



Feedback Switzerland

Chemicals and Waste, Air Quality

Environmental Governance

2nd Draft of PoW and Budget 2010-2021

Weblink : [PDF Document \(TC\)](#), [PDF Document \(clean\)](#)
Version Draft UNEP : 8 October.2018
Document Reference: R384-0591
Date Submission : version 23.10.2018, for ASC, 22-26 October 2018

Federal Office for the Environment FOEN
Sebastian König
Papiermühlestrasse 172, 3063 Ittigen
Postal address: 3003 Bern
Telephone +41 58 46 330 05, Telefax +41 58 46 303 49
sebastian.koenig@bafu.admin.ch
www.foen.admin.ch



Chapter	Page/Table	Paragraph / Section	Proposed changes to text	Argumentation / Comments
Subprogramme 5; Chemicals, waste and air quality	59	2 nd row: Indicators of achievement: (i) Increase in the number [...]	(i) Increase in the number [...], where possible applying a multi-sectoral approach	Delete; a “where possible” indicator cannot be measured.
Subprogramme 5; Chemicals, waste and air quality	59	2 nd row: Indicators of achievement: (ii)	(ii) Increase in the number of private companies/industries that have undertaken action on improving chemicals management	How will UNEP measure this? Same comment for the Indicator of achievement of the waste management of companies.
Subprogramme 5; Chemicals, waste and air quality	62	Para 77	The subprogramme will continue to support the implementation of this and other relevant chemicals, pollution and waste-related multilateral environmental agreements ⁵² as well as the Strategic Approach to International Chemicals Management ⁵³ .	There needs to be more information and a clear indication in the budget how UNEP will fulfil this crucial task.
Subprogramme 5; Chemicals, waste and air quality	63	Para 84	The UN Environment Programme will emphasize the importance of emerging issues identified in the resolutions adopted by the International Conference on Chemicals Management and the Programme will continue to support implementation of international action towards the achievement of the 2020 goals and the development and implementation of the post-2020 framework on chemicals and waste.	There needs to be more information and a clear indication in the budget how UNEP will support the development and implementation of the post 2020 framework on chemicals and waste.

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Subprogramme 5; Chemicals, waste and air quality	65	Para 93	The achievement of these outcomes rests on the assumption that relevant laws, regulations and legally binding agreements (multilateral environmental agreements) will be increasingly implemented and enforced and that there will be continued momentum in the private sector to support the environmentally sound management of chemicals and waste and sustainable chemistry.	The focus should remain on the environmentally sound management of chemicals and waste as this has been the term used in the relevant conventions whereas the term sustainable chemistry has not yet reached a clear definition and is not embraced by all stakeholders.
Subprogramme 5; Chemicals, waste and air quality	76	2 nd row: Indicators of achievement: multiple instances	(i) Increase in the number of governments at all levels [...] -> delete respective footnotes 57 and 58	Since UNEP does not have a mandate to work at subnational level, it is questionable to which extent <u>all levels</u> of government can be taken as an indicator for achievement.

Subprogramme 4: Environmental governance	70	Para 93	Delete: 93. [...] It will strengthen and expand its collaboration with UN entities and bodies and other international organizations working on environmental governance, including UNDP, UN DESA, [...]	Listing a select number of UN entities bears the risk of forgetting one (e.g. WHO). A more generic formulation would be preferable. Alternatively, the complete enumeration could be done in a footnote.
Subprogramme 4 : Environmental Governance	69	Para 89	Delete adjust. “... Environment Management Group, a key avenue to ensure the UN system follows coherent approaches to the environment. The UN Environment Programme will continue to identify issues on the international environmental agenda that warrant cooperation, and finds ways of engaging its collective capacity in coherent management responses to those issues to promote the uptake of environmentally sound practices in the UN system through initiatives dedicated to greening the United Nations operations ...”	The EMG is instrumental for mainstreaming the environment into the UN system, including to deliver on the environmental dimension of the SDGs (see Nexus Dialogues). It is not the work of UNEP and the EMG to a be greening the offices of UN entities and conventions. EMG must engage in political, strategic work on placing the “environment” in other parts of the UN system. Per mandate, the EMG identifies issues on the international environmental agenda that warrant cooperation, and finds ways of engaging its collective capacity in coherent management responses to those issues. https://unemg.org/about-us

Subprogramme 4 : Environmental Governance	70	Para 94	“[...] The sub-programme also facilitates the achievement of the thematic objectives of other sub-programmes by putting in place the enabling conditions for environmental action in all environmental spheres.”	What does this mean? Could or should that not be the case with all subprogrammes?
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