

United Nations

UNEP/CPR/145/5/Add.1



Distr.: General
19 February 2019
English only



United Nations Environment Assembly of the United Nations Environment Programme

145th meeting of the Committee of Permanent Representatives to the United Nations Environment Programme

Nairobi, 19 February 2019
10:00 a.m. to 1:00 p.m; 2:30 p.m. to 5:00p.m.
Conference Room 1

Agenda Item 5: Consideration of resolution of UNEP/EA.2/Res.10: Oceans and Seas

Comments Tracker for Proposed new Marine and Coastal Strategy of UN Environment Programme for 2020-2030 – Overview of Member States comments to initial draft Marine and Coastal Strategy presented to CPR 143 (11 Dec 2018) and UN Environment Programme’s response and revisions of Strategy submitted to CPR 145

Comments Tracker – Overview of Member States comments to initial draft Marine and Coastal Strategy presented to CPR 143 (11 Dec 2018) and UN Environments response and revisions of Strategy submitted to CPR 145

	Member State’s review comments	UN Environment Programme response and revisions
	<i>EU & EU member states (December Version)</i>	
1	<p>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:</p>	<p>Significant amendments have been made to the structure to gain the clarity as recommended. For example, impact pathway developed to achieve a clear overall vision and specific outcomes. New Sections 5: Theory of Change and 6: Strategic Objectives & Core Outputs identify problems/barriers, strategic objectives, activity areas and outcomes across sub-programmes towards medium- to longer-term impact by 2030.</p> <p>Also, five ‘guiding principles’ has been identified to realize this vision: adopting ecosystem-based management, source-to-sea approach, sustainable consumption & production, natural capital approach, strong science-policy interface.</p>
	<i>what the basis is,</i>	Section 7 “ <i>The basis for action</i> ”; additional sections and content added
	<i>what the existing strategies are? and the expected outcomes?</i>	Section 7.2 “ <i>UN Environment’s framework that guides the Strategy</i> ” makes explicit references to the Medium-Term Strategy (MTS) 2018-2021 and Programme of Work. Section 5 “ <i>The theory of change towards ocean-based sustainable development</i> ” and Section 6 “ <i>Strategic objectives and core outputs</i> ” explain the expected outcomes. Content from Section 7 in the previous version was incorporated in this section, augmented with new content
	<i>how the implementation frameworks can be used in that context and</i>	This has been addressed in several under Section 7 “ <i>Basis for action</i> ” where this is explained in sub-sections 7.1 “ <i>International frameworks guiding the Strategy</i> ” and 7.2 “ <i>UN Environment Programme framework that guides the Strategy</i> ”. This is further elaborated in Section 7.3 “ <i>Collaborations and Partnerships</i> ” that explains how global to regional to national partnerships and frameworks will be used to support strategic implementation
	<i>how the implementation of the Strategy would be monitored</i>	A short section 9 “ <i>Monitoring and reviewing the strategy</i> ” is included, with a full M&E framework pending detailed programming and work planning

2	<p>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.</p>	<p>The revised strategy is now explicitly aligned with the 2030 Agenda; hence a timeline of 2030 compared to the previous 50 years. See further “Introduction” and Section 5: Theory of change.</p> <p>Section 6 “<i>Strategic objectives core outputs</i>” now also makes very specific references to the key outputs and what will UN Environment do in its strategic implementation – actions that are already being undertaken and new objectives and actions being pursued within the 2030 time frame of the strategy.</p>
3	<p>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.</p>	<p>The concept of ‘sustainable blue economy’ is now made more explicit through strategy, including vision and mission, theory of change and in section 6 “Strategic objectives and core outputs”</p>
4	<p>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</p>	<p>An account is given in section 7 “<i>Basis for action</i>” and the following sub-sections, incl 7.3 “<i>Collaboration and partnerships</i>” key these linkages are made. These are also further elaborated in the Section 6: “Strategic objectives delivery and core outputs”</p>
5	<p>The text regarding stakeholder engagement is still guide vague and would benefit from further elaboration</p>	<p>This follows the comment above; refer to content in section 7.3 “<i>Collaborations and Partnerships</i>”</p>
6	<p>We would like UNEP to clarify in what form will it be presented to the UNEA4 for decision, and what are the next steps?</p>	<p>A timetable on the process and steps is communicated to CPR</p>
7	<p>We would also appreciate further explanation how this draft would be interlinked with the draft UNEP PoW.</p>	<p>This has been specified under the section 7.2 - “<i>Medium-Term Strategy (MTS) 2018-2021 and Programme of Work</i>”, and detailed overview presented in new Annex 2: mapping strategic objectives and outputs across MTS 2018-2021 .</p>
8	<p>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.</p>	<p>It was determined that section 2 “<i>Challenges and Opportunities</i>” should be very succinct as these are already well elaborated in existing documentation. Investment is hence concentrated in the document on the strategic approach to address the challenges</p>
	<p>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</p>	<p>Strategic objectives and outputs addressing environmental dimensions of ‘sustainable blue economy’ is now included across the Strategy, suggesting specific roles of UN Environment on this cross-cutting topic</p>
	<p>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).</p>	<p>This is clarified for example in section 7.1 “<i>International frameworks that guide the Strategy</i>”. Will have to consider the extent we elaborate roles of all</p>

	The role of other UN Agencies (FAO, RFMOs, etc.) could perhaps be expanded somewhat	sister agencies – some are included, not all. References are also included in section 6 <i>“Strategic objectives and core outputs”</i>
9	The document is welcomed by the EU+MS, especially its integration of the Source-2-Sea approach.	The Source-to-Sea approach is further elaborated in section 4 <i>“Strategy guiding principles”</i> and in section 6 <i>“Strategic objectives and core outputs”</i>
10	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.	This is addressed in 7.3.2 ‘National to global collaboration’ and 6.3 a) ‘Regional ocean and coastal governance, cross-sector policy dialogue and coordination frameworks’. The marine litter and wider pollution linkages are further captured 6.2 a) <i>“ ‘Sustainable consumption and production and source-to-sea solutions to address land-based and sea-based pollution’</i>
11	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.	The role of the Regional Seas Programmes is contextualized for example in Section 7.3 and 6.3 a). .
12	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.	These are further strengthened in 6.2 and 6.3 <i>“Strategic objectives and core outputs”</i> . Coordination with sister UN agencies are outlined in different sub-sections of 6.3 and 7.3.1 Multilateral partnerships
13	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.	This is captured in section 6.2 <i>Strategic Objective 2: ‘Build circularity in our economies and promote sustainable consumption and production approaches to address marine pollution and resource use’</i>
	In this section the references to the UNEA initiative Beat Pollution is absent. This initiative is also of importance for the marine environment.	Captured under section 6.2 a) and section 8 <i>“Communication and Education”</i>
	Also the reference in the bullet point to the <i>“Ad Hoc Open-Ended Expert Group on Marine Litter”</i> is incorrect. This Ad Hoc group is not working under the mandate of GPA.	Reference removed.
14	On climate and Ocean nexus, section 5.3.1: In general, we are positive towards exploring the nexus. When dealing with UNFCCC mandate and implementation of NDCs, it is important to use existing UNFCCC systems	Focus on climate-ocean nexus has been enhanced throughout, particularly in 6.1. ‘Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions’, 6.1 b) ‘Enhancing scenarios on ecological, socio-economic and climate-related drivers’, and 6.3

	for measuring, transparency and verification and not create separate systems.	'Nature-based climate change solutions supporting sustainable blue economies'. References to work of UNFCCC are included in section 7. Basis for action', incl. multilateral partnerships.
15	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.).	The redraft attempts to better capture the pertinent references to these processes and frameworks
16	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.	This is elaborated in section 6.1: 'Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions' and particularly 6.1. <i>Strategic Objective 1</i> : 'Integrated ecosystem assessments and ecosystem services valuation', where the discussion is expanded beyond the reference to Environmental Economics and Assessment and valuation.
17	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.	A few conventions are referenced, but it's not a comprehensive list as it could become expansive. For consideration, guidance needed.
18	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.	Contextualized in section 3: 'Mission' and further in 6.3 a) 'Regional ocean and coastal governance, cross-sector policy dialogue and coordination frameworks'; references to Regional Seas Conventions and Actions Plans are strengthened and references included to other marine-related conventions.
19	page 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 reflection	Opted to remove the reference in the specific context. There is acknowledgement through the document of the multiplicity of engagements on ocean conservation. It would be difficult in the main document to try to make an exhaustive review; the question would be why mention initiative over another.

	on the adequacy to maintain those two parallel processes that both imply commitments in favor of ocean sustainable use and conservation	
20	page 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.	Tried to be more specific in the later sections of the document
21	page 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	Opted to remove the reference; refer to section 6.4. <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i> for narrative on issue
22	Page 7: o 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.	Opted to remove the specific reference to WestMED
23	Page 15: o 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.	Focus on science-based policy expanded through the Strategy, incl. Section 4: Guiding principles; section 9.1 <i>Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services</i> ; and new dedicated section on UN Decade on Ocean Science added in 7.3.1.
24	There is a lack of clarity as to what is being proposed and how it could be achieved. Inclusion of a list of actions with timings will help stakeholders measure impact and success rate.	Will be addressed in implementation plan, and Monitoring & Evaluation framework
25	As an important issue to ocean governance, we should take into account the relevant UNGA's resolutions on the law of the sea and on oceans, particularly resolution 72/74.	Reference elaborated in section 7.1.2: 'UNLCOS'
26	The aim to strengthen the regional ocean governance frameworks the UK sees as key requirement of the strategy.	Incorporated in 9.3 'Regional ocean and coastal governance, cross-sector policy dialogue and coordination frameworks'

27	On marine litter, welcome the acknowledgement that increased governance and approach is required together with the need for cross-sectoral communication and collaboration. Also welcome the recognition of the need for a 'Source to Sea Approach' which will be crucial to address land based activities and pollution.	Well noted.
28	Inclusion and clarity of how and where UN Environment will look to work with others to increase synergies and decrease duplication of efforts would be welcome.	Has been addressed in section 7. Basis for Action (incl. partnership) and 6. Strategic objectives, clarity provided on means to promote synergies and avoid duplication (e.g. SDG implementation).
29	p.7: "On regional and national level, new legislations, procedures and partnerships have emerged along with implementation strategies and follow-up mechanisms." Comment: Reference to 'partnerships' should also include The Commonwealth and its Blue Charter, G20 and the GPAP (Global Plastics Action Partnership).	Partnership section made more generic, opted to remove references to specific partners/partnerships.
30	On p.9, part 5.1. "Our Common Ocean: Strengthening the Regional Ocean Governance Framework", 1st para, we propose the following: "The unsustainable use of marine ecosystem services and resources, requires stronger governance mechanism.	Addressed in section 6.3
31	On p.10, part.5.1.1, we propose the following amendment: "UN Environment will continue to encourage such efforts to develop a regional network of national marine protected areas. UN Environment in close cooperation with competent national authorities will move to develop science-based assessment" " UN Environment will continue to further promote marine protected areas governance enhancing effectiveness and actual performance of designated areas.	Text clarified in section 6.3 d)
32	We need clarifications regarding the sentence "also ensuring equitable distribution of marine protected areas costs and benefits among relevant stakeholder" . The meaning of this sentence is unclear. It is a matter only of the coastal state to ensure the equitable distribution of marine protected areas costs and benefits.	The meaning is further contextualised in 6.3 opening section on integrated management
33	p. 13 5.3.3. UN Environment should recognise ghost gear as a priority matter within the plastic and wider marine litter agenda. Not only is ghost gear high harm, it also reduces fish stock numbers. It is also of significant economic threat, given its ability to damage maritime vessels, fisheries and ecosystem services. UN Environment alongside UN FAO would provide an excellent platform resolve these issues and support the UN Sustainable Development Goals and improve the marine environment.	Strengthened partnership and collaboration with FAO reflected in 6.2 c) Trade and trade-related policies for environmental sustainability and resource efficiency, and 6.3 e) Measures mitigating environmental effects of fisheries on biodiversity and ecosystems Specific activities on ghost gear to be addressed in implementation plan
34	On p.15, part 5.5. "Science Policy Interface", 1st para, 6th line, we propose the following: "...The approach advanced under the Economics of	Reference made to TEEB in 7.3.3 'Thematic partnerships'

	Ecosystems and Biodiversity (TEEB) will continue be built upon in the ocean space as 'TEE-for-Oceans' that takes into account, among other criteria, science-based assessments on ecosystem health relevant policies as well as fiscal enabling instruments that enhance blue economy opportunities..."	
35	An up-front comment or inclusion of the need to collect evidence on the state of the ocean environment, the need to develop greater understanding of how the ecosystems within oceans function and connect, and the role of science and innovation in monitoring the state of the ocean and mobilising international efforts to managing human impacts would be welcome. The role of evidence and science is implicit but more needs to be made of it;	Role of science is strengthened through the Strategy, for example in section 4: Guiding Principles; section 6.1 'Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions'; and 7.3 Multilateral partnerships and UN Decade on Ocean Science for Sustainable Development
	When referring to 'academia' as a critical stakeholder, the definition should include government scientists, who will have a critical role to play in decision making and influencing within Governments around the world; We would welcome an explanation of how UN Environment will work together with the IOC and others within the science-policy interface.	Fully agree, see further response above.
Canada (December Version)		
1	Section 6 of the draft Strategy addresses the various roles and responsibilities in addressing marine pollution. Suggestion to instead focus on roles and responsibilities in implementing the UNEP strategy, which is the main subject matter. In particular, section 6.1 would benefit from clearly outlining how UNEP is going to implement the strategy, i.e. process timelines, reporting back to Member States and reviewing.	This is compiled in the sections from section 7 " <i>The implementation framework</i> " onwards. The review and report-back is in the section 12 " <i>Monitoring and reviewing the strategy</i> "
2	Clearer, more explicit link to the Program of Work and Budget could be made	Elaborated in section 7.2 'UN Environment's framework that guides the Strategy' and new Annex 2 'Mapping objectives and outputs across MTS'
3	Editorial changes: Page 11 –should state: <ul style="list-style-type: none"> o Ocean Plastics Charter o G7 Innovation Challenge to Address Marine Plastic Litter • Page 12 – small edit: 'supporting member states.... 	Removed these references; details may be elaborated in detailed workplan
4	Editorial edits Annex 2: Page 2 – Revisions to statement on Ocean Plastics Charter point should state: <ul style="list-style-type: none"> - o Ocean Plastics Charter - in 2018 at Charlevoix, G7 members (Canada, European Union, France, Germany, Italy, United Kingdom) committed to take action toward a lifecycle management approach to plastics in the 	Removed the previous Annex 2. Such details may be elaborated in detailed workplan

	economy. In addition to these original signatories, Jamaica, Kenya, Mexico, Norway, Republic of Marshall Islands, Netherlands, Senegal, Nauru, Palau, and Cabo Verde, as well as 20 companies including Unilever, Ikea, Nestlé and Volvo, have also endorsed the Charter as of December 12, 2018. The charter includes specific targets and goals.	
5	Editorial edits Annex 2: Page 2 – Information about Innovation Challenge should state: G7 Innovation Challenge to Address Marine Plastic Litter – aims to incentivize the development of innovative social or technological solutions for a more sustainable management of plastics throughout their lifecycle in order to increase resource efficiency and to reduce marine plastic pollution including by finding innovative ways to enhance waste management of plastics that may become marine litter.	Removed the previous Annex 2. Such details may be elaborated in detailed workplan
<i>New Zealand (comments on December version)</i>		
	The strategy should clearly articulate and address only those issues that fall within UNEP’s mandate with regards to marine and coastal ecosystems. The draft would benefit from being clearer about UNEP’s niche and value-add in this space, in particular with regards to marine and coastal ecosystem management. We add that the strategy should avoid assuming responsibilities that fit within the primary mandate of other agencies and programmes.	Acknowledged, revised strategy addresses this issue where the language is more focused on marine and coastal ecosystems management.
	We also suggest that the draft strategy is shared with other UN Oceans organisations for their input.	Draft Strategy introduced to UN-Oceans members at the annual meeting (7-8 Feb 2019, Geneva) for comments and inputs. Specific collaborations with relevant UN organisations will be further discussed during the detailed programming of activities to deliver the Strategy after UNEA-4.
	The document should mention the UNFCCC as one of the relevant organs whose work touches on oceans issues.	Addressed in new Section 7 Basis for Action, incl. 7.3.1 Multilateral partnerships.
	Section 2.1 on challenges would benefit from touching on cross cutting issues where oceans are not the focal point but are relevant, such as climate change.	Acknowledged, language strengthened, for example Section 6.1 a) Integrated ecosystem assessments and ecosystem services valuation, and 6.1 b) Enhancing scenarios on ecological, socio-economic and climate-related drivers.
	We are unclear how the work of the “network of scientists and experts on key marine coastal ecosystems” referred to on page 12 would differ from work currently being undertaken by the IOC, and would request further detail in that respect.	Noted, the role and work of UN Environment top strengthen the science-policy interface is clarified through Strategy. See for example new section 4.5, emphasizing the ‘application’ of scientific evidence on policy-making, as well as new section 6.1: Establish knowledge-base’, emphasizing the essential

		<p>normative role to guide research and ecosystem assessments to address key policy- and management questions and information need.</p> <p>IOC/UNESCO: Further strong collaboration is envisioned with IOC (and others), including through the Decade of Ocean Science for Sustainable Development in four specific (see further new section 7.3.1):</p> <ul style="list-style-type: none"> i. Enhancing data and science on natural, social and economic conditions, processes and drivers impacting oceans and coasts through interdisciplinary studies, expert groups and research collaborations; ii. Targeted research and tool innovation to strengthen ecosystem-based ocean and coastal policy-making, planning and management; iii. Enhancing regional and global cooperation, knowledge integration and science-policy interface to support ocean governance for sustainable development; iv. Enhancing national, regional and global capacities and awareness for achieving ocean-related sustainable development.
	<p>The final bullet point on page 12 refers to the fishery sector being a “pilot sector to assess and mitigate the sector’s impacts on the marine and coastal ecosystems and to promote a wise use of the conservation measures for fisheries benefits.” New Zealand would like more detail on this proposal, including information on how it would be substantially different to work undertaken by the FAO.</p>	<p>Further clarified in section 6.3 e).</p>
	<p>Section 5.2 could be an opportunity to more clearly discuss circular economy concepts as they apply to, and effect, the ocean.</p>	<p>Captured in 4.3, further elaborated under 6.2.</p>
	<p>With respect to language on the climate-ocean nexus in section 5.3.1, New Zealand welcomes the proposed focus on promoting ecosystem-based mitigation of and adaptation to climate change. However, the IPCC is the appropriate forum for work on accounting methodologies for nationally determined contributions, not UNEP. The idea of incorporating stored and sequestered carbon in oceans in nationally determined contributions is still under discussion and there are concerns that doing so could inadvertently undermine the mitigation ambition in the Paris Agreement.</p>	<p>Wording on climate nexus refined/clarified under new section 6.1 b) and 6.3 c). Linkages to relevant global agreements and conventions (incl IPCC and other relevant bodies) are provided in for example 6.3 a) and section 7 ‘Basis for Action’.</p>
	<p>We note that the “New Deal for Nature” referred to in page 13 of the draft strategy is not agreed language of the Convention on Biological Diversity</p>	<p>Noted and language amended</p>

	<p>and, therefore, should not be mentioned in this document. We would also note that the process to determine the post-2020 biodiversity framework under the Convention on Biological Diversity has just begun and there is no agreement that it will be modelled on the Paris Agreement or that it will contain “Nationally Determined Contributions”. The following language should therefore be deleted:</p> <p>“...– possibly modelled on the Paris Agreement and its Nationally Determined Contributions (NDCs) which would be adopted by CBD COP15 in Beijing in 2020.”</p>	
	<p>Page 14 of the draft strategy states that UNEP will “operationalise” and “serve as operational host” for the <i>Sustainable Blue Economy Financing Principles</i>. Given that this is a regional programme, rather than a global one, New Zealand would like more detail on what this would involve and the thinking behind this.</p>	<p>The ‘Sustainable Blue Economy Financing Principles and <i>Initiative</i> is intended as a global effort. Currently in initial stage of development, close future consultations and collaborations with countries and other partners are envisioned for its development.</p>
	<p>In Section 6.3, local communities and local owners should be included as key stakeholders.</p>	<p>Noted</p>
	<p>Where the Annex discusses the role of the IMO, it would be useful to highlight its role in reducing emissions from international shipping.</p>	<p>The original annex 1 (Fragmented Ocean Governance) is removed</p>
	<p>Norway (Comments in CPR on December version of Strategy)</p>	
1	<p>Welcomed focus on UN Environment’s key role on SDGs, but need to be more explicit, i.e. what is value added of UN Environment on oceans? This is quite unclear from the draft strategy, needs further work.</p>	<p>Strengthened in Section 4 <i>The basis for Action</i>, and Section 6 UN Environment’s Comparative Advantage. Section 9 <i>Strategic Delivery and Core Outputs</i> where an account of the services/outputs is given and identification of the key actors</p>
2	<p>Needs further operationalizing and details on financing, like blue economy and innovative financing.</p>	<p>Section 9 <i>Strategic Delivery and Core Outputs</i> has elaborated extensively the operationalization of the approach; refer to Section 9.4. <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i></p>
3	<p>Needs to clarify how this differs from Green Economy? Strong body of work already exists. Need further focus on the peculiar aspects of ‘blue’ economy.</p>	<p>Section 5 <i>Strategy guiding principles</i> introduces this under ‘<i>Fostering the Valuation of Natural Capital</i>’. Further elaboration is made under Section 9.4 <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i></p>
4	<p>Some aspects need clarifying: surprised to not find any references to UNEA resolutions and decisions, e.g. marine litter and other resolutions.</p>	<p>References added under Section 4.2 ‘<i>UN Environment’s Framework that Guides the Strategy</i>’</p>

5	Need deeper details on normative work and science-based policy link (will provide more details in written comments).	Elaborated under Section 9. These details are made more explicit; this flows from the Theory of Change in Section 8
6	Some things could be further incorporated: for example IPCC report on oceans to be finalized 2019; GEO 6.	Elaborated under Section 9.1. <i>Strategic Objective 1: Enhanced Science-Based Understanding of Drivers Impacting Ecosystem Health and Services</i> ; references to climate change assessments on oceans. Further references under 9.3. <i>Strategic Objective 3: Effective Governance and Integrated Management of Drivers Impacting Marine and Coastal Biodiversity and Ecosystem Services</i>
7	Overall, must provide more substantive basis on the proposed UNEP leadership role on oceans. Want UN Environment to play a vital role in the solutions. Need to build this role with other actors and support from member states. Need to work for UN Environment being a key in the ocean agenda.	Enhanced narratives under Section 4 <i>The basis for Action</i> , Section 5. <i>Strategy guiding principles</i> , that reinforce the mandated UN Environment approaches to ocean ecosystem management. Section 6 <i>UN Environment's Comparative Advantage</i> further suggests where the niche lies. All this is elaborated in Section 9 <i>Strategic Delivery and Core Outputs</i> where an account of the services/outputs is given and identification of the key actors
<i>United States of America (December Version)</i>		
1	UNEP has not been tasked with an overarching coordinating role for all ocean activities, e.g. shipping, fishing, etc.	Acknowledged; adopted language that address this impression. Confined this to areas related to ecosystem management
2	We suggest as a preliminary step UNEP take stock of its programs, strengths, mandates and determine how it will best utilize these to achieve its mission.	Acknowledged; an elaboration of strategic objectives and outputs across MTS are provided in Annex 2.
3	On assessing the marine environment, the paper notes that UNEP will focus on the regional seas based state of the coasts or marine environment, including integrated marine ecosystems assessments, and we would like to better understand this approach to confirm this work would complement rather than duplicate the work of the WOA.	The approach regarding the Regional Seas Programmes on regional assessment and contributions to global processes (WOA) is outlined in section 6.1: Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions, in section 7 Basis for action, 7.3.1 and 7.3.2. The linkages with the Regular Process and WOA is captured under section 7.1 "International frameworks that guide the Strategy". The language is contextualized to complement the work of the WOA.
4	Some of the described work might fall within the mandate of other organizations, such as FAO (for example, "assess and explore measures to reduce negative environmental impacts, particularly from trawlers and industrial fishing efforts from the perspective of the impacts on the bottom ecosystems and by-catch").	The language has been modified to speak more to UN Environment's mandate and role around ecosystem services.

5	Annex 1 and 2 should be statements of fact describing programs or conventions and not make judgements about amount of time to undertake work (e.g. EBSAs), whether an issue is within a mandate (e.g. IWC), etc.	The original Annex 1 and 2 have been removed.
6	The strategy should provide a higher profile for science, products and services as a foundation for ocean governance, management, blue economy and sustainable development;	The document has been restructured to specify more concretely the science-based outputs, for example in section 4: Guiding Principles; section 6.1 'Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions'; and 7.3 Multilateral partnerships and UN Decade on Ocean Science for Sustainable Development
7	The strategy should more extensively consider how UNEP partners with other organizations outside the UN.	Elaborated in new section 7 Basis for Action, incl. thematic partnership section and multilateral partnerships.
8	A decadal strategy of this magnitude should affirm UNEP's participation in the UN Decade of Ocean Science for Sustainable Development. The decade arc reaches from science, observations, data management, modeling, governance, science informed policy making, enhanced blue economy, jobs growth, and sustainable development.	This is contained in the section 9 <i>"Strategic delivery and core outputs"</i> under <i>"Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services"</i>
9	2.1 The Ocean Faces Multiple Challenges: Page 6: Non-UN entities should be removed from the chart (e.g. Arctic Council is not a UN body).	Removed
	2.3 Mobilization around the Concept of the 'Blue Economy': The UN FAO launched the "Blue Growth Initiative" in 2013, which focuses on capture fisheries, aquaculture, ecosystem services, and trade and social protection. UNEP should ensure any future work takes into account existing programs throughout the UN system such as these and does not duplicate their efforts or encroach upon their mandate. http://www.fao.org/policy-support/policy-themes/blue-growth/en/	
10	3. Transformational Leadership- the UN Environment Mandate: Suggest deleting this text (Page 8, 3rd paragraph): "Former Executive Director Achim Steiner commented upon his departure that he had a "deep sense of regret of not having been able to make UNEP part of putting a greater focus on the ocean and marine agenda. I think it was probably the biggest mistake I made..."	Removed

11	UN Environment Niche: Suggest this may be overstating the case (Page 9, 1st paragraph): “Indeed, UN Environment is often perceived as having a diminished role compared with other agencies and organizations both inside and outside the UN system particularly when it comes to ocean issues.”	Removed
12	Page 9, 2nd paragraph: We agree UNEP should ensure its work is integrated into cross-cutting conversations such as those happening in the BBNJ intergovernmental conference, but should be cautious not to get ahead of those negotiations, or pre-judge any outcomes	Reference to ABNJ/BBN removed. The Strategy focus primarily on national EEZs.
13	Page 9, 4th paragraph: “...coherent platform with four strategic work streams...” Please clarify the four work streams; are they reflected in 5.1, 5.2, etc?	Major overhaul of structural framework provided in revised strategy, incl. development of overall impact pathway, delivered through four ‘strategic objectives’ (these captures main elements of the ‘work streams’, but cast in a more logic and structure framework). See Section 5: ‘Theory of change’; 6: <i>Strategic objectives and core outputs</i> ’.
14	5.1.1 Supporting the regional networks of Marine Protected Areas: Suggest acknowledging UNEP is not the only organization that supports the development of regional MPA networks (LMEs, CEC, EU and others also involved).	The general language suggests the partnership approach in execution of the mandate.
15	It would be helpful to distinguish between regional networks of MPAs (which should include science-based information such as connectivity and representativeness) and regional networks of MPA managers, who focus on issues like management effectiveness.	Section 6.3 d) The proposed objectives and work sharpened to distinguish between ‘MPAs’ and ‘MPA managers’
16	5.2 Increasing Ambition in the Battle against Marine Pollution: UNEP is referring to applying the ‘reverse listing’ approach used for sea-based sources of pollution, such as in London Dumping to land-based sources. Most of the land-based pollution to the marine environment is due to a lack of capacity, infrastructure, etc. to address pollutant sources (especially solid waste, nutrients and wastewater). Moving towards banning these pollutants from entering the ocean is out of step with the reality of how this could be done. A better approach would be to recognize the key sources (as per the GPA priorities or all nine source categories) and determine how to continue to address them.	Removed this reference; this is more operational and indeed an option of the suite of recommendations that may be followed. This will warrant further implementation feasibility analysis. The approach to GPA and priority focus is captured in 6.2 ‘Build circularity in our economies and promote sustainable consumption and production approaches to address marine pollution and resource use’; <i>and section 7.3.3 Thematic Partnerships</i> . [NOTE also footnote 2 (page 20) regarding ongoing review of modalities of GPA]

17	Page 11, Paragraph 2: "...securing the aims of UN Environment's Clean Seas campaign..." Most member states are not part of this campaign and thus it is too narrow to list as a goal. A better goal would be on achieving reduction of key pollutant sources into the marine environment.	Referenced under section 8 ' <i>Communication and Education</i> '; and substantive elements under section 6.2
18	5.3 Ensuring Healthy Marine Ecosystems and the Protection of Marine Biodiversity: UNEP should be careful of directing the Convention on Biological Diversity's work areas.	Noted; refer to section 6.3. <i>Strategic Objective 3: 'Support Policies and Strategies Enabling Integrated Management and Sustainable Use of Marine and Coastal Ecosystem Services'</i> ; and Section 7 <i>Basis for Action, multilateral partnerships</i>
19	5.3: Bullets: Many of the projects under these bullets are unclear and do not distinguish how the work will be different from similar, existing efforts. UNEP should work to clarify these proposals and ensure any new activities take into account existing efforts. Specifically with regard to bullet four, we strongly encourage UNEP to focus on areas within its mandate. If a project related to fisheries is undertaken, UNEP should coordinate with FAO to ensure its complementary to ongoing efforts in fisheries.	Comments overall addressed in revised structure and impact pathway that has been developed, see section 5 and 6. On fisheries, re-formulations provided to clarify the evolving work and new MOU with FAO, see further section 6.2 c) and 6.3 e).
20	5.3.1 Addressing the Climate-Ocean Nexus: The reference to nature-based adaptation measures could be strengthened and expanded in chapter 5.3.1.	Topic expanded through Strategy, e.g. section 6.1 b) ' <i>Enhancing scenarios on ecological, socio-economic and climate-related drivers</i> '; and 6.3 c) ' <i>Nature-based climate change solutions supporting sustainable blue economies</i> '.
21	There could be a new paragraph related to building on the ocean observations of other organizations as a foundation for informed, science based management.	Addressed under sub-section 9.1 " <i>Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions</i> "
22	Would be useful to mention the World Meteorological Organization and UNFCCC. Also request clarifying that this is not duplicating the work of other organizations.	Addressed in section 7 <i>Basis for action, 7.3.1 Multilateral partnership</i> . Generally reduced highlighting of specific selected partners.
23	5.3.2 Ensure sustainable provision of ecosystem services by critical coastal and marine ecosystems: This section could include a component on communicating the value of coastal ecosystems and green infrastructure to policy-makers and government officials to demonstrate the financial benefits healthy and functioning coastal ecosystems can offer (through storm protection, resource harvesting and cultivation, tourism, etc.).	Section 4 <i>Strategy guiding principles</i> attempts to make the conceptual linkages that underpin the work in general, and further elaborated under the <i>Theory of Change</i> (section 5) and the strategic objectives that follow under section 6 (see specifically 6.1 a). The element of ' <i>communication of benefits</i> ' is considered a cross-cutting aspect for the strategy across work areas.
24	5.3.3 Addressing Fisheries Impacts on the Marine Environment: The first sentence makes an assertive and uncited claim about the impacts of	Reference removed

	fisheries and aquaculture. The rationale for this claim should be cited or it should be deleted.	
25	The UN FAO and its Committee on Fisheries is the global forum with competency over fisheries issues. As such, many of the areas outline in this paragraph are outside UNEPs mandate (e.g. trawling, bottom ecosystems, by-catch, regional fisheries bodies, fish stock assessments, and fisheries value chains and trade policy). UNEP should review its mandate and the decades of ongoing work the UN FAO, Regional Fisheries Management Organizations (RFMOs), as well as other places within and outside the UN system to address the environmental impacts of fisheries. When revising this work area, UNEP should avoid overlap with other UN agencies mandates, focus and clearly articulate any efforts related to fisheries, and revise focus on cooperating with those existing efforts, rather than conducting new work outside its mandate.	Clarity on potential for overlapping mandates offered in Section 6.3. <i>Strategic Objective 3: 'Support Policies and Strategies Enabling Integrated Management and Sustainable Use of Marine and Coastal Ecosystem Services'</i> , confining to areas of 'comparative advantage' and mandate. Specified collaborations and complementarities highlighted.
26	5.4 Sustainable Ocean financing – Investments for Healthy Marine and Coastal Ecosystems: UNEP should focus any business models for sustainable production and consumption on areas within its mandate.	Noted.
27	5.5 Science Policy Interface: Pleased to see this section introduce a science-based assessment/policy approach.	Noted; addressed through the strategy, e.g. Section 4 Guiding Principles, and in section 6.1 'Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions'
28	This section recognizes the World Ocean Assessment and UNEP's contributions to it, but suggest including similar recognition for the UN Decade of Ocean Science and confirm there is no overstepping of UNEP's mandate versus the mandates of other organizations like the IOC.	This is contained in the section 6 " <i>Strategic delivery and core outputs</i> " under " <i>Strategic Objective 1: 'Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions'</i> "
29	Annex 1: If the list of UN agencies, which is interesting not informative, is necessary, WHO and IHO should be included	Original Annex 1 removed
30	Annex 1: UNESCO-IOC: The IOC is currently coordinating the UN Decade on Ocean Science for Sustainable Development (2021-2030) designated by UN General Assembly resolution in 2016.	Original Annex 1 removed Role of UNESCO-IOC in coordinating UN Decade of Ocean science noted in section 7.3.1 'Multilateral partnerships'.
31	Annex 1: Correct the UNGA Assembly resolution year of adoption. It is 2017.	Original Annex 1 removed

32	<p>Annex 1: In Annex 1 the text concerning the FAO is inaccurate, most notably with regards to its role in supporting Regional Fisheries Management Organizations (RFMOs). Many RFMOs are independent, treaty-based bodies that are not associated with the FAO or UN system, though the FAO may attend as an observer and provide technical support if requested by an organization. In addition, many of the instruments adopted by the FAO are not agreements, but are rather non-binding instruments. Correct the description to the following:</p> <ul style="list-style-type: none"> ○ “FAO is the specialised UN agency leading international efforts on food security [add: works to promote][move: sustainable fisheries, particularly where international cooperation is required.] The FAO Fisheries and Aquaculture Department administers and supports [delete:44][add:10 statutory regional fisheries bodies (RFBs). In addition, it supports in a technical capacity] Regional Fisheries Management Organizations (RFMOs)[add:, which are independent, legally-binding, treaty based bodies, that manage fisheries around the world.] [delete everything following: and as such has a critical responsibility to achieve sustainable fisheries, particularly where international cooperation is required. There is a patchwork of fisheries management organizations covering all regions of the global ocean.] ○ Several important FAO [add: instruments and] agreements have been adopted to promote sustainable fishing practices. 	Original Annex 1 (Fragmented Ocean Governance) removed
<i>Finland (New 8 January version of Strategy)</i>		
1	<p>3. Mission. We see catalysing development of institutional frameworks more as a Member State driven process.</p> <p>It is good that UNEP strengthens the project and partnership cooperation. Anyhow, perhaps it would be more natural to UNEP to concentrate on the global level activities.</p>	<p>Noted.</p> <p>The global technical and normative role of UN Environment Programme to develop global knowledge, policy support and solutions is further elaborated, and how this also supports regional/national level policy-making, capacity support and pilot interventions, in turn feeding local experiences and dimensions back to a global level.</p>

2	5.1 aims to manage in an integrated manner human ACTIVITIES, uses and cumulative impacts at a scale that encompasses (its?) impacts on marine and coastal ecosystem function....	Language has been clarified (new Section 4.1)
3	The aim for EBM approach is welcomed but we note that it is a data and information driven approach which should, e.g. promote holistic integrated assessments of marine and coastal ecosystems as well as assessments of cumulative pressures and impacts.	Agreed, this key point is further reflected for example in new section 6.1 Strategic Objective 1: "Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions" and captured in input to UN Decade of Science (new section 7.3.1 Multilateral partnerships).
4	while taking into account management of freshwater ecosystems and terrestrial landscapes will be integrated .. comment: It's not clear what will be integrated	Intention is to apply an integrated coastal catchment approach, considering land-sea connections, processes and flows in integrated ecosystem assessment of drivers and valuation of environmental benefits/losses in more comprehensive policy-making and land-sea planning, applying e.g. 'ridge-to-reef' and 'source-to-sea' concepts.
5	5.5 Is it really UN Environment that "provides" SCIENTIFIC evidence or is it rather that UN Env promotes generation of scientific evidence and collates assessments and reviews? The actual data collection and experimentation is done elsewhere - connection to science organizations and academia is necessary.	Acknowledged, addressed for example in new section 4.5, emphasizing the 'application' of scientific evidence on policy-making, as well as new section 6.1: Establish knowledge-base', emphasizing the essential normative role to guide research and ecosystem assessments to address key policy- and management questions and information need.
	This paragraph only explains the science side but what about the policy side?	Acknowledged, the essential science-policy interface is expanded, including role of UN ENV to guide and support uptake of science-based knowledge in policy-making, planning and management.
Montenegro (Initial October 2018 draft version)		
1	Vision and structure: structure of document is missing; while vision needs to be clearly and visionary stated;	<p>Significant amendments made to the structure to gain the clarity as recommended. For example, impact pathway developed to achieve a clear overall vision and specific outcomes. New Sections 5: Theory of Change and 6: Strategic Objectives & Core Outputs identify problems/barriers, strategic objectives, activity areas and outcomes across sub-programmes towards medium- to longer-term impact by 2030.</p> <p>Also, five 'guiding principles' has been identified to realize this vision: adopting ecosystem-based management, source-to-sea approach, sustainable consumption & production, natural capital approach, strong science-policy interface.</p>

2	<p>Themes proposed in Ocean Strategy need to be harmonized with mandate of UN Environment (e.g. Within Blue Economy, UN Environment is responsible for environmental sustainability);</p> <p>Environmental Component of Ocean Strategy is superficially provided, and it requires further significant elaboration, in particular with regards to pollution reduction and remediation, monitoring and assessment of marine environment; without these components it is impossible to monitor progress related to improvement of a status of marine environment;</p>	<p>Noted. The Strategy is comprehensively revised to emphasise the environmental dimensions of UN Environs marine and coastal work, while also adopting an integrated approach to ocean and coastal sustainable development.</p>
3	<p>There is not elaboration of SDG targets, as a key cross horizontal strategic issues, within Ocean Strategy (more detailed suggestions are presented in the outline attached to this general opinion);</p>	<p>Now addressed</p>
4	<p>Action Plan of Regional Seas Convention is missing from Ocean Strategy, emphasizing coordinating role of UN Environment over Regional Sea Conventions;</p>	<p>Now captured</p>
	<p>Ocean Strategy needs to be based/interlinked with PoW and Budget of UN Environment; However, there is no reference to that point in this document.</p>	<p>Addressed new Section 7.2, “Addresses in new Section 7.2, “UN Environment Programme’s Framework that Guides the Strategy” and new Annex 1 and 2</p>
6	<p>A document need much further work to become a global, strategic document for UNEP. Missing elements include clear vision statement, clear added value of the document, clear added value of UNEP for developing such a strategy.</p> <p>Documents provides a lists already ongoing initiatives/UNEP policies with some indications what UNEP could done in relation to existing global processes/targets. In order to become a strategy it should go beyond this, setting additional strategic ambitions, other international relevant processes, being better structured, etc.</p>	<p>Acknowledged, please see comment above. Strategy has been fully revised, for example using a theory of change to provide a more strategic and outcome-oriented approach.</p>
7	<p>A reference to the 2030 Agenda, and SDGs and how the Strategy is going to support countries to achieve them is necessary.</p>	<p>Addressed</p>
8	<p>2. Vision and mission. Vision should be provided, independently of below listed long term goals.</p>	<p>Addressed, new section 3</p>

9	3.1 Prevent Pollution of the Marine Environment: Document needs to address also pollution reduction not only pollution prevention. Strategy needs to provide a detailed elaboration	Addressed for example in Section 6.2 “ Build circularity in our economies and promote sustainable consumption and production approaches to address marine pollution and resource use”.
	Sea- based pollution has to be properly reflected. SDG 14 puts an emphasize on land-based pollution; we may not omit transport and offshore activities that introduce significant pressures on marine environment (increasing pollution and seriously impacting marine biodiversity, including introduction of NIS)	Addressed in Section 6.2 a) “Sustainable consumption and production and source-to-sea solutions to address land-based and sea-based pollution”
	ML is addressed in 3.1.1; however, we have to reflect on nutrient pollution	Both ML and nutrients addressed in Section 6.2 a) “Sustainable consumption and production and source-to-sea solutions to address land-based and sea-based pollution”
10	3.2 Protect Marine Biodiversity: The aspect of ecosystem restoration seems to be missing from this chapter	Noted, restoration now included in Seciton 6.3 c) “Nature-based climate change solutions supporting sustainable blue economies”
	Coastal ecosystems are entirely excluded;	Acknowledged. Major structural changes made to Strategy to cover coastal issues and land-sea connections
	A reference to sustainable management and ICZM tools have to be provided;	Addressed in Section 6.3 b) ‘Integrated planning, decision-support and management of vulnerable ecosystems and ecosystem services’
	These proposals are in line with bellow listed SDG targets: <ul style="list-style-type: none"> By 2020, sustainably manage and protect marine and coastal ecosystems to avoid significant adverse impacts, including by strengthening their resilience, and take action for their restoration in order to achieve healthy and productive ocean. 	Acknowledged. A core operational principle for the strategy is taking an ecosystem-based approach, for example planning of marine protected areas within broader marine and coastal planning and management systems.
	This Strategic goal may be more in line with below copied SDG14 target that puts an emphasize on sustainable management of marine and coastal ecosystems; Protected areas should be prioritized but we have to keep on the integral and holistic approach.	

<p>Pay attention 3.2.1 provides more ambitious target that it is defined below; We should support it!</p> <ul style="list-style-type: none"> • By 2020, conserve at least 10 per cent of coastal and marine areas, consistent with national and international law and based on the best available scientific information 	<p>Noted. One ambition is to enhance management effectiveness of areas-based management measures.</p>
<p>Formulation of this strategic goal has to be more aligned with below copied target of SDG 14 (pay attention to blue highlighted text).</p> <ul style="list-style-type: none"> – By 2020, effectively regulate harvesting and end overfishing, illegal, unreported and unregulated fishing and destructive fishing practices and implement science-based management plans, in order to restore fish stocks in the shortest time feasible, at least to levels that can produce maximum sustainable yield as determined by their biological characteristics 	<p>Noted. This is partially addressed in section 6.3 e) ‘Measures mitigating environmental effects of fisheries on biodiversity and ecosystems’</p>
<p>Please pay attention, below copied target of SDG 14 is not reflected at all; we, as UNEP, need to further elaborate on economic instruments aimed at supporting sustainable fishery and preventing overfishing</p> <ul style="list-style-type: none"> – By 2020, prohibit certain forms of fisheries subsidies which contribute to overcapacity and overfishing, eliminate subsidies that contribute to illegal, unreported and unregulated fishing and refrain from introducing new such subsidies, recognizing that appropriate and effective special and differential treatment for developing and least developed countries should be an integral part of the World Trade Organization fisheries subsidies negotiation 	<p>Noted. This is addressed in section 6.2 c) ‘Trade and trade-related policies for environmental sustainability and resource efficiency’.</p>

	The same comment goes for small-scale artisan fisheries in relation to below copied target of SDG 14	Noted. See also comment above
	Provide access for small-scale artisanal fishers to marine resources and markets	Noted. Considered under 6.2 c)
11	<p>– Below listed targets are not reflected in this outline. For us as UNEP/MAP healthy marine and coastal ecosystems is of particular importance. It is integrated in the vision defined under IMAP, MSSD, as well as in MTS.</p> <ul style="list-style-type: none"> • By 2030, increase the economic benefits to Small Island developing States and least developed countries from the sustainable use of marine resources, including through sustainable management of fisheries, aquaculture and tourism • Increase scientific knowledge, develop research capacity and transfer marine technology, taking into account the Intergovernmental Oceanographic Commission Criteria and Guidelines on the Transfer of Marine Technology, in order to improve ocean health and to enhance the contribution of marine biodiversity to the development of developing countries, in particular small island developing States and least developed countries • Enhance the conservation and sustainable use of oceans and their resources by implementing international law as reflected in UNCLOS, which provides the legal framework for the conservation and sustainable use of oceans and their resources, as recalled in paragraph 158 of The Future We Want 	<p>Acknowledged.</p> <p>Ad 1: The revised Strategy provides a new framework / theory of change to enable sustainable blue economies, emphasising environmental, social and economics benefits, including for SIDS.</p> <p>Ad 2: Addressed throughout Strategy, for example Section 4 Guiding principles (science-policy interface); section 6.1 Establish knowledge-base on marine and coastal ecosystems to inform policies on human activities affecting their functions, and 7.3.1 Partnership for UN decade on Ocean Science.</p> <p>Ad 3: Captured in section 7.1 International frameworks guiding the Strategy.</p>

