

EU/MS written comments on the PoW/B 2018-19 implementation and the draft POW/2020-21

General

- EU+MS 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 preparation of the POW/B (2020-2021) to be agreed by UNEA4.
- In this light we emphasize the importance of reporting, including on Programme Performance and the bi-annual Performance reports,
- We note that improvements can be made in those reports to link implementation activities to concrete results achieved and related budget requirements.

On the reports of implementation on current POW

The EU+MS thank UNEP for the information provided in the presentations:

- We welcome the wealth of information provided, which gives a good overview of the activities to implement the POW. However, in future presentations, we would welcome the information to also provide a better overview of the results achieved versus the output of activities in order to assess whether and how the POW contributes to the overall objectives.
- Furthermore, we would welcome to get a better insight on future reports and briefings as to which activities relate to the core budget, compared to budget from Earmarked funding as well as the criteria used to divide the core budget between the (objectives of) sub-programmes agreed in the POW.

On the proposed Programme of Work and budget:

The EU+MS thank UNEP for the draft proposed Programme of Work 2020-2021 as well as the revised documents providing answers to questions raised earlier.

- We welcome the POW is well structured and that the different sub-programmes 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 2030 Agenda and UNEA resolutions in a coherent manner.
- We welcome that the current draft POW/B reflects the important role of UNEP/UNEA for 2030 Agenda implementation (in line with the UNEA-2 resolution). In light of the 2030 Agenda, we would also request to further highlight throughout the POW/B how gender aspects are taken into account. We also welcome that UNEP included a separate section for this, which could be elaborated further and made more concrete throughout the different sub-programmes.
- The POW/B could also benefit from a more integrated poverty perspective. 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. The document should clarify how UNEP’s budget and expenditure as well as activities would be impacted by the financial implications of UN Development Reform. It should indicate how the costing arrangements for the Resident Coordinator system affect UNEP’s budget from its implementation onwards (to take effect in 2019).

- Under the headline “stakeholders”, UNEP seems to be more focused on the private sector than civil society. We would welcome justification further elaboration on stakeholder engagement as well as partnership development in light of the Theories of change provided in the sub-programmes.
- The Lessons Learnt section provides a useful overview of the main changes within each sub-programme, but it could be elaborated further and be more straightforward on what worked well and what not. The EU/MS would like to suggest to integrate the specific lessons learned in the strategy sections per sub-programme and to focus on the key lessons learned in this section inform the previous and current biennium, including on institutional matters that will help improve governance, transparency, efficiency and effectiveness, Results Based Management to facilitate successful and effective deliver the POW throughout its sub-programmes
In particular, we would like to receive further clarifications on the implications the integration of the implementation of UNEA-resolutions to the POW in relevant sub-programmes. Furthermore, we require further clarification on the extend of those activities, which are being considered to be integrated to the POW. Does this constitute merely a display of the delivery of the sub-programme to the achievement of the particular resolution listed, or does it mean that activities foreseen in the resolutions would become part of the POW?
- EU/MS consider the proposed POW & Budget 2020-2021 should include two options on the following subjects: with and without integration in the POW of the UNEA 3 implementation plan "Towards a Pollution Free Planet", specifying its precise budgetary implications in terms of core and earmarked funds to the relevant sub-programmes, as well as for the future of the GPA, pending the discussions during the IGR4 meeting later this month on Bali. The implications for the current POW/B should also be highlighted.
- Interlinkages and collaboration between sub-programmes and activities should be further explored and elaborated in the document.
- The objectives of the POW should be the basis to distribute the core funding, taking into account earmarked funding amounts on sub-programmes.
- It is important that all foreseen activities, which require substantial resources from UNEP or could generate significant political interest are well described in the POW/B or substantially consulted with UNMS. We would welcome more clarity on whether these activities are integrated in the POW/B, how they are in line with already agreed strategic priorities within the POW/B and contribute to the Sub-programme objectives and activities, including the related budget estimates and to what extend they would be covered by the core funding of UNEP. Furthermore, it should be clear how those activities relate to UNEPs mandate and existing multilateral processes.
- In that light, we would like to reemphasize the importance for UNEP to consult with UNMS before to take on new activities, which require substantial resources from UNEP or could generate significant political interest not anticipated in the POW/B. We therefore suggest to present these activities as optional in the POW/B, including related budget impacts, as well as sources of funding.

With regard 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. We therefor like to reemphasize the importance of focusing on indicators outcomes/results

vs output, wherever possible, also consistently using results-based management. For example:

- It is indicated on page 28 that “all performance indicators [...] refer to contribution or support by UNEP”. However, some indicators are quite explicit (e.g. “Increase in the number of countries supported by UN Environment Programme with institutional arrangements in place to coordinate national adaptation plans”), whereas many others seem to measure results that are in good part independent of UNEP’s activity (e.g. “Increase in the number of countries that have technical capacity to integrate ecosystem-based management into national adaptation plans”).
- We understand the need to have some continuity in the indicator set from one POW to the next. Yet we believe that the indicators should be improved to allow us to assess the effectiveness of the Sub-programme activities and the concrete results of each sub-programme (e.g. the already existing “Percentage of country requests for emergency response met by UNEP”) in an effective, yet simple manner.
- 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. At the same time, UNEP should keep focus on its core mandate.
- We welcome the sections describing external factors influencing delivery on the POW. We continue recommending that the strategy for each sub-programme 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 regard to the proposed budget envelope options.
- Regarding the allocation of resources, we 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). We emphasize the importance to balance the ambition on the delivery of results with the reality of mobilizing Secretariat’s resources for seeking finances. By this, we mean that more efforts and resources are put into implementing the agreed programme and achieving clear results. Therefore, we want to repeat a strong commitment to the Environment Fund, while also keeping in mind past data and maintaining realism.
- EU/MS call on UNEP to actively work towards making non-earmarked contributions a more attractive option to improve flexibility and horizontality in the work of the organisation. An important part of achieving this is to ensure transparency and consultations with MS when new projects are being initiated, including consulting on a financial plan for these.
- Considering earmarked funding, we encourage UNEP to improve the governance of this type of funding to maintain the multilateral and horizontal nature of the work of the organisation. This could include reviewing the existing legal documents that guide bilateral agreements to ensure, for example, appropriate IPR protection and due diligence clauses.

- We are notably reserved on the idea of creating new Trust funds to that effect (as suggested in the footnote page 6). Multiplying Trust funds does not seem to be an adequate answer to increase transparency and concentrate funding through the Environment Fund.
- On the proposed budget envelope options, we highlight the following concerns:
 - a lower level for the EF does not reflect the ambition of secure, stable, adequate and increased financial resources entailed in the universal membership of UNEA and strengthened international environmental governance
 - We are concerned about the potential further imbalance between the highest contributors to the EF and those who contribute at a lower level, in case of reducing the proposed EF budget, as outlined in the response to our comments submitted in September.
 - With regard to funding from the global trust funds, we note that a considerable amount of income expected for the climate change sub-programme depends on the pipeline of projects for the GCF (78 million dollars for 2020-2021), which is subject to approval by the GCF board; at the same time the budget for GEF-7 will be lower
- However, considering these risks, and acknowledging that UNEP tries to strike a balance between ambition and realism with this budget proposal, the EU encourages UNEP to further elaborate the POW based on budget envelope option C.
- We would like to highlight that the budget proposal should:
 - Provide sufficient ‘core funding’ for the POW.
 - Balance ambition with realistic budgeting.
 - Increase transparency on core areas and deliverables. Increased transparency will assist MS to have a clear understanding of what the POW is expected to deliver, as well to assess their contribution to the EF.
- These criteria would help to plan the long-term implementation of programmes and ensure UNEPs independent position and focus on multilateral initiatives.
- UNEP has given some clarification on what it considers to be ‘core areas’ to be funded under the EF and how they are prioritised (on page 12). In our view, the POW/B proposal at the moment insufficiently applies these principles across the sub-programmes. The POW/B should indicate clearly (a) primary source(s) of funding for these core areas, e.g. in the table of outputs of each sub-programme in order to strengthen transparency and allowing us to identify core deliverables receiving support from the EF.

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