

Comments by

WORLD RESOURCES INSTITUTE (WRIO)

Carole Excell <CExcell@wri.org> wrote:

Dear Alexander,

Thank you for giving the World Resource Institute an opportunity to comment on UNEP's new report "Towards a Pollution Free Planet". Unfortunately because of the quick turnaround time we were not able to consult widely across our institute or with The Access Initiative partners (<http://www.accessinitiative.org/>).

I have attached detailed comments as notes within the document.

Overarching comments are as follows:

1. I wish to congratulate UNEP for taking on a deep dive on issues of pollution . This is long overdue and a worthwhile effort.
2. We are happy that reference to Principle 10 and its role in addressing right to information , participation and justice is mentioned in the report. The report however fails to have strong enough governance recommendations or they are left to the end of the report and not integrated into the framework . The report needs to more fully recognize the impact of the Aarhus Convention and the new convention being negotiated in Latin America and the Caribbean on principle 10 , the Bali Guidelines and their role to galvanize action to ensure the public's right to know about pollution. Recommendations related to Principle 10 implementation have a very limited role in the report which needs to be strengthened.
3. The report could highlight even more strongly the integration of issues of pollution with the SDGS and how they can be tackled as part of countries implementation of the SDGS especially including the Governance SDG.
4. The reports recommendation and provision of information is stronger for some types of pollution more than others e.g. recommendations on water pollution and plastics, specific toxic contaminants are weaker than recommendations on air quality

5. Efforts by civil society , plaintiffs and those harmed by pollution and the actions of public interest lawyers to address pollution issues are not recognized significantly in the report. Many countries have failed to take efforts to control pollution without tragic incidents including Bhopal and others and this needs to be clear in the report that action is urgently needed to prevent reoccurrence.
6. People with disabilities need to be mentioned specifically
7. The Polluters pays principle is barely mentioned in the report and it is fundamental to addressing the issues related to pollution and why it is an externality that is not dealt with appropriately by Governments, companies and consumers
8. The overarching framework needs to be visualized in a more appealing manner to the reader
9. Some of the principles mentioned in the report universality, sustainability, integration, precaution and inclusiveness are defined in terms of different principles e.g. transparency vs. inclusiveness and precaution vs. prevention. This is incorrect.
10. The report mentions that the most vulnerable communities bear the burden but does not speak enough to human rights e.g. right to clean water , right to a healthy environment and the interplay with human rights and the environment
11. There is not enough use of civil society data for the reports contents. The environmental democracy index although not global has clear findings about the lack of transparency about Facility level data around the world as well as the lack of information provided by large cities about air and water pollution . This needs to be mentioned.
12. The growth and spread of Pollutant Release and Transfer Registers is an important piece of data and context for the report.
13. Tied to the release of data about pollution is the need to release data about enforcement and compliance . While the report does touch on enforcement and compliance not enough is said about recommendations to change the status quo around secrecy in taking action against corporate polluters.
14. The recommendations related to plastic and waste were weak , information on countries efforts to address this problem as an issue of consumption and production and where successes have been found to address the scale of this problem are not evident. This is no longer a national problem but a global problem because of the oceans and the report provides no clear recommendations on next steps.
15. Not enough was said in the report on health and environmental impact assessments and the role they should play in ensuring the mitigation of pollution and the participation of communities not just in permitting decision-making but in monitoring and then their ability to take action when harmed. In almost every country we have worked the barriers for citizens to prove harm against Government and corporate polluters is still too great and free standing rights to take action where standards have been breached in terms of pollution are just not available to local citizens.

I hope these comments and those in the document that I have attached are helpful in the reports revision. WRI as always stands ready to play an active role in UNEA and the activities that UNEP is interested to take leadership in . We are launching a report on Communities right to know about pollution in August of this year and happy to share this with UNEP specifically with the accompanying recommendations as well.

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