

**Subcommittee meeting of the Committee of Permanent Representatives to the UNEP
(Nairobi, 24 March 2020)**

**Agenda item 2: Note by the Secretariat on the Contributions of the UN Environment
Assembly to the High-level Political Forum on Sustainable Development**

Comments by the European Union and its Member States

The EU and its MS would like to thank the honourable Chair for scheduling a meeting to discuss the input of UNEA to this year's HLPF.

Likewise, the EU and its MS wish to thank UNEP for submitting the first draft of the contribution of UNEA to the High-level Political Forum on Sustainable Development to be held from 7 to 16 July 2020 in New York.

The EU and its MS are of the view that the draft constitutes a good basis for discussion and have some substantive comments that we would like to see incorporated, along comments of other delegations, in an updated draft to be discussed by the subcommittee.

Due to the short time between the publication of the document and the deadline for submissions of comments, the following comments are of preliminary nature and the EU and its MS might come forth with additional comments at a later stage.

In general, we think that the key recommendations to the HLPF and in particular action points for the HLPF should be highlighted and listed in a short summary at the very beginning of the document.

Also, key policy recommendations and the successful initiatives of UNEP should be highlighted as a means to deliver on the ten points outlined in the political declaration adopted during the SDG Summit 2019.

The letter by the ECOSOC President specifically asked intergovernmental bodies to specify action points that the HLPF could address in its ministerial declaration in their respective inputs. While the draft outlines recommendations, the specific actions the HLPF could take are often not specified (so far explicit only in bullets 1 and 8 of section 3. Selected recommendations for accelerating progress). The EU and its MS suggest more prominent specification of recommendations given to the HLPF, in particular when it comes to potential action points under this section.

With respect to sustainable infrastructure, which is mentioned as a possible area for integrated policy approaches, the EU and its MS would suggest to strengthen the emphasis on the benefits of sustainable infrastructure as opposed to the detrimental effects of business as usual infrastructure planning on the SDGs and sustainable development in general. This should include explicitly naming the risk of sunk costs and long-term path dependencies initiated with currently unsustainable infrastructure decisions. This would help to more adequately stress the policy demand by UNEA – to move from traditional infrastructure planning to

sustainable infrastructure planning and counting valuing resilient ecosystems as “natural infrastructure”.

With respect to sustainable finance and business practices mentioned in section 1 (Key policies and measures, a) Enabling and increasing coordination and mainstreaming, indent 5), the EU and its MS would propose to slightly amend the framing to put less emphasis on the successful initiatives of UNEP and rather focus to a greater extent on substantive policy tasks and actions necessary to further promote a continued shift to sustainable finance.

The key policy b) Address the lack of environmental data, in section 1 could be summarized and more adequately describe the importance of environmental data for informed decision-making and policy making, as well as the need for harmonization, comparability of national, regional and global data. In this respect, the HLPF could be made aware of the Global data strategy UNEA-4 has agreed to and UN agencies could be encouraged to contribute. Furthermore, if highlighting that more than 30 per cent of the SDGs indicators do not have an agreed methodology, we should make use of the opportunity with this document to suggest how the HLPF could help advance this work, recognizing UNEP has a coordinating role.

Section 2 (Contribution of the intergovernmental body to accelerated action and transformative pathways), which refers to the description of the outcomes of UNEA 4, should be more focused. It should concisely but clearly mention the link between the UNEA resolutions and the subsequent actual work of UNEP. The theme of UNEA-5 (“*Strengthening Actions for Nature to Achieve the Sustainable Development Goals*”) could also be mentioned in this section to highlight the complementarity between HLPF and UNEA with regards to the environmental dimension of the SDGs.

Regarding the six recommendations for accelerated progress listed in section 3, the EU and its MS would suggest to outline more explicitly the actual recommendation(s) within each bullet, as well as to derive one concrete action point for the HLPF and its ministerial declaration, where this has not been done yet. Where topics under section 3 correspond to issues already outlined in section 1, it would be beneficial to ensure that the paragraphs in section 3 are more policy and action-oriented while corresponding paragraphs in section 1 can expand on the substantive context and underlying reasoning, so as to minimise duplication. Also, a clear reference should be made to how the identified actions relate to the ten areas of accelerated action identified in the SDG summit political declaration.

The EU and its MS would suggest that editorial improvements throughout the document be made, so as to help understand the intended messages which are not entirely clear in this form.

Examples:

- The key policy a) in section 1 which refers to coordination and mainstreaming seems to mix a variety of different concepts, ideas and levels of action that comes across somewhat convoluted in its current formulation. Coordination measures as well as horizontal and vertical coherence are not the same as the integrative substantive policy approaches listed thereafter.

- Indent 1 on nature-based solution (under section 1, a)) gives a list of areas that can fall under nature-based solutions, however, without linking it to the preceding definition of NBS and its strong focus on protection and sustainable use. Therefore, the given list might give the impression that certain sectors per se count as a nature-based solution (e.g. agriculture or forestry), which is not the case if qualifying criteria of sustainability are not taken into account.
 - In section 3 (selected recommendations), paragraph 3 it is not clear whether the last sentence stipulates focus areas for discussion at the regional level.
 - In addition, in section 1 c), we strongly suggest using the term „environmental human rights defender“ instead of the current formulation „people defending the environment“.
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