Swedish Society for Nature Conservation

Stockholm, Sweden, 11-05-2020

Dear Mr. Rotevatn and whom in the Secretariat it concerns,

Swedish Society for Nature Conservation (SSNC) is the largest environmental NGO in Sweden and its mission and activities covers many aspects of relevance to the work for sustainable development, in its three complementary dimensions (environmental, economic, and social). Furthermore, SSNC manages a Global Program in partnership with many organizations in low- and middle-income countries, and thereby engages in joint advocacy work in relation to Agenda 2030 on several different topics and levels. SSNC is accredited as observer to several United Nations fora and processes, including under United Nations Environment Programme (UNEP), United Nations Climate Change Convention (UNFCCC) and the United Nations Environment Assembly (UNEA). Upon request, we would like to share our thoughts on the two specific questions, and hope that you and the other Ministers can consider taking actions on them.

Important elements and key messages in the ministerial declaration

SSNC sees three key driving forces to the loss of biodiversity and accelerating climate change, and therefore recommends that they should all be addressed in the Ministerial Declaration:

1. Unsustainable and unjust management of natural resources

The latest Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report (2019)[1] shows that three-quarters of the land-based environment and about 66 per cent of the marine environment have been significantly altered by human actions. The five largest drivers of change are 1) changes in land and sea use, 2) direct exploitation of organisms, 3) climate change, 4) pollution and 5) invasive alien species. **The report also shows that on average trends in biodiversity loss have been less severe or avoided in areas held or managed by Indigenous Peoples and Local Communities (IPLCs).** Yet, insecure, contested, and unjust land, ocean, and forest tenure undermines efforts to protect, sustainably manage, and restore ecosystems essential to the realization of biodiversity and climate targets, as well as the Sustainable Development Goals (SDGs). According to the latest Global Biodiversity Outlook (GBO 4)[2] most Aichi biodiversity targets set for 2020 are likely to be missed. This will further undermine the progress of numerous SDG targets related to e.g. hunger, poverty, health, gender equality and climate.[3]

- The declaration should emphasize that the fundamental principles of participation, justice, and human rights must be integrated into conservation and "nature-based" solutions;

[1] IPBES report (https://ipbes.net/sites/default/files/2020-02/ipbes_global_assessment_report_summary_for_policymakers_en.pdf)

[2] Secretariat of the Convention on Biological Diversity (2014) Global Biodiversity Outlook 4 — Summary and Conclusions.Montréal, 20 pages. At https://www.cbd.int/gbo/gbo4/gbo4-summary-en.pdf.

[3] Roe, D., Seddon, N., & Elliott, J. (2019). Biodiversity loss is a development issue: A rapid review of evidence. Issue Paper, International Institute for Environment and Development (IIED), London, 798, 678-683.

- The rights to the lands, territories, and resources that IPLCs have traditionally owned, occupied or used should be recognized and emphasized in the declaration;
- The declaration should call for fair and equitable sharing to IPLCs of the benefits from activities related to their lands, territories and resources.

2. Unsustainable production and consumption cultures

The Global Resources Outlook 2019 highlights the fact that resource extraction and the processing of materials, fuels and food account for more than 90 per cent of global biodiversity and water stress impacts, and approximately half of global greenhouse gas emissions (not including climate impacts related to land use)[4]. Access to goods and services is unequal. While many people have very high levels of consumption, and many more strive to join that lifestyle, others struggle to fulfil the most basic needs. And while overconsumption is an attribute of mainly high-income countries, its consequences in the form of climate change and environmental degradation tend to impact low-income countries the most. Global sustainable consumption cultures need to be established, where all individual consumers as well as public actors have the will, knowledge and means to consume goods and services that enable a good life. **Circularity and novel ways of thinking around production, ownership and consumption are then necessary to explore.** In doing so, the perspectives and capabilities of both low-, middle- and high-income contexts are essential to take into account. SDG 12 can help lower-income countries avoid getting locked in unsustainable lifestyles, and instead leapfrog communities to more resource efficient and sustainable consumption cultures.

One crucial aspect of sustainable production and consumption is the sound management of chemicals and waste. According to the GBO 3, pollution is one of the five principal threats to biodiversity, and a conclusion in the GBO 4 is that little progress has been made for Aichi Target 8:1 (pollution and biodiversity) and that efforts need to increase substantially.[5,6] **The issues of chemicals and waste cross-cut the Agenda 2030, but have no specific SDGs, which is part of the explanation why chemicals and waste often do not get the attention that they need on the political agenda.** This needs to be urgently addressed. **Circular economy can be a key strategy to address a number of targets to the SDGs, and is a key feature of sustainable production and consumption cultures.** It can lower the need for virgin raw materials, and consequently the need for processing chemicals, water and energy in extractive, refining and manufacturing processes, as well as be part of waste management strategies and create new jobs. Systematic identification and substitution of hazardous chemicals in material flows, however, is a prerequisite for circular economy that is safe to human health and the environment.

Further, **agroecological and organic farming production systems offer solutions to substitute highly hazardous pesticides and lower the need for artificial fertilizers. They offer solutions to addressing multiple goals and targets in the Agenda 2030, including reducing the climate impact, promoting the water retention capacity of soils, and the biodiversity on the farm.**

[4] Global Resources Outlook 2019 (https://www.resourcepanel.org/file/1172/download?token=muaePxOQ).

[5] Global Biodiversity Outlook 3 (https://www.cbd.int/doc/publications/gbo/gbo3-final-en.pdf).

[6] Global Biodiversity Outlook 4 (https://www.cbd.int/gbo/gbo4/publication/gbo4-en-hr.pdf).

Another important food sector is fisheries. However, the use of unsustainable fishing methods and overexploitation has resulted in severe declines in fish stocks; the latter is ranked as the largest driver for biodiversity loss in the oceans. At the same time fisheries contribute significantly to food security and poverty eradication for millions of people, especially in low-income countries. **Transformation to fair, equitable and low-impact fishing is therefore key to help tackle climate change, biodiversity loss, and to reach several of the SDGs, including poverty and hunger.** In terrestrial systems, the single most important driver for biodiversity loss is land-use change. **The alarming deforestation rate and conversion of land must be halted through effective land use planning and securing of tenure.**

Access to energy is fundamental to meet people's basic consumption needs, as well as the needs of most production systems. Nearly a billion people – mostly concentrated in Sub-Saharan Africa and South Asia – still live without access to electricity, and hundreds of millions more with unreliable or expensive, unaffordable electricity.[7] This is a major challenge for climate change. To limit global warming to 1.5°C is key in order meet many of the SDFGs and requires actions on all levels. **A rapid transformation of the energy sector, from fossil fuels to renewable energy, is needed. This transformation must be a just transformation[8], with a life-cycle perspective on the fuels, energy sources and technologies involved**.

- The Ministerial Declaration should emphasize that the UN consumer guideline on consumer protection, recognizing the need to ensure consumer protection from hazards to health and safety, are an intrinsic part of establishing sustainable consumption patterns. Transparency, reliable information and consumers' right to participation in development need to be recognized and is central to achieving sustainability;
- Novel consumption cultures must be strongly encouraged in the declaration. One way of improving people's access to goods and services without increasing the stress on the planet is to share or lease. Sharing and leasing are concrete examples of a more sustainable consumption culture that reduces waste and improves resource efficiency. In addition, the sharing and leasing economy enables development and innovative entrepreneurship;
- The need to address the structural barriers to sustainability should be highlighted in the declaration. Sustainable consumption policies and initiatives should recognize the need to address overlapping inequalities between and among societies and genders. By recognizing the central role of participation in achieving sustainability, it should recognize the importance of democratized policy formulation, decision-making and implementation;

[7] World Bank report (https://www.worldbank.org/en/news/feature/2018/04/18/access-energy-sustainable-development-goal-7)

[8] "Just transition" is a framework endorsed internationally by the ILO to encompass a range of social interventions needed to secure people's livelihoods when economies are shifting to sustainable production, including climate change mitigation, protecting biodiversity and ending conflict ("Guidelines on a Just Transition towards environmentally-sustainable economies and societies for all", 2015). The Paris Climate Agreement also contains references to a Just Transition, where governments commit to ensure that workers are accompanied in the transformation through the creation of decent work opportunities.

- To elevate sound management of chemicals of waste on the global political agenda, and highlight its cross-cutting importance in the Agenda 2030, the declaration should call for an Enabling Framework for Chemicals and Waste, which would support long-term efficient governance of chemicals and waste at all levels, from local to global;
- The importance of circular economy as a key strategy in the work with Agenda 2030 must be highlighted, but at the same time it is necessary to stress that a prerequisite for it to be safe to human health and the environment is the systematic identification and elimination of hazardous chemicals at source from the material flows, which requires transparency of the identity and presence of hazardous chemicals in materials and constituent components of products, sharing of this information in the supply chains, and systematic substitution work. Globally harmonized criteria for Chemicals of Global Concern, as currently under discussion in the SAICM post 2020 process would be helpful in that regard;
- It should also be stressed in the declaration that work with current Issues of Concern (IoCs) in SAICM must be continued under its successor, and ambitions increased, which in some cases may necessitate to explore possibilities to elevate the ambition level in the IoC work in fora beyond the voluntary strategy. The latter is relevant to Chemicals of Global Concern in international supply chains for products and their constituent components, which are key to address to promote a safe circular economy;
- Efforts to transform agricultural production into production systems based on agroecology and organic production, taking into account local socio-economic benefits and sustainability, should be promoted in the declaration;
- Implementation of the FAO Voluntary Guidelines for Securing Sustainable Small Scales Fisheries in the Context of Food Security and Poverty Eradication should be strongly encouraged;[9]
- Implementation of the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security should also be strongly encouraged.[10] Addressing land-use change is essential to halt deforestation and fragmentation of natural ecosystems;
- The declaration needs to call for increased efforts for a just transition of the energy sector to renewable energy, and approaching the transition from a life cycle perspective, so that the solutions are long-term sustainable from and environmental and socio-economic standpoint.

3. Unstainable financial flows

The private sector has an important role in striving for just transition**. Investments should be made in research, innovation and realization of business models that promote safe circular economy and similar resource saving solutions, agroecology and organic farming, low impact fisheries, infrastructure,**

[9] FAO Voluntary Guidelines for Securing Sustainable Small Scales Fisheries in the Context of Food Security and Poverty Eradication (http://www.fao.org/voluntary-guidelines-small-scale-fisheries/en/)

[10] FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (http://www.fao.org/3/a-i2801e.pdf)

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procurement models that promote sustainable practices/products, green chemistry[11,12,13], renewable energy production technologies, energy carriers and storage technologies, with a full life cycle perspective and the aim to integrate energy systems into a circular economy.

- The Ministerial Declaration should stress that unsustainable financial flows must be phased out and immediately redirected to a sustainable and just transition, which entails moving them from fossil fuels, harmful subsidies, environmentally damaging sectors, to instead support investments in low impact fisheries and aquaculture, safe circular economy, agroecology and organic farming, procurement models that promote sustainable practices/products, green chemistry, renewable energy production technologies, energy carriers and storage technologies.

How can the Environment Assembly make a significant contribution to Strengthening Actions for Nature to achieve the Sustainable Development Goals at a global scale?

Declarations and resolutions adopted by UNEA are vital in guiding the work in multilateral environmental agreements ahead. Consequently, in preparation of meetings, UNEA must carefully analyze the current challenges in all ongoing environmental multilateral policy processes, so that the respective Secretariats can be supported by mandates from the declarations and resolutions in the best possible way. Holistic thinking is key to understand how decisions and associated mandates affect the work across multiple policy processes and how synergies can be reached.

For 2021, specifically, SSNC hopes that the UNEA5 Ministerial Declaration and resolutions will clearly support elevated ambitions in the work with the Convention on Biological Diversity (CBD) Post 2020 Framework, the process related to marine biodiversity in Areas Beyond National Jurisdiction (ABNJ), as well as the SAICM post 2020 process, including for the work with the IoCs and discussions about the Enabling Framework, so that we have the best possible conditions in place for a good outcome of the fifth International Conference on Chemicals Management (ICCM 5).

With best wishes,

Karin Lexén
Secretary General
Swedish Society for Nature Conservation

[11] Anastas, P.T, and Warner, J.C, 1998. Green Chemistry: Theory and Practice, Oxford University Press, 30 pp.
[12] Anastas, P.R., and Eghbali, N., 2009: Green Chemistry: Principles and Practice, Chemical Society Reviews 39, 301-312.
[13] 12 principles of Green Chemistry (https://www.acs.org/content/acs/en/greenchemistry/principles/12-principles-of-green-chemistry.html).