Comments are sent from the Secretariat of Environment and Sustainable Development of Argentina to the Draft Ministerial Declaration of UNEA IV.

I- General Comments:

The Declaration foresees a series of commitments, many of which imply a significant effort for developing countries. For this reason, it is suggested to include references to means of implementation as well as mentioning the Principle of Common but Differentiated Responsibilities and the Principle of Gradualism.

In the first paragraph of the Vision, it is suggested to maintain the language adopted in the 2030 Agenda and refer to sustainable patterns instead of responsible patterns of consumption and production, as it appears in the text under analysis.

II- In relation to the Main priority 1 "Ensure the access and use of global environmental data and develop innovative digital initiatives":

Caution should be exercised in the dissemination of data, since there are issues that are being negotiated in other international forums and that have not yet been resolved (for example, digital sequence, genetic information and synthetic biology - which are discussed in the framework of the Convention on Biological Diversity).

In line with the above, on the other hand, this type of initiative implies an important financing effort, which is why it should be mentioned in a paragraph of the Declaration (means of implementation).

In addition, in this Draft it is proposed to develop a strategy and global action plan on environmental data, under the auspices of the competent bodies of the UN. In this regard, we understand that it is important to strengthen national environmental data systems as a first step, even prior to the development of a global system. This seems to be contemplated in paragraph b) of Priority 1, which talks about strengthening existing systems. If this is the case, we welcome the mention of paragraph b).

III- In relation to Main priority 2 "Promote sustainable and efficient management to decarbonize, detoxify, decouple and increase the resilience of ecosystems":

Paragraphs c) and d), linked to sustainable land management and sustainable agricultural practices, are in line with the work that Argentina has been carrying out with the National Action Program for the fight against Desertification, Land Degradation and Drought Mitigation. At this point, the need to have financial assistance mechanisms to achieve the proposed objectives is highlighted.

Although the measures contained in paragraph e) are currently frequently applied, even in our country (labeling systems, digital product resource passports, environmental footprint of products and life cycle models), the scope of these incentives should be analyzed, in particular with regard to the fact that they may eventually lead to the establishment of non-tariff barriers.

In subparagraph 1), an indicator (without a defined percentage) of the expected increase in sustainable public purchases is mentioned. We expect the definition of this percentage in order to be able to analyze if it is within a feasible range for our country.

IV- Regarding the Main priority 3 "Support the full involvement of civil society, citizens, the private sector and academia in promoting innovative approaches to address global environmental challenges and sustainable production and consumption":

The first subparagraph refers specifically to education: access to environmental education and promotes innovative approaches such as inclusive citizen science and social innovation programs, although it does not clearly emerge from the title of this priority objective. The same can be said of the second subparagraph, since it is also related to education, since it talks about integrating sustainable consumption and production policies into the curricula.

For this reason, it might be pertinent to reflect this criterion in the title of this Main Priority, which only refers to the involvement of the different actors, but does not speak of the issues of awareness and education, especially those related to consumption.

Subparagraph e) mentions the traditional knowledge of indigenous communities, a topic that does not arise from the title and that is treated in the scope of the Convention on Biological Diversity.

The context in which this topic is mentioned is not understood, nor is the final relationship with the eradication of poverty. In the CBD, the subject of traditional knowledge is linked to access to genetic resources and fair and equitable sharing of the benefits derived from its use, but it is not linked to environmentally friendly practices. This reference is too vague and since benefits for people are not specifically mentioned but rather a general reference to more sustainable economies it's made, it does not appear in what way it will contribute to the eradication of poverty.

Paragraphs c), f), d) and g) relate more specifically to the stated priority objective.