Protocol)
- establishment of special collective bodies (e.g. the Inter-ministerial Coordination Group, National Steering Committee), involving representatives of ministries responsible for different sectoral policies, regional authorities, scientific and research institutions, and other stakeholders (e.g. local authorities, NGOs), in order to ensure and monitor the implementation of the Convention and its Protocols (Articles 6, 21 and 24 of the Protocol).

5. Conclusions

According to the findings of this paper - none of the two reporting formats developed so far are suitable for efficient reporting on the progress in implementation of the Protocol.

According to Article 29 of the Protocol, the Parties shall regularly examine and evaluate the effectiveness of the provisions of the Protocol. Hence, national reports on the implementation of the Protocol in respective Parties shall not only inform the Implementation Committee and the Conference of the Parties, but also serve for internal (in-country) evaluation of performance and achievements made by particular Parties, and adjusting their strategies accordingly.

However, the shortcomings of the currently used ‘simplified’ reporting format (proposed for adoption at COP5) can significantly impede the evaluation of the progress at national and eco-regional pan-Carpathian scale, which was the original intention behind the reporting concept.

6. Recommendations on possible next steps

It is strongly recommended, that the WG Biodiversity either elaborates a new format for reporting on the progress in the implementation of the Protocol, or contributes to the development of the integrated comprehensive National Report on Implementation of the Carpathian Convention, covering all Protocols and other relevant sectors, taking into account the guidelines provided below:

- the National Reports should first and foremost focus on activities and achievements resulting from the implementation of the Carpathian Convention and its Protocol, in particular those implemented and achieved in cooperation with other Parties, which would then prove the real added value of implementing the Convention and its Protocol
- the National Reports should provide an opportunity to monitor the implementation of the Protocol with the use of Protocol-specific progress indicators (quantitative and/or qualitative) instead of extensive descriptions, in particular if such could overlap with publicly available national reports to other relevant Conventions (e.g. the CBD)
- the timing for National Reports submission should possibly be harmonized with the timeframe for planning the subsequent EU Multiannual Financial Frameworks

Last, but not least, the National Reports (or their summaries, both at the national and pan-Carpathian scale) should probably be made available not only to the CCIC, but also to the public, pursuant to Article 24.2 of the Protocol (*“The Parties shall ensure access of the public to the information related to the implementation of this Protocol.”*).

General remarks Parties:

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If we were to evaluate the implementation of the Protocol by listing the actions taken and objectives achieved as assigned by the Strategic Action Plan, the results would be rather unsatisfactory. Although we believe that important and successful steps were taken in order to implement the Biodiversity Protocol (in the case of the Czech Republic mostly through international cooperation), they implement only a small part of the SAP. We however see this rather as a drawback of the SAP itself. It proves to be too ambitious and not quite strategic (actions and objectives should be planned for example as “SMART”: specific, measurable, assignable, realistic and time-related).

Thus, for future implementation of the Protocol, we would propose to use the SAP only as a list of possible actions. On the national level, Parties should focus on those actions they believe to be the most relevant for their specific situation. On the international level, we would suggest that the implementation is planned in a more strategic manner, if possible including indicators that would also allow (qualitative) evaluation. In our opinion, Parties should jointly decide (through CCIC/COP) on several specific priorities they consider the most important and relevant for each upcoming implementation period while also taking into account current situation and developments at other international fora. Based on these priorities as well as on both financial and personnel capacities, topics and tasks for the WG for the next implementation period could be determined and at the end of each period the qualitative evaluation of results achieved could be carried out.