

Survey for the Virtual Consultation on the Sustainable Use of Biological Diversity

This [survey](#) is part of the Virtual Consultation on the Sustainable Use of Biological Diversity for the Post-2020 Global Biodiversity Framework. The consultation consists of a series of webinars, the current survey and an online forum. These activities are planned to ensure that further views on elements related to the sustainable use of biodiversity for the post-2020 global biodiversity framework are elicited in-depth.

Instructions

This online survey will consist of 3 sections. The first section focuses on overall inclusion of the sustainable use of biological diversity aspects in the draft post-2020 global biodiversity framework. The second section focuses on the draft targets. The third section focuses on customary sustainable use.

In order to complete this survey, you may wish to reference the draft monitoring framework for the post-2020 global biodiversity framework issued for review, found at the following link: <https://www.cbd.int/sbstta/sbstta-24/post2020-monitoring-en.pdf>.

This online survey will be available from 27 July - 18 August 2020.

In order to provide better assistance to the Co-Leads of the consultation and to the Co-Chairs of the Open-ended Working Group on the Post-2020 Global Biodiversity Framework, we request that only one (1) response be submitted per country or organization.

General Information

1. Please provide your full name:
Mrinalini Rai
2. Please provide your Email address:
Mrinalini.rai@gmail.com
3. Please indicate in what capacity you are responding to the survey. (Please indicate with an **X** next to your selection).
Other (Please specify): **CBD Women Caucus**
4. What country or organization do you represent?
Women4Biodiversity / CBD Women Caucus

Section One

Sustainable use of biological diversity in the post-2020 global biodiversity framework

5. Do the draft goals and targets of the framework adequately incorporate all the considerations of the sustainable use of biological diversity, as defined by the Convention*?

- a. What are the strengths in this regard? (Or What works?)
- b. What are the gaps in this regard? (Or What doesn't work?)
- c. What needs to be changed?

****The Convention on Biological Diversity defines "Sustainable use" as the use of components of biological diversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining its potential to meet the needs and aspirations of present and future generations.***

The CBD explicitly recognises in its preamble, "the vital role that women play in the conservation and sustainable use of biological diversity" and affirms, "the need for the full participation of women at all levels of policy making and implementation for biological diversity conservation."

Secure, legal tenure rights—particularly for women, youth, indigenous peoples, and other marginalized populations—as well as inclusive land governance, are foundational to achieving the goals of the monitoring framework of the Post-2020 Global Biodiversity Framework (GBF).

Sharp distinctions are drawn between conservation and sustainable use (Goals A and B) which do not capture the realities of territories of IPLCs which combine customary conservation and sustainable use.

Nature's contributions to people need to be complemented by peoples' contributions to nature (Goal B but also in Goal A) because good biodiversity outcomes arise from close relational values between humans and nature, not only from intrinsic or instrumental values, and women in these spaces are the knowledge holders, the one responsible for the intergenerational transfer of knowledge including of customary sustainable practices.

In addition, there is a need to address the right to a healthy environment for living in harmony with nature. The right to a healthy environment brings together all that humanity has learned about how human rights and the environment interact. It encompasses the environmental dimensions of the rights to life, health, food, water, sanitation, property, private life, culture, and non-discrimination, among others. They need to be linked specifically to substantive rights in the Post2020 Goals and Targets. Participatory rights are needed to exercise and realise substantive rights as elaborated by the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP), Convention for the Elimination of Discrimination Against Women (CEDAW), Rights of the Child, or as defined in international law.

Beyond equity, enabling and pursuing women's full, meaningful and effective engagement in biodiversity decisions is critical to ensure that biodiversity conservation and sustainable use efforts are successful in the long term.

An overarching recommendation throughout that needs to change is to pursue gender equality as well as gender-responsive indicators across the Goals and targets to ensure that relevant data is collected, analysed and monitored over time. Furthermore, whenever possible indicators should require data to be collected and disaggregated by sex (including by gender).

6. Does the draft monitoring framework for the post-2020 global biodiversity framework (i.e. current goals, milestones, targets, components of the targets, monitoring elements and indicators) incorporate the sustainable use of biological diversity in a balanced way?

What changes would you suggest to better reflect the sustainable use of biodiversity in the framework in a more balanced way

Though women's enormous potential to contribute to biodiversity conservation and their unique knowledge, contributions, roles and responsibilities in the sustainable use and conservation of biodiversity is being recognized, the draft monitoring framework fails to integrate their contributions and if failing to recognise them as agents of transformational change.

There are limited or no mechanisms in place to systematically map, collect and analyze women's and girls' roles and activities regarding biodiversity conservation and sustainable use, rendering their contributions invisible. This also applies to the analysis of the extent to which the loss of biodiversity disproportionately burdens women and girls. It is therefore imperative for a transformational post-2020 global biodiversity framework to recognize and promote the roles, rights, contributions and leadership of 50% of the world's population (women and girls) through related targets and indicators throughout the Goals, Targets, components, elements and indicators.

This is a recommendations to be considered throughout this survey submission.

7. Do the current Goals and milestones fully reflect the sustainable use of biological diversity? Please consider specific suggestions on Goals and milestones.

General comment on Goal C: It needs to expand benefit sharing from use of genetic resources and associated traditional knowledge to use of biological resources and to include broader other forms of benefit-sharing linked to conservation and sustainable use.

On milestones 2030 described, there should be inclusion of language around equitable and just distribution of benefits, including to women and indigenous peoples and local communities as populations requiring additional attention; call for diverse perspectives of rural land users, including women, youth, and indigenous peoples and communities, in assessing the

trends; and distinguish between small-scale provision from biodiversity and large-scale or commercial provision.

8. Can the current targets ensure the sustainable use of biological diversity? Please consider specific suggestions on targets.

For all the current targets to ensure the sustainable use of biological diversity, States must respect the rights recognised to indigenous peoples and local communities, including of women who have been correspondingly to their local biodiversity regeneration adapted ways of knowing, using and treating plants, animals and other life, their rights in respect to "indigenous and community conserved areas and territories, community-based management, customary sustainable use and community governance of biodiversity [...] taking into account international instruments and law related to human rights", like CBD states parties have already committed to do. (UNEP/CBD/COP/DEC/XII/5, Biodiversity for poverty eradication and sustainable development, paragraph 11).

We would very much like to recommend referring to the submission made on the Monitoring Framework for the Post2020 that included concrete recommendations on addressing elements that might be useful for suggestions to be taken into consideration for the targets on sustainable use, including IIFB, ICCA Consortium, Forest Peoples Programme (FPP), UNU-IAS, UNWomen and others, including ours (CBD Women Caucus).

Section Two

Sustainable use of biological diversity in the targets of the draft monitoring framework for the post-2020 global biodiversity framework

9. Target 4 - By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora, is legal, at sustainable levels and safe

Target 4 aims to reduce threats to biodiversity from overexploitation by ensuring that biological resources are used, harvested and traded sustainably. What needs to be changed, added or deleted to address overexploitation challenges? Please consider specific suggestions on components of the target, monitoring elements, indicators and baselines.

Customary sustainable use is an important part of this target. Monitoring mechanisms should include trends to ensure the full and effective participation of indigenous peoples and local communities in ensuring sustainable harvesting, trade and use of wild species of fauna and flora, including for subsistence and small-scale use by communities.

The monitoring components, elements and indicators should also incorporate relevant standards, including CITES, while respecting customary sustainable use, harvesting and exchange of natural products. Monitoring elements should ensure that harvesting, trade and use is respecting and recognizing the rights of Indigenous Peoples' including of women to customary use.

It is still unclear on the implication of the terms – harvest, trade and use and defining the use and limit of “safe” for human health and biodiversity.

The term “legal” in this Target is problematic and could have implications for indigenous peoples (including the criminalization of communities for customary wildlife use). Work by IUCN SULi and IPLCs perspective on the work done under WG8(j) on Customary Sustainable Use could provide more clarity and context to this target. Indicators could be related to community led plans of action on customary sustainable use, including and indicator on local diets.

Trends could explore look into the proportion of biological resources harvested legally in ways whose global impacts duly and fully comply with international law on human rights & environment.

Trends could look into proportion of biological resources harvested, traded and used which are most sustainable, through practices which best respect and secure human rights and environmental sustainability in compliance with international law realising fair and equitable access and sharing of benefits in terms of their global impacts as best adapted to regeneration of local biocultural diversity and ecosystems in compliance to ecosystem principles 1-2 (<https://www.cbd.int/ecosystem/principles.shtml>).

10. Target 8 - By 2030, ensure benefits, including nutrition, food security, livelihoods, health and wellbeing, for people, especially for the most vulnerable through sustainable management of wild species of fauna and flora.

How can the benefits arising from use of wild species of fauna and flora, such as nutrition, food security, livelihoods, health and wellbeing, be achieved without compromising long-term sustainability of biological diversity?

Does the target and its components cover all aspects relevant to benefits from use of wild species of fauna and flora? Please consider specific suggestions

Human well-being needs to include cultural aspects as we live and exist in environments where our culture impacts our daily lives as evidenced by COVID 19. The post 2020 GBF offers new and ambitious opportunities to put people and nature at the core with linkage to culture and a nexus to many other areas. Customary use and practices, and tenure rights could be added as additional monitoring elements (as there is an indicator on income for small-scale producers, and this is a result of certain practices and governance models)

There is a lack of reference to customary use. The right to food is defined as follows by the UN Special Rapporteur: “the right to have regular, permanent and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensures a physical and mental, individual and collective, fulfilling and dignified life free of fear”^[1].

^[1] Report of the Special Rapporteur on the right to food, Jean Ziegler, A/HRC/7/5, para 17. <https://digitallibrary.un.org/record/616943?ln=en>

Quantify women and girls, youth and IPLC's contributions, roles, control and access in sustainable fisheries management by putting in place equitable, intersectional and cultural appropriate indicators including disaggregated data by sex, age and ethnicity

Caution should be used when linking this indicator to sustainability. While volume of production per labor unit may indicate for some crops or in some ecosystems that commercial approaches provide advantages, this should be carefully weighed against rights-based and gender-based considerations for local land users.

Change to “trends in sustainable fisheries management, including **customary sustainable use and management by IPLCs**”

Change to: “Trends in terrestrial wild species of fauna and fauna used for food and medicine, **including customary sustainable use by IPLCs**”.

Proposed indicators

- Proportion of fish stocks under customary sustainable use and management by IPLCs”
- Number of plant and animal genetic resources sustainably used and conserved on IPLC lands and territories”
- Diversity of flora and fauna used for food security, livelihoods, and health and well-being”.
- Average income of small-scale food producers, by sex and indigenous status (SDG indicator 2.3.2), in addition – and producer type (e.g. family farmers, pastoralists, and fishers)”
- Number of countries with action taken to enhance decent rural employment opportunities, entrepreneurship and skills development, especially for youth (UN Decade on Family Farming)
- Number of countries with an improved set of institutions and strategies—including policies, guidelines, regulations and tools and programmes—aiming to generate decent rural employment, particularly for youth (UN Decade on Family Farming)
- Number of countries with action taken to accelerate gender equality and rural women’s economic empowerment (UN Decade on Family Farming)

11. Target 9 - By 2030, support the productivity, sustainability and resilience of biodiversity in agricultural and other managed ecosystems through conservation and sustainable use of such ecosystems, reducing productivity gaps by at least [50%]

Changes in land and sea use are some of the main drivers of biodiversity loss, what should be the main objective of this target to ensure that the sustainable use of biodiversity can continue to support the productivity of agricultural and other managed ecosystems? Please consider specific suggestions on components of the target, monitoring elements, indicators and baselines.

Production and productivity gaps should not be the main concerns under the CBD, the emphasis should be on sustainability of such production and resilience.

The reference to socio-ecological land and seascapes (SEPLs) could be considered to explore the integrated approach to landscapes that are a mosaic of managed and other ecosystems, and to broaden the scope beyond agriculture.

Equitable governance is essential to enable stewardship of local actors leading to mutual wellbeing. Quantify women and girls, youth and IPLC's contributions, roles, control and access in area of agriculture under sustainable practices by putting in place equitable, intersectional and cultural appropriate indicators including disaggregated data by sex, age and ethnicity.

Trends in area under customary, indigenous and/or local practices could be a useful monitoring element, especially linked to productivity, sustainability and resilience of biodiversity.

Proposed indicators

- Proportion of total agricultural population with ownership or secure rights over agricultural land, by sex; and (b) share of women among owners or rights-bearers of agricultural land, by type of tenure (SDGs 5.a.1 (a))
- Proportion of countries where the legal framework (including customary law) guarantees women's equal rights to land ownership and/or control (SDGs indicators 5.a.2)
- Proportion of total adult population with secure tenure rights to land, (a) with legally recognized documentation, and (b) who perceive their rights to land as secure, by sex and type of tenure (SDGs 1.4.2)
- Area of agricultural land where agrobiodiversity is conserved and sustainably managed by IPLCs”
- IPLCs food security, nutrition and livelihoods.
- Number of plant genetic resources conserved in community gene banks in-situ.
- Proportion of traditional knowledge over seeds preservation and utilization, also considering that much of the seed knowledge is with women.
- Suggest including an indicator disaggregating sustainable land use by sex

12. Target 13 - By 2030, integrate biodiversity values into policies, regulations, planning, development processes, poverty reduction strategies and accounts at all levels, ensuring that biodiversity values are mainstreamed across all sectors and integrated into assessments of environmental impacts.

Need to take into account that Indigenous and local communities "depend directly on biodiversity and its customary sustainable use and management for their livelihoods, resilience and cultures and are therefore well placed [...] to efficiently and economically manage ecosystems" (CBD Customary Sustainable Use Plan of Action UNEP/CBD/COP/DEC/XII/12, B, Annex, paragraph 6 b)

T13.1.Change to “Biodiversity and **indigenous peoples culture** reflected...”. Need to **integrate cultural values & TK** as well as biodiversity values into policies and planning since erosion of culture is a driver of biodiversity loss. (Sharm-El-Sheik Declaration on Nature and Culture) <https://www.cbd.int/doc/c/8b76/d85e/c62f920c5fd8c4743e5193e1/cop-14-inf-46-en.pdf>

T13.3. Change to “Biodiversity values and related cultural values are reflected....”.

Change each monitoring element to “which incorporate biodiversity **and related cultural** considerations” for T13.3

Ensuring integration of biodiversity considerations into planning, policies and regulations, development processes, and poverty reduction strategies should specifically include land line ministries. Tenure and land governance will be intimately linked to poverty reduction especially for rural land users, with disparate and unique impacts on women and girls, youth, and indigenous land users.

Indicator data to monitor progress towards this target, should be disaggregated by sex whenever possible and also reflect the differentiated values of women and men with respect to biodiversity and ecosystems conservation and sustainable use. This target also relates to key gender-biodiversity priority areas (equal engagement and leadership of women and men, equal access to resources, and equal benefit sharing)

Change each Monitoring Element to “Trends in integration of biodiversity and ecosystem service values and cultural values into...”

Monitoring elements should also recognize and include the work done on biocultural community protocols^[1], which is growing recognition and is used for protection of traditional knowledge and ensuring access and equitable benefit sharing for all relevant stakeholders. This element should also put in place previous prior informed consent mechanism, including and Community Based Monitoring and Information Systems (CBMIS).

Proposed indicators:

- Number of countries that have integrated cultural values across biodiversity and development policies and planning
- Number of countries that have integrated TK and IPLC languages across education systems
- Number of countries that have established national targets in their NBSAPs that is fully reflective of gender considerations, and addressed in national reporting.

Need for equitable, intersectional and cultural appropriate indicators including disaggregated data by sex, age and ethnicity.

13. Target 15 - By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions

Changes towards sustainable production and consumption will be critical to ensure the sustainable use of biological diversity. Is the target specific enough to ensure these changes and to promote the sustainable use of biodiversity?

Please consider specific suggestions on components of the target, monitoring elements, indicators and baselines.

While the proposed GBF Target 15 declares as its first aim to "eliminate unsustainable consumption patterns" in its components or monitoring it does not however identify an activity which would actually "eliminate unsustainable consumption patterns".

On what this target sets to do in practice regarding "sustainable consumption patterns" focus only on the different "trends in use of renewable natural resources", "biological resources" and "non-

renewable natural resources" as well as "trends in ecological limits reached or surpassed" would be statistically monitored and "trends in ecological limits reached or surpassed" - but there is a gap in commitment on action which would in practice prevent this.

It just aims "ensuring people everywhere understand and appreciate the value of biodiversity, make responsible choices" by highlighting a "new vision" and "peoples' responsibility for their choices" without commitments to prevent in practice our growing over-consumption which drives the accelerating growth of global biodiversity loss.

This neglects states' CBD obligations to "regulate and manage" any such "processes and [...] activities which have or are likely to have significant adverse impacts" and are "carried out under its jurisdiction or control" "regardless of where their effects occur" so that state can be "ensuring [...] conservation and sustainable use" of biological resources also "beyond the limits of national jurisdiction" (CBD articles 4 and 8 (c) & (l)).

Monitoring elements should capture "Trends in capacity to prevent over-consumption of non-renewable natural resources."

Addition to text 15.2: "...New social norms for BIODIVERSITY value and integration" instead of "sustainability" Redefine this element to be more culturally appropriate. In the global south it is already difficult to buy nutritious food, how could people afford to buy "organic-labeled" products? Redefine this element to be more culturally appropriate.

If in the global south it is already difficult to buy nutritious food, how people could afford to buy "organic-labeled" products? Particular impacts on women and girls due to their physiology, specifically pregnant women.

Cartagena Protocol, however, does not address gender issues specifically. It is important that the Protocol recognizes that the impact of introducing GMOs could be gender-differentiated because men and women have different knowledges, needs and vulnerabilities. Women worldwide, and specially women from indigenous groups and local communities, need to have access to information, skills, equipment, regulatory frameworks, and procedures. This will allow them to understand the issues, make informed decisions, manage, or avoid any potential risks associated to GMOs, have the capacity to implement the Protocol, and have an arena where their needs and concerns are heard and valued^[1] and the need to systematically consider and address their needs and identify and deliver gender-responsive technology driven by gender specific technology demands.

The monitoring elements should consider the mainstreaming of gender in the Cartagena Protocol and the National Biosafety Action Plans. This could serve as an indicator itself to ensure that safety of half of the world's populations health and well-being. Monitoring elements should include trends in development and adoption of measures to respect the rights of IPLC to reject LMOs on their lands and territories.

Indicators to measure women and girls' contributions, roles and responsibilities in sustainable consumption patterns by defining equitable, intersectional and cultural appropriate indicators including disaggregated data by sex, age and ethnicity as it relates to a key gender-biodiversity priority area (equal engagement and leadership of women and men)

Proposed indicators:

- People's rights to use lands, waters and forests primarily by customary sustainable ways empowered to prevent their non-renewable over-consumption in terms of material footprint per capita/GDP
- People's rights to customary sustainable use of biodiverse ecosystems strengthened to prevent ecological limits surpassed in terms of material consumption per capita /GDP

Need for equitable, intersectional and cultural appropriate indicators including disaggregated data by sex, age and ethnicity.

14. Other targets of the framework directly or indirectly support the sustainable use of biological diversity.

Please indicate what other targets should also incorporate a component related to sustainable use and what should this component be? Please name the target and describe the component you would like to suggest.

Target 1: All (not 50%) land and sea should be under some form of planning, including production areas where sustainable use takes place. "Planning" can include all land-uses, and it should be considered everywhere. Use should be sustainable overall and for the long-term, which can be achieved by applying a landscape approach at multiple scales.

Target 2: Should recognize that protected areas are not limited to no-touch zones, and that a continuum of different levels of use take place inside and beyond protected areas. Protected areas policy is also an area relevant to sustainable use, and the target should reflect that protected areas and OECMs have to fit into an overall landscape that enables sustainable use and healthy ecosystems in order to be effective. OECMs also need to include human, cultural, and societal elements, and also coverage of KBAs.

Target 3: "Active management actions" apply to both wild and non-wild species. We also need recovery and conservation of species actively cultivated, managed, and used by humans.

Target 5: Should also include an element of sustainable use, in that sustainable use is what suffers from IAS. This is implicit in the target, but could be made explicit, and monitored in terms of the amount of sustainable use that is damaged by IAS.

Target 6: This target says to reduce pollution but does not explicitly state that this pollution is the result of unsustainable use. This is also a sustainable use issue, as any use that produces too much pollution cannot be sustainable. Use activities could be added to the list of "trends in pollution from..."

Target 10: Assuming that trends in ecosystems contributing to air quality is eventually going to include things like forests, it should also be pointed out that sustainably managed productive ecosystems can also contribute, not only perceived “wild” areas.

Target 11: Sustainable use is also relevant to biodiversity and human health, in that sustainably produced goods are healthier for people. Something like trends in contributions to human health from sustainably produced products could be added to the elements.

Target 12: The focus here should be changed from “increasing benefits” to sustainably using and equitably sharing the benefits from genetic resources.

Target 19: The current elements and indicators do not seem to contain anything about information and traditional knowledge on sustainable use. It would be better to explicitly add these here to make sure they are not overlooked in implementation.

Section Three

Customary sustainable use in the draft post-2020 global biodiversity framework

15. How can the global biodiversity framework harness customary sustainable use by indigenous, local or traditional communities, as a strategy to achieve the goals of the Convention?

The fact that 80% of the remaining biodiversity is in the lands, territories and waters claimed and governed by IPs is clear evidence that the management system, traditional institutions and mechanisms, and knowledge system have been effective in guaranteeing the conservation of biodiversity and its sustainable use. Hence customary sustainable use works as a strategy for conservation and sustainable use of biodiversity.

CSU comprises the practices and knowledge of IPLCs as implemented in daily practices in the form of harvesting, processing, protecting, restoring, fishing, cultivating and other uses. Appropriate government policies that recognize the value, impact and scalability of CSU practices, and invest in CSU, can help safeguard the conditions and values for its implementation. Good examples are forms of legislation, often at subnational level, that:

- protect and support traditional agro-ecological practices and agricultural practices integrated with forest and other ecosystems,
- safeguard local fishers’ practices, both men and women
- preserve local agro-biodiversity, seed diversity, and protect the role rural women as keepers of agro-biodiversity.

In the GBF 2010-2020, Target 18 profiled the strategic importance of customary sustainable use and its enabling conditions: By 2020, the traditional knowledge, innovations and practices of indigenous and local communities relevant for the conservation and sustainable use of biodiversity, and their customary use of biological resources, are respected, subject to national legislation and relevant international obligations, and fully integrated and reflected in the

implementation of the Convention with the full and effective participation of indigenous and local communities, at all relevant levels.

In the current draft post-2020 GBF (draft 0.5), there is no such dedicated target, nor direct reference to customary sustainable use as such. Direct reference to sustainable use is in targets 4,8,12, while in targets (9) and (17) the reference to sustainable is implied. In target 19, there is reference to traditional knowledge (not use) which however is key condition and prerequisite for customary sustainable use. Customary sustainable use is not yet strategically integrated in the framework. Reference to Article 10c of the Convention could be further strengthened in the framework.

By encouraging further documentation of customary sustainable use practices, GBF can further encourage parties to recognize the value of CSU in biodiversity and ecosystem conservation, food and water security, mitigation and adaptation to climate change as forms of nature/culture-based solutions. GBF can further consider the need to encourage positive incentives like recognition and mobilization of resources to ensure CSU continues to contribute to the conservation and restoration of biodiversity and ecosystems functions.

16. Is customary sustainable use currently used as a strategy in conservation and sustainable use of biodiversity? Is CSU implemented through policies and/or projects? Please elaborate.

17. What are the traditional occupations/livelihoods dependant on biodiversity that are unique to your country and what are the trends in those activities, including their intergenerational transfer?

Please refer to the submission called for Transformational Change: Best Practices for Gender-responsive Biodiversity Policy and Action - Call for contributions (SCBD/SSSF/AS/JS/TMc/88955 (2020-040)) for which the CBD Women Caucus contributed to with 8 case studies that showcases the contributions and initiatives by women from Asia, Africa and Latin America. Should you need a copy of the submission, please let us know at mrinalini.raiwomen4biodiversity.org

Please specify whether sexdisaggregated data exists and include one or two examples if possible. How can the global biodiversity framework recognize and protect those activities?