

**Subcommittee meeting of the Committee of Permanent Representatives to the UNEP  
(Nairobi, 14 July 2020)**

**Agenda Item 2: UNEP Mid-Term Strategy narrative and budget approach**

**Background document 1:**

**UNEP/SC/2020/10/2 of 2 July 2020 on the narrative for UNEP's MTS 2022-2025**

**Background document 2:**

**UNEP/SC/2020/10/3 of 2 July 2020 on the PoWB envelope options for 2022-2023**

**Comments by the European Union and its Member States**

- The EU and its MS would like to thank UNEP for preparing the draft narrative for the MTS 2022-2025 as well as providing three general envelope options for the 2022-2023 PoWB.

**On the narrative for UNEP's MTS 2022-2025**

The current draft narrative forms a balanced document and good basis for further work, and the EU and its MS wish to highlight a number of positive points:

- We support the overall ambition and priorities outlined by UNEP in the draft narrative 2022-2025 and thank UNEP for incorporating many of the views and ideas expressed in the MTS Discovery sessions in May and June 2020.
- The EU and its MS welcome the focus of the MTS narrative on addressing the three key challenges climate change, nature loss and pollution by drawing on SCP as a major lens, as well as the three strategic pillars derived thereof. The issues underlying the three pillars are closely interlinked and therefore it will be crucial to strive for coherence and cater to such interlinkages when the MTS is translated into action at the programmatic level.
- The EU and its MS agree with the situation analysis enshrined within the narrative and in particular with the assessment that environmental crises have to be addressed if the international community is to succeed in eradicating poverty, protecting people and ensuring sustainable development.
- The EU and its MS welcome the emphasis by UNEP on transformative change and strongly support an MTS with this as an underlying narrative. We would welcome continued dialogue on how this can be achieved in practice, and consider it important to strengthen the language on this in the text on the pillars and thematic programs.
- The EU and its MS welcome the centrality of the 2030 Agenda for Sustainable Development and linkages thereto throughout the narrative, its explicit aim of contributing to the decade of action and delivery, as well as the recognition to strengthen work on human rights and gender as a key elements for achieving sustainable development and gender mainstreaming throughout the document.

- Much in line with the current MTS (e.g. outcome maps), the EU and its MS would welcome a transparent and systematic alignment with, as well as communication of the contributions to the SDGs. In this context, the EU+MS welcome the intent to utilise or reference SDG indicators where possible.
- On the question of indicators, the EU and its MS welcome UNEP's proposals to develop indicators for measuring progress along the lines of "three levels of results" (where UNEP has a direct role, provides enabling support for an outcome or has an influence yet still contributes) and believe this would lead to an improvement in measuring results both in terms of output and outcome in the longer term.
- The EU and its MS are also encouraged by the narrative's recognition of the importance of UN system reform and the intent of UNEP to leverage it as an opportunity to increase impact, which will be central to delivering on its mandate. We encourage UNEP to continue and strengthen further the efforts already begun in this field. Reflections on this could also be more clearly included in the text on the pillars and thematic programs.
- In particular, the EU and its MS support UNEP's intent to improve participation in and better leverage inter-agency mechanisms beyond the EMG to strengthen the environment within the UN, an area in which UNEP can and should improve. We also welcome the mentioning of EMG as an important element and would also encourage a reference to the work of Sustainable UN where UNEP has a coordinating role and which involves the whole UN system.
- The EU and its MS welcome and encourage the continued focus on strengthening partnerships with other UN agencies as we believe this is key in implementing all dimensions of the 2030 Agenda.
- Likewise, the focus on an efforts to strengthen UNEP's cooperation with MEAs are also very welcome from the perspective of the EU and its MS, as well as the overall emphasis on the engagement of the private sector and collaboration with the financial sector throughout the narrative. In this context, we would welcome a strengthened engagement from UNEP to increase visibility, transparency and accountability of non-state actor commitments and actions.
- Furthermore, the EU and its MS welcome that the plethora of programme evaluations and experiences with past MTS / PoW have and will inform the MTS development as well as the commitment to continuous strengthening of results-based management, which should be an important priority so as to continuously increase the quality, effectiveness and efficiency of delivery.
- Lastly, the EU and its MS also welcome that UNEP will continue its efforts towards digital transformation in line with the Secretary-General's Roadmap for Digital Cooperation and wish to emphasise the importance of applying a human rights perspective to this work.

At the same time we see room for improvement on a number of issues:

- In general, the EU and its MS would like encourage a stronger focus on the nexus and synergies between climate and other environment issues, such as the ocean – climate nexus.
- With respect to the important mention of many relevant stakeholder groups throughout the narrative, the reference to the subnational level and its stakeholders could be strengthened. It is the view of the EU and its MS, that the section on the comparative advantages of UNEP could be strengthened further, in order to do justice to the capabilities and important role of the organisation and recognise the achievements UNEP played in moving forward the international environmental governance.

- With respect to the strategic pillar 1 (“Climate stability”), the EU and its MS welcome that UNEP aims to support MS with both mitigation and adaptation strategies. However, in line with the Paris Agreement and the collective commitment of all countries to move towards GHG-neutrality and enhance their resilience, the EU and its MS are of the view that the focus of UNEP’s work on either mitigation or adaptation should not be exclusively limited to certain groups of countries. Rather, efforts need to be undertaken to accelerate mitigation as well as adaptation action in all MS requiring support if we are to limit global heating to 1.5°C. This would need to also be reflected accordingly under strategic action 2 of the thematic programme on climate action.
- Furthermore, it would be useful to describe more clearly UNEP’s strengths compared to other organizations working on climate issues as well as to mention UNEP’s key partners in this regard.
- In addition the EU and its MS would prefer that the narrative would explicitly reference renewable energy and energy efficiency instead of speaking of clean energy innovations.
- However, instead of focusing on country-driven and country-determined tools for a sustainable energy transition, the EU and its MS would recommend UNEP to focus on exploring best case examples and providing an informative kit on possible scenarios, including the benefits and draw-backs for each, for a sustainable and just energy transition.
- The EU and its MS would welcome if UNEP focused on the possibilities of the different paths to achieve climate neutrality as it is stipulated in the Paris Agreement. Energy sector carbon neutrality constitutes only a part of the overall transformation to climate neutrality by 2050 and there is value added of exploring and adding different sectors.
- With respect to strategic pillar 2 (“Living in harmony with nature”), the EU and its MS would welcome a reference to partnerships as well.
- Regarding strategic pillar 3 (“A pollution-free planet”), the EU and its MS are of the view that the concepts of ‘sustainable consumption and production’ and ‘circular economy’ should be included. Furthermore, innovations of non-chemical alternatives and sustainable chemistry should also be areas for UNEP to work on. Raising consumer awareness and promoting behavioural change towards more sustainable consumption will be essential to promote the latter.
- UNEP has formulated several milestones per pillar, which we support. However these milestones seem to have in many cases an “open-ended” character and would benefit from more focus and connection with a clear timeline.
- Under the thematic programme on climate action, the EU and its MS would welcome a reference to ambition raising, potentially under strategic action 2, since UNEP is well placed to support in the context of NDCs, long-term strategies and development planning. At the same time, a stronger emphasis on the effective implementation of NDCs, LTS could be introduced in the text.
- In addition, the EU and its MS suggest to emphasise that the solutions to be promoted under action area 2 should be *sustainable* solutions.
- Under the thematic programme on chemicals and pollution action, the EU and its MS would welcome the inclusion of important elements that had been part of previous MTS and remain important challenges, such as for example the importance to support countries in implementing cross-sectoral national chemical management regimes as well as an integrated approach to financing sound management of chemicals and waste (e.g. under action area 2 and 3).
- In line with the narrative’s aim to leverage inter-agency cooperation and partnerships, it will be essential to better leverage the Inter-Organization Programme for the Sound

Management of Chemicals and Waste (IOMC) for coherent support, which could be outlined under action area 3.

- In addition, the EU and its MS would welcome if SAICM and its successor framework beyond 2020 could be explicitly mentioned under action area 6.
- With regard to the thematic programme on nature action, the EU and its MS would like to emphasise the need to speak of sustainable and *resilient* food systems.
- With respect to the enabling programme on finance and economic transformations and the broad scope of potential engagement areas for sustainable finance outlined in action area 1 therein, the EU and its MS would encourage UNEP to focus its work in this regard, ideally on areas promising high impact and where the organisation has a comparative advantage. The dimension of finance should also inform UNEP's support to MS on mitigation and adaptation action at country-level, for example on green finance strategies.
- On action area 4 of the same enabling programme, the EU and its MS would welcome a stronger reference to the local and regional level, with a particular focus on local administrations and subnational governments and their essential role for implementation.
- The document states quite clearly that rising socio-economic inequality and inequity has been deepening divisions between and within countries and the 2030 Agenda reflects that depletion of natural capital, climate vulnerability and growing resource demands disproportionately affect the livelihoods and well-being of the poor. The MTS narrative reflects this well in its analysis. However, the EU and its MS feel that this linkage between environmental challenges in relation to poverty eradication could be developed further in the section on UNEP's programmes (section 6).
- Regarding several sections in the document where the provision of information, data and knowledge sharing are touched upon (e.g. action 1 under chemicals and pollution action; action 2 under science-policy), the EU and its MS wish to emphasise the importance to make use of existing data collections, data platforms and data exchange protocols.
- On a minor side note, the EU and its MS would encourage UNEP to rethink some of the terminology employed for some of the strategic pillars and programmes with a view to ensuring communicability to laypersons. For example, "climate stability" might be misunderstood as understating the urgency of action and could perhaps – along the lines of the other forward-looking pillar titles – go in the direction of "A decarbonized and resilient world". Another example would be the choice of "chemical and pollution action", through which it does not become clear that action is aimed at addressing pollution.

### **On the PoWB envelope options for 2022-2023**

- The EU and its MS agree with the assessment outlined by the Secretariat in its note that we have arrived at a critical moment in time considering the deterioration of health of ecosystems worldwide, unabated climate change and biodiversity loss, which clearly signal that we are already exceeding planetary boundaries.
- We have to seize this moment if we wish to successfully achieve our common ambition and the commitments enshrined in the 2030 Agenda for Sustainable Development and the conjoint of MEAs, in particular the Paris Agreement as well as under the CBD and UNCCD, to name just a few. We need to increase and accelerate implementation and push even stronger for the necessary transition of our economies and societies towards sustainable and inclusive development.
- UNEP has to play a critical catalysing role in this endeavour and needs to be in a position to be able to effectively support Member States in such a transition.

- However, at the same time, the EU and its MS are cognizant of the mid- to long-term risks of the ongoing coronavirus pandemic, particularly with respect to the effects of the economic recession on public budgets and expenditures as well as the uncertainty regarding the future progression of the pandemic.
  - Therefore, the EU and its MS would, as a preliminary and tentative indication, suggest that UNEP bases its PoWB planning on envelope option C.
  - Against this backdrop, the EU and its MS encourage UNEP to draft the PoWB in a way that safeguards the flexibility to react to potential budget shortfalls and will ensure that core mandates and key activities essential to the attainment of the key indicators of the MTS and PoW will be implemented. In addition, UNEP should, when developing its PoWB, allocate sufficient core resources towards activities necessary to provide a strong science foundation, to activities that accelerate learning (such as MRV, evaluation, etc.) and to uphold its commitments to engage fully in the UN reform, so UNEP can “strengthen its voice” through UN resident coordinators and country teams.
  - At the same time the EU and its MS encourage UNEP to continuously focus on resource mobilization and wish to inquire whether the resource mobilization strategy will be updated in the future?
  - The EU and its MS remain concerned about the persisting gap in the Environment Fund. With only half of all MS contributing to the Environment Fund and only a quarter doing so in line with or going beyond the voluntary indicative scale of contributions, we fall short of our joint commitment to strengthen UNEP by – amongst others – providing voluntary financial resources that would correspond to the universal membership in this organization. The EU and its MS invite all MS to contribute to the Environment Fund in line with their national capabilities.
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