

UNEP - UNEA
Programme of Work 2020-2021 Budget Envelope Options

CPR-143 28 September 2018

Comments by EU + MS

EU+MS LTT

General

- We welcome the idea of a “retreat”-format at the ASC to discuss implementation of the POW, as well as the draft POW/B.
- In general, we find it important to link the experience with implementation of the existing POW/B to improve the POW/B to be agreed.
- In that light we emphasize the importance of reporting, including on Programme Performance and the bi-annual Performance reports,
- However, improvements can be made in those reports to link implementation activities to concrete results achieved.

On the proposed Programme of Work:

- The EU+MS thank UNEP for the draft proposed Programme of Work 2020-2021. We believe it is a useful document to start discussion. At this stage, , we can only provide preliminary comments, but would need more time to provide detailed comments to the proposed sections of this POW,. For the next round of comments we would prefer to offer you these in track changes in future versions of the document. It would be helpful if you could provide us with a clear timeline of when comments would be expected...
- We welcome the POW is well structured and that the different subprogrammes bring together the relevant SDG-targets, UNEA-resolutions and expected accomplishments.
- We agree that it should be clear for MS how UNEP’s work contributes to the Agenda 2030 and UNEA resolutions in a coherent manner.
- We would welcome if the narrative in the introduction of the POW/BU would reflect the important role of UNEP/UNEA for Agenda 2030 implementation (in line with the UNEA-2 resolution)
- It should also be made clear which role UNEP should play in the UN Development Reform, both financially and substantially. The POW/B should highlight how UNEP will integrate/cooperate their efforts to assist countries at the country level with regard to environmental protection within the new system of regional coordinators .
- Under the headline “stakeholders”, UNEP seems to be more focused on the private sector than civil society. UNEP needs to develop the justification for this in the document.
- In light of the 2030 Agenda we would also request to further highlight throughout the POW/BU how gender aspects are taken into account. Only in the strategy section for the climate change subprogramme (p. 25) UNEP states that it will implement gender-sensitive actions and promote south south cooperation. We suggest to include a separate section for this, or include it in the section for the executive direction and management.
- The strategy section of each subprogramme should be strengthened to describe the main areas of interventions, how this relates to the key environmental issues to be addressed and how the different activities together contribute to the key objectives of the subprogrammes.

- On the addition of UNEA-resolutions to relevant subprogrammes:
 - Could UNEP clarify the implication of the placement of a resolution under a specific subprogramme?
 - Each subprogramme contains a table listing “UNEA resolution delivered through that subprogramme”. Can UNEP clarify what requests to UNEP in that resolution are included are in the subprogramme? What does it imply for the many cross-cutting resolution that cannot be implemented through a single subprogramme (e.g. UNEA 3/4 “Environment and health” that contains section on climate change, biodiversity, chemicals and waste, etc.)
- Interlinkages and collaboration between subprogrammes could be further explored and elaborated in the document.
- It is important that the activities undertaken in the context of the POW/B are clearly described. At this stage it is unclear if and how ‘new’ activities, such as the BRI and GPE are covered in the POW/BU. We would welcome more clarity on this. In several places the units of measures for indicators are clarified. This is very useful. However we note that many indicators are mainly output related, rather than . We would welcome to work towards outcome related indicators whenever possible.

With regards to UNEP’s **results framework and PoW indicators** :

- The EU + MS acknowledges the difficulty of attribution in the case of monitoring of higher level outcomes, impact and indicators. However, the EU + MS emphasizes the importance for UNEP to demonstrate how their efforts contribute to these results measured and we believe that the indicators should be improved to achieve this, where ever possible:
 - Some of the indicators proposed in the PoW are very general, do not depend solely on UNEP’s action and thus do not help to monitor UNEP’s impact (e.g. Increase in the proportion of countries in which environmental issues are addressed in national disaster risk reduction strategies). It could be useful that UNEP systematically add more concrete and specific indicators which would allow us to measure in a simpler what each subprogramme concretely does (e.g. Percentage of country requests for emergency response met by UNEP).
- It is relevant to follow up changes on country level, as proposed, however this need also be complemented with an analysis of attribution, or contribution, and preferably indicators at programme level in order to be able to follow up how UNEPs initiatives contribute to the outcome or impact level indicator.
- Could UNEP clarify why, especially when they are quite similar to its proposed indicators, UNEP does not propose to use SDG indicators as indicators of achievement? It seems it would reduce the administrative burden and more directly link the PoW to the SDGs, these should then be complemented by specific indicators that do relate to the effectivity of UNEPs work, as stated above.
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- We welcome the sections describing external factors influencing delivery on the PoW. We recommend that the strategy for each subprogramme includes an analysis on risks that would impede UNEP to achieve the expected accomplishments and what would be done to mitigate these risks (not only external factors).

On the budget

- In June we expressed our concerns with regards to the proposed budget envelope options. Unfortunately our concerns at this stage remain and we feel we first need a better understanding of the consequences of the option proposed by UNEP in the document we discuss today.
- Regarding the allocation of resources, we strongly underline the importance to **work for a larger and broader donor base**, especially for the Environment Fund, to ensure **predictability and an effective delivery** of the programme of work we, as member states, collectively endorsed (or will endorse and adopt). Therefore, we want to signal a **strong commitment to the Environment Fund**, while also keeping in mind past data and **maintaining realism, acknowledging the wish of donors to support special initiatives with earmarked funding**.
- We would like to highlight the ‘criteria’ or principles that the budget proposal should follow, including:
 - Sufficient ‘core funding’ of the PoW
 - Transparent, i.e. clarity on what are considered ‘core activities’ of the PoW to be financed by the UN regular budget and the EF, and which are related to earmarked funding or global funds.
 - Balancing Ambition with Realistic budgeting.
- Following these criteria, there should be flexibility to adapt the proposal (or if other options emerge), also in light of the development of the result-based PoW.
- We underline the importance to have a transparent, inclusive and open preparation of the POW. The POW/B should clearly state what are considered core activities of the POW to be funded through the EF and what activities will be undertaken through earmarked funding. Increased transparency will assist MS to have a clear understanding what the POW is expected to deliver, as well to assess their contribution to the EF. We request that the next iteration of the POW/B clarifies this further.
- With regard to the proposed budget:
 - We think it would be useful to discuss a bit more how a right balance could be found between realism and ambition approach. A too ambitious target for the EF can be counter-productive for some donors but a too-low EF level might also be counterproductive by not motivating donors.
 - we would like to understand more in details the pros and cons and underlying motivation of the budget proposed, how this relates to the anticipated resources as well as the activities in the POW.
 - Can UNEP detail what are the risks associated with the proposed budget option of 910 million dollars? For example, the proposed decrease of the EF would mean a reduction of the VISC for each MS. It would thus entail a decrease in the contributions to the EF of some of the regular contributors who respect the VISC.
 - We suggest to organize a more indepth discussion between MS and the secretariat to discuss this more in detail on short notice.
- Can UNEP also provide more information on the “more flexible instruments and avenues” it is developing (paragraph 21) to encourage contributors to provide less tightly earmarked contributions.

We look forward to the further development of this POW and future discussions.
