Comments on the Paper

MAINSTREAMING BIODIVERSITY CONSERVATION INTO TRADE IN ASEAN
How to turn the tide? Case study on the countries of Indonesia, the Philippines, and Viet Nam

Ekoningtyas Margu Wardani
Independent Expert, Indonesia
This comprehensive paper provides many details on biotrade-related matters, a pertinent topic in mainstreaming biodiversity.

This is relevant not only to the participating organizations (ACB, UNCTAD, and Helvetas), but also in a wider context, particularly for the targeted audiences, such as AMS focal points, government officials, and other relevant stakeholders.

Some arguments need supporting data, i.e. economic growth, biodiversity hotspots, deforestation, fishing, etc. For example, the author referenced the macroeconomic data from the World Bank (page 5). It would be helpful if the readers could relate directly to the numbers of ASEAN macroeconomic data rather than looking for the link in other sources. The same applies to other references to the data.
General Comments

- I personally like the data presentation and explanation of biotrade related matters (share, export) in three countries (page 17-20). But, if it is still possible, might the data on the growth of biotrade shares be worth considering to strengthen and enrich the arguments?

- Some important commodities that contribute significantly to ASEAN economies are mostly mono-crops (page 6, 19). For some countries, it can be a bit sensitive. For consideration, the paper can also provide some examples from non-mono-crop commodities. Many initiatives have been done in the ASEAN region to promote more sustainable and less controversial commodities. In fact, ACB also has comprehensive programs to promote biodiversity conservation efforts, but at the same time to improve the livelihoods of the people.

- The author provided examples of some ASEAN programs on biotrade related matters (page 54). Specifically, for ACB programs, it might be relevant also to mention the Small Grants Programme (SGP) funded by the KfW.
Specific Comments

- I would like to hear more from the author on the data described on page 16, especially about deforestation on the tree cover loss for three countries of Indonesia, the Philippines, and Viet Nam (Figure 5). In addition, further elaboration is also needed for the connection between deforestation, biotrade, and biodiversity conservation (page 16).

- I suggest deleting point (d) on page 20 since this section doesn’t say much to add some points to the report.

- The author refers to important and reliable sources for the data and information, such as IPBES, World Bank, FAO, etc. However, it would be nice also if the author could provide some references from the countries’ official data. For example, the statement on page 10: “Indonesia has been known in the past for its high deforestation rate due to agriculture expansion, especially palm oil, as became globally famous through a campaign by Greenpeace in 2010.”

- It would be helpful if the author added a reference from the official data from the government to support this argument. MoEF Indonesia has a time series of data on deforestation.
Further studies need to be considered to represent more robust findings at the regional level. One of the key findings mentioned about Cambodia is one of the highest shares of biotrade in ASEAN. Not to mention Lao PDR, Myanmar, and Thailand are also important AMS in the biotrade.

In addition, having a national consultant in each AMS could be considered to resolve language barriers and data constraints (mostly in national languages).

Depending on the target audience, the paper can be shortened, focusing only on biodiversity and biotrade related matters. The other supporting topics can be placed in the annexes. But if time is the constraint because this is already the dissemination stage, producing a policy brief can be an alternative to sharing this valuable piece with the targeted audiences.

Aside from sharing the paper with wider audiences, it might be a good consideration also to publish the paper in an academic journal.