

## EU + MS comments on draft UNEP Ocean strategy

### General comments:

- We welcome the draft strategy. We understand that this is a very first draft of a Strategy, which would need to elaborate a structural framework, so that it can be read clearly: what the basis is, what the existing strategies are and the expected outcomes, how the implementation frameworks can be used in that context and how the implementation of the Strategy would be monitored
- Given the urgency regarding the degradation of marine ecosystems, a short-term strategy for improving the marine ecosystems is crucial. The report currently notes: "UN Environment aims to be a driving force to ensure that in 50 years' time, marine and coastal ecosystems are healthy, thriving, and resilient to a wide range of human impacts, including as a result of our changing climate." Hence, such a long-term approach should not neglect shorter-term actions.
- The report could have a stronger linkage between the potential role of UNEP and the blue economy, given the challenges we globally face in this respect.
- It is crucial to note that an Oceans strategy needs to be inclusive with respect to all current initiatives, in order to create cross-benefits and an inclusive strategy
- The text regarding stakeholder engagement is still guide vague and would benefit from further elaboration
- We would like UNEP to clarify in what form will it be presented to the UNEA4 for decision, and what are the next steps?
- We would also appreciate further explanation how this draft would be interlinked with the draft UNEP PoWB.

### Specific comments:

- Given the mandate of UN Environment and well identified problem of 'all indicators of ocean sustainability are in the red' (p.9), when identifying challenges and drivers for change, it would be important to elaborate further on pressures and emerging challenges. The UNEP is best placed to play an important role in addressing the conservation and addressing of pressures to create conditions for a sustainable blue economy. Clear identification of the mandate of UN Environment would be also useful in the context of UN Oceans (challenge quoted under 5. at p. 9). The role of other UN Agencies (FAO, RFMOs, etc.) could perhaps be expanded somewhat to show where UN Environment has a clear mandate/role and where other organizations come in.
- The document is welcomed by the EU+MS, especially its integration of the Source-2-Sea approach.
- On Our Common Ocean: Strengthening the Regional Ocean Governance Framework, section 5.1 should also in the bullet points on page 10 address that the regional seas framework also provides an important setting for work on marine litter and other pollution.
- Recognizing the role of Regional Ocean Governance is important and identifying the vision of strengthened support to coordination of Regional Seas Programmes and Action Plans (RSCAP) would clearly need to be elaborated. Ideas for further policy-interactions with RFMOs and LMEs are welcome, however, it would be important to have a clearly identified vision of the expected outcomes in coordination and implementation of RSCAPs to start with.
- Chapters on MPAs, Marine Pollution, Marine Ecosystems and Protection of Marine Biodiversity and Addressing Pressures (be it climate change, fisheries etc) would need to be elaborated and clearly interlinked with expected outcomes, while relying on the existing implementation frameworks.
- On Marine pollution, section 5.2: here it would be important to address not only waste pollution, but also other sources such as eutrophication, hazardous substances and include e.g. conventions

dealing with these issues. In this section the references to the UNEA initiative Beat Pollution is absent. This initiative is also of importance for the marine environment. Also the reference in the bullet point to the “Ad Hoc Open-Ended Expert Group on Marine Litter” is incorrect. This Ad Hoc group is not working under the mandate of GPA.

- On climate and Ocean nexus, section 5.3.1: In general, we are positive towards exploring the nexus. When dealing with UNFCCC's mandate and implementation of NDCs, it is important to use existing UNFCCC systems for measuring, transparency and verification and not create separate systems.
- The report seems to make (or forgets to make) certain random references to other procedures. For example, in 2.2 a reference to the UN ICP is not taken into account, whereas under section 3 a reference to the “Washington declaration” is not included and in section five a reference to the BBNJ is excluded. Hence, the report seems to neglect several important elements or processes (GPMN, GPW, IMO strategy on CO2 reductions, etc.).
- An important chapter on assessment of the status of marine environment (including the references to all the substantial issues) is missing, there is only reference on Environmental Economics and Assessment and valuation. However, in order to be able to guarantee both conservation and sustainable use, the quality assessment of the status of marine environment should be facilitated in sea-basins and obviously, the linked resource mobilisation would need to be strategically foreseen.
- In the text, a reference to the Convention on Wetlands, the Ramsar Convention needs to be done in this draft strategy. Although, it is not an UN convention, there are many designated sites under this convention in, or extending into the marine environment (areas not over 6 m depth at low tide). The IWC is mentioned, for example.
- The role of UN Environment should be elaborated against the implementation framework available within UN Environment for ocean- and seas-related issues and in particular RSCAP, therefore, marine and coastal focus is very important.

#### Textual comments on specific paragraphs

- p.6 : “An illustration of such gathering is the UN Ocean Conference, a series of meetings to be held every three years from 2017 to 2029 to review progress on SDG 14. The commitment-heavy annual Our Ocean Conference is another which brings together governments, private sector, non-governmental organizations, academia and UN agencies.”
  - o EU+MS comment: We would suggest that the strategy also comport a reflexion on the adequacy to maintain those two parallel processes that both imply commitments in favor of ocean sustainable use and conservation
- p.7 : “The opportunities listed above are some of the many that can help curb the environmental and governance challenges facing the ocean. To further enhance an effective and comprehensive ocean and coastal management, there is a need for each actor to define their role in the ocean space.”
  - o EU+MS comment: This paragraph does not seem very clear about the “opportunities” it refers to. Furthermore, it does not concern only the Blue Economy but the ocean policies and governance as a whole, so maybe it should be displaced to the introductory part.
- p.7 “the World Bank announced the creation of ‘PROBLUE’ a multi-donor trust fund to support SDG14, addressing marine pollution, overfishing, coastal erosion and sustainable growth of coastal economies”
  - o EU+MS comment: the funding windows of ProBlue quoted here are approximate. We suggest to replace them by the official ones : improving fisheries governance, addressing marine litter and pollution, blueing of traditional sectors and supporting new economic activities and supporting integrated seascape approaches
- p.7:

- EU+MS comment: One point could be added on the WestMED initiative, that gathers 10 states of the West Mediterranean basin in a common governance to support and implement blue economy projects in the region.
  - p.15: "Science/policy interface"
    - EU+MS comment: A mention of the UN Decade of Ocean Science for Sustainable Development (2021-2030) could be added to mobilize the scientific community, policy-makers, business and civil society around a program of joint research and technological innovation.
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