World Animal Net (WAN) is grateful for the opportunity to provide input on the proposed thematic areas for the 2021 UN Environment Assembly. Please find below our comments and suggestions.

Facing Current Environmental Crises: Transformative Change Needed

The selection of an appropriate theme for UNEA 5 is an important and critical task. The theme must contribute to the implementation of commitments made by the 2030 Agenda and other Multilateral Environmental Agreements, as well as fully address the recent recommendations laid out by the Intergovernmental Panel on Climate Change (IPCC) and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). It must also be capable of producing an ambitious ministerial outcome document and accompanying resolutions which support member states in addressing the myriad environmental crises we currently face. It is key that the theme adequately addresses the magnitude and scale of these current crises, and fosters the needed transformational change to achieve the future we want: for people, animals and nature.

We are rapidly approaching our environmental point of no return. We are set to lose over a million species, many within mere decades, and our chances to meet the targets agreed by the Paris Agreement are rapidly diminishing. Across the world, we are increasingly bearing witness to the suffering caused by our changing environment: lives and livelihoods lost to natural disasters, growing numbers of climate refugees, and escalating conflict over natural resources.

In this moment, we are seeing the hottest temperatures on record. There are forest fires raging across the Amazon, the Congo Basin, the Arctic, and so many places in between, and youth are filling the streets, demanding policymakers take action to ensure that future generations have a livable future. Environmental defenders, who have dedicated their lives to ensuring such a future, are being silenced, intimidated, and murdered.

Business as usual has proven a failed endeavor. What is needed is transformative change: change that truly addresses the root causes and drivers of the environmental crises. This was stated unequivocally in the Global Environmental Outlook 6 (GEO 6), which “makes clear that achieving the SDGs will require transformation in our human lifestyles and productive activities: our industry, agriculture, buildings, transport, and the energy system which powers them.” In particular, GEO 6 calls for unsustainable practices to be phased out in order to achieve transformational change. This call was reinforced by the recent report of the IPBES which found that direct drivers of change in nature, including changes in land and sea use, climate change
and pollution “result from an array of underlying causes – the indirect drivers of change – which are in turn underpinned by societal values and behaviours that include production and consumption patterns, human population dynamics and trends, trade, technological innovations and local through global governance.” The IPBES report states that “bold changes to the direct drivers of the deterioration of nature cannot be achieved without transformative change that simultaneously addresses the indirect drivers”.

**Theme Preference: Thematic Area 2: Blue Planet: Transformative actions to protect our freshwater and oceans**

Given the depth of problems we face and the recommendations of key UN scientific reports, **our first preference for the theme of UNEA 5 is Thematic Area 2: Blue Planet: Transformative actions to protect our freshwater and oceans.**

We believe this theme is appropriate because of the need for system-wide transformations, including in sustainable consumption and production. The theme has a clear focus, is broad and inclusive, and forms interlinkages across environmental issues and SDGs. It is also clearly communicated and easily understood and links directly to social and economic considerations. In addition, this theme builds positively on the themes of previous UNEAs, which have focused heavily on pollution and sustainable consumption and production. This theme will also allow for policy coherence across other relevant frameworks such as the treaty on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction (BBNJ) and the Small Island Developing States Accelerated Modalities of Action (SAMOA Pathway).

If this theme is chosen, it is important to clearly define the meaning of “Blue Planet” and for it to not connote a “blue economy”. We strongly advise that it incorporate land as well as oceans, given that land-based activities impact oceans and freshwater ecosystems, and, therefore, protection of the latter is also dependent upon necessary transformative interventions on land.

**Suggestion to Incorporate Elements of Thematic area 3: Addressing the water–energy–food interlinkages for sustainability into Thematic Area 2**

In regard to the proposed **Thematic area 3: Addressing the water–energy–food interlinkages for sustainability**, we strongly believe that the food system itself needs to be examined as a major root cause and driver of biodiversity loss, climate change and pollution. The IPBES report stresses that pathways that can feed humanity while conserving the planet are possible through the “transformation of production [...], supply chains (e.g., responsible trade, phasing out harmful subsidies), and demand sides of food systems (e.g., waste reduction, diet change).” It also states that “Tackling the interlinkages between water, food and energy requires a more general, in-depth analysis of the food and agriculture system,” and that “the great expansion in the production of food, feed, fibre and bioenergy has occurred at the cost of many other contributions of nature to quality of life, including regulation of air and water quality, climate regulation and habitat provision.” Adopting a "Nexus" lens would restrict the scope of this important issue and thus limit the ability to consider this complex and vital area in its entirety. We believe that this issue could be better considered and addressed if incorporated under **Thematic Area 2**, particularly given the impact of the agriculture sector on freshwater and marine ecosystems.
Concerns About Thematic Area 1: Scaling-up/Implementing Nature-Based Solutions

We would like to register a number of concerns we have about Thematic Area 1: Scaling-up/Implementing Nature-Based Solutions for a clean environment and sustainable development.

1. **Nature-Based Solutions (NBS), while in some cases useful and effective actions to address environmental challenges, can in other cases result in “band-aid” solutions that fail to address the underlying root causes of issues.** For example, planting trees and reforestation areas is an important climate change mitigation action; however, it does not replace or minimize the need to phase out the use of fossil fuels, which are a fundamental root cause of greenhouse gas emissions. Further, if monocultures are used, ecosystem and biodiversity health are diminished, resulting in other problems in need of additional solutions.

2. NBS is a relatively new concept, with no one agreed-upon definition. For example, the European Commission and IUCN already appear to have differing definitions for NBS, and NBS are often framed in broad and sometimes esoteric terms. Because of this, “there is a danger of oversimplification, reinventing the wheel, (non)deliberate misuse, or generating new, unforeseen trade-offs in decision-making.” We are worried that the term is still in its nascent stages and is still developing a sound knowledge basis, and therefore it would be inappropriate for it to be the core theme of UNEA at this time. Further, the broad and diverse framings of NBS, in combination with its sometimes technical nature, mean that it is not a theme that is easily communicable to a broad audience.

3. **NBS are sometimes slanted towards innovation, market incentives, and commodification of nature through ecosystem services, rather than towards the conservation of biodiversity and ecosystems.** We are concerned that in this light NBS could become a new way to communicate fundamental “business as usual” values and approaches. Protection of biodiversity and ecosystems must be a key goal in addressing environmental problems.

4. **NBS, as its namesake, prioritizes solutions. This can lead to the assumption that there is already agreement regarding the problem.** Lack of equity among stakeholders can also mean that some stakeholders will benefit disproportionately from “solutions,” while the problems faced by those furthest behind continue to be ignored. From this perspective, we are concerned by the private sector’s wide promotion of NBS.

There is a real risk that the NBS approach can be seen as a panacea, absolving key stakeholders from taking the necessary fundamental changes needed to address root causes and lead transformative change. Where GEO 6 and the IPBES report called for the phasing out of unsustainable and harmful practices, NBS seems to promote approaches that in some cases merely cope with the proliferation of unsustainable practices.

Because of this, we strongly advise the following if this theme is selected for UNEA 5:

- Root causes and drivers must be acknowledged and addressed in tandem with any NBS.

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2 Ibid.
3 Ibid.
• The conservation of nature, biodiversity and ecosystems, rather than the appropriation of nature for capital, is clearly and unequivocally articulated as a key goal of NBS.

• Transformative change is fundamental to the future we want. NBS must be clearly defined as one tool for achieving the transformative change we need, as a means to an end, rather than an end in and of itself.

• It is also important that nature and animals not only be seen as having instrumental value to human endeavors, including “solutions” to the ecological crises we are confronting. We urge UNEA and parties to consider the interests of other species and the impacts of climate change, biodiversity loss and ecosystem decline on them, and to consider solutions that can also benefit them, notwithstanding their economic value to human societies.

• Equity must be mainstreamed into all NBS approaches. Rights-holders, including women, Indigenous Peoples, and youth, are not mere stakeholders, and must be given a key role in both defining problems and identifying, refining, designing and approving NBS initiatives. For example, research has shown that investing in educating girls and removing barriers to family planning, when combined, are two solutions that would be more effective at reducing greenhouse-gas emissions and slowing climate change than any other climate mitigating solutions, including behavioral changes and technological solutions.

World Animal Net appreciates the opportunity to provide input and we look forward to sharing our thoughts and feedback on future consultations.