

10 May 2019

Ministers for the Environment
UN Member States

By email

Honourable Minister

Re: Call to Action – Global Pact for the Environment

I write to you in my capacity as Secretary-General of the International Chamber of Commerce (ICC).

ICC is the world's largest business organisation with over 45 million members in over 100 countries. In our role as a Permanent Observer to the United Nations General Assembly – the only private sector organisation with such status – we are committed to representing business at the highest levels of international policymaking and leading international debate on the development of policy frameworks to enable and scale sustainable business practices.

There is no doubt that safeguarding our environment is one of the biggest imperatives of our time. Businesses of every size, geography and sector are already rising to the challenge and setting the pace through ambitious commitments and actions to reduce their environmental footprint, including through climate change mitigation and adaptation, and integrating sustainability into their core operations. This is the right thing to do ecologically, economically and socially, and it makes business sense.

The UN Secretary General's report on gaps in international environmental law and environment-related instruments – published late last year – reflects many important aspects of the fragmented nature of environmental law and environmental governance. The net result of such fragmentation is inconsistent content, uncertainties regarding the legal status of environmental law norms, and well-established deficiencies in implementing, complying with and enforcing them.

Since the report's release, discussions in the first and second sessions of the ad hoc open-ended working group on the development of a Global Pact for the Environment have recognised the need for robust action to address the current gaps in international environmental law governance, implementation and enforcement. It is also clear from these sessions that there are differing views on the specific nature of these challenges and the appropriate means by which to address them – and we commend member states for their efforts to reach consensus on these issues in recent months.

Within our global membership there remain differing views on the appropriate legal effect and degree of normativity of any future instrument. However, we do see universal support for enhancing environmental governance. If properly designed, a Global Pact for the Environment could play a valuable role in providing greater certainty and clarity as regards international environmental law. Any such instrument should also work in synergy with existing frameworks such as the Sustainable Development Goals, the Addis Ababa Action Agenda, and the Paris

Agreement in order to encourage long-term sustainable investments and responsible business conduct.

In this, ICC's centenary year, I am driven to consider what policy environments are necessary to help catalyse the private sector to be an agent of meaningful change and contributor to an inclusive and sustainable world for all over the next 100 years. Given the scale of the environmental challenges confronting us all, we need urgent, ambitious, and practical action. In that spirit, I call on all delegations to bring determination, courage and vigour to the third substantive session in Nairobi this May, to ensure we bring bold, forward-looking recommendations back to the General Assembly in New York and demonstrate political leadership for the environment.

We stand ready to assist you in these deliberations in any way possible in the months and weeks ahead.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'JWD', written in a cursive style.

John WH Denton AO
Secretary-General, International Chamber of Commerce

Cc: Permanent Representatives to the United Nations in New York
Majda Dabaghi, Director of Inclusive & Green Growth, International Chamber of Commerce
Andrew Wilson, Permanent Observer to the United Nations, International Chamber of Commerce
Raoul Renard, Government Affairs Manager, International Chamber of Commerce