Canada's comments on the zero-draft Ministerial Declaration for UNEA-4 (30 November, 2018)

 Canada thanks the Estonian Environment Minister for preparing this elaborated draft text and we appreciate the opportunity to comment. We are committed to work with the President and Member States to reach a successful and robust text that all can stand behind.

General comments:

- While we appreciate that the draft is action oriented, the text is rather lengthy and technical in nature and includes many commitments, including quantitative targets. As others have expressed, we view a Ministerial Declaration as a higher level and shorter political document.
- We share the concerns expressed by the EU, African group and GRULAC that it
 would be difficult to reach global agreement on quantitative targets in a
 Ministerial Declaration. It might be more realistic if the text include clear
 commitments to set ambitious domestic targets in certain areas, without
 necessarily including specific figures.
- We share the suggestion by the EU that the Chapeau should refer more strongly to sustainable consumption and production (SCP), being the theme of the Assembly, with clear alignment to the SDG 12 language.
- The Chapeau should also refer to supporting the implementation of the 2030 Agenda and the SDGs.
- Regarding the structure, like the EU we suggest the Main Priority 2 may be better placed as new Main Priority 1. That way the commitments to policy action on SCP and other environmental issues would more visible and action on data would come as supporting tools and means to achieve the new Priority 1.
- As explained in the specific comments below, we are concerned that some of the data-related proposals in the text (for e.g. develop a global environmental data strategy and action plan... but also others) are unclear and have a high risk of overlap with ongoing work or global initiatives within the UN family.
- We welcome the emphasis on plastics and would like to ensure that it remains strong (see also specific comments below on this). Building on the momentum from our G7 Presidency, Canada has been advancing the Ocean Plastics Charter, which takes a comprehensive lifecycle approach to prevent marine plastic pollution and lays the groundwork to ensure that plastics are designed for

- reuse and recycling, in order to protect the environment and keep a valuable resource in the economy.
- The Declaration should include a reference to women's leadership and gender equality (see suggestion in that respect below).
- We would like to see a stronger importance given throughout the text to action that builds resilience (climate resilience, coastal resilience, including financing...) and have suggestions in that respect in our specific comments.

Specific comments:

Notwithstanding our general comments about shortening meaningfully the text and reordering the Main Priorities 1 and 2, we offer the following comments on some of the specific proposals to explain our position on certain issues and hopefully help tighten the text. We would be pleased to provide more detailed editorial comments when reviewing the subsequent drafts.

Main Priority 1

- 1 a): we have some important concerns about this proposal to "develop a global environmental data strategy and action plan" and the establishment of a new task force to that effect. A lot of work, in particular under the UN auspices, is ongoing around environmental data, and this proposal may be unnecessary and create duplication. We would suggest instead a call so that knowledge and expertise are available to collect the data required to monitor and assess the 2030 Agenda and SDGs.
- 1 b): it is unclear which systems are to be strengthened and which are to be established.
- 1 c): we strongly suggest to include "Indigenous and Traditional Knowledge" in any text that lists difference sources of data (noting that it is already included in Main Priority 3).
- 1 d): we suggest adding "climate change impacts" to the list.
- 1 f): we are concerned about this call to create a new program within UNEP on global environmental data. How is this differing from UNEP-Live? Before creating new programs, the priority should be on strengthening existing ones, to avoid unnecessary duplication.

Main Priority 2

- Like the EU, we think references to SCP and circular economy should remain robust in future iterations of the text, and to this, we would add the issue of plastics.
- As mentioned in the general comments, this section could also benefit from stronger references to action on resilience and we would suggest for example language such

- as: "Through multistakeholder engagement, public-private partnerships, strengthening development finance institutions, and capacity building for improved country-level planning and project preparation, we enable the decarbonisation of critical infrastructure and innovative solutions for coastal resilience, such as expanding insurance coverage to natural capital".
- 2 c): we suggest adding "adaptation" to the list (as in climate change adaptation)
- 2 f): We suggest the insertion of the notion of resilience to read "green and resilient infrastructure".
- 2 g): we think hazardous waste should also be a special focus and the language could read: "with a special focus on hazardous waste, food waste, plastics waste and marine litter".
- 2 h): In addition to our general comment about including quantitative targets in a Ministerial Declaration, it is difficult to measure "reuse" in the economy.
- 2 i): we strongly support a reference to the sound management of chemicals and waste. That said the focus on funding in the text reduce somewhat the scope and we would like to broaden the focus. It is not just about funding but action that is needed to advance the sound management of chemicals and waste. We would remove "long term funding" and replace by "action to advance the sound management…."
- 2 j): We would like to raise caution about this proposal. Phasing out single use plastics depends on availability and accessibility of viable alternatives, taking into account their full environmental impact, as well as accessibility considerations for persons with disabilities.
- 2 l): we would also raise caution about this proposal because in the absence of a clear and agreed upon definition for "sustainable procurement", it is unclear if including a numeric target is possible. Alternative language could be: "We agree to set ambitious domestic targets for public procurement of sustainable products and share best practices to stimulate demand and reduce the use of resources".
- 2 n): we would welcome a clear reference to unlocking new capital for sustainable investment and to the role of the private sector in this. We would propose for example: "We accelerate sustainable and innovative financing opportunities and solutions, and build innovative partnerships to unlock new capital for sustainable investment, as innovation from the private sector is key to ensuring clean growth for future generations".

Main Priority 3

As mentioned in the general comments, we think the Declaration should include a strong reference to women and gender. We suggest the following language for example: "We recognize that women's leadership plays a critical role as agents of

change in realizing sustainable development and we ensure that gender equality will continue to be at the center of our efforts".

- 3 c): it should not be limited to citizens but include all stakeholders including businesses.
- 3 e): the last part of the sentence referring to poverty eradication is unclear. In addition, we would like to suggest a reference to societal resilience be included here.
- 3 f): like for 3 c), this is incomplete without listing the full range of stakeholders: private sector, municipalities, youth, Indigenous Peoples, women...