



**United Nations
Environment Assembly of
the United Nations
Environment Programme**

**Annual subcommittee meeting of the Committee
of Permanent Representatives
to the United Nations Environment Programme
Seventh meeting**

Nairobi, 12-16 October 2020

Online

1.00 pm – 6.00 pm (GMT+3)

**Agenda Item 4: Consideration of a draft UNEP Medium-Term Strategy 2022-2025
and Programme of Work 2022-2023**

This note, entitled “Comments received by the 151st Committee of Permanent Representatives,” serves as one of four supporting documents for agenda item 4, “Consideration of a draft UNEP Medium-Term Strategy 2022-2025 and Programme of Work 2022-2023.”

It provides a comprehensive summary of the guidance received from member States at the 151st meeting of the CPR on the Draft UNEP Medium-Term Strategy 2022-2025 and Programme of Work 2022-2023, including comments received in writing up to 21 September.

The Secretariat will address these comments in the final iteration of the draft MTS, in addition to incorporating any guidance that may be received during the 7th Annual Subcommittee meeting of the CPR.

UNEP's Draft Medium-Term Strategy 2022-2025

Comments received by the 151st Committee of Permanent Representatives

General comments

- Better underline UNEP's ability to assist Members States, including developing countries and most vulnerable countries (e.g., Least Developed Countries and African countries based on their contexts), in the implementation of their national environmental policies and international agreed-upon commitments, especially the 2030 Agenda for Sustainable Development.
- Revisit references to language that are not internationally agreed.
- Better underline UNEP's comparative advantage, particularly in relation to its climate and biodiversity work, as well as UNEP's cooperation with other entities (e.g., other UN entities, and Multilateral Environmental Agreements) to create bigger impact, including through leveraging the UN Reform.
- Increase focus on issues related to equity and poverty eradication, where appropriate.
- Appreciate stronger references to gender goals; these should also be translated into appropriate results in the Programme of Work.

Section-specific comments

Lessons learned

- Emphasize UNEP's takeaways from the current Resource Mobilization Strategy and what can be improved in its next iteration.

A Medium-term Strategy for the Decade of Action

- Further emphasize the importance of the environmental dimension of the SDGs as a foundational and enabling factor to achieve the aspirations of the 2030 Agenda.
- Further emphasize UNEP's role in disaster-related contexts, particularly from an adaptation perspective.

Climate Action

- Ensure complementarity with and support to the UNFCCC process, the Paris Agreement and other MEAs, as appropriate.
- Clarify whether "high emitting countries" should be understood in absolute, per capita or perhaps both terms.
- Revisit some of the terminology employed under this subprogramme with a view to ensuring alignment with the UNFCCC language.
- Provide more emphasis on adaptation and resilience, alongside means of implementation, and better define linkages with national climate action, i.e., NDCs.
- Ensure adequate focus on vulnerable countries, i.e., LDCs.

Nature Action

- Ensure complementarity with and support to the CBD process, including the post-2020 Global Biodiversity Framework, and the MEAs, including regional MEAs.
- Highlight UNEP's role in restoration under the 2025 strategic objectives of the subprogramme.
- Better underline UNEP's related work on water, especially freshwater, as well as UNEP's role of custodian of SDG indicator 6.5.1.

Chemical and Pollution Action

- Ensure complementarity with and support to the post-2020 framework on Chemicals and Waste.
- Better incorporate chemicals and waste in the overall narrative of Sustainable Consumption and Production, Circular Economy and Resource Efficiency.
- More ambition would be appreciated with regard to the actions under SDG 12.4, specifically relating to chemicals, which should be SMART (Specific, Measurable, Achievable, Realistic and Time-bound).
- The document only refers to the SDG indicator 12.4.2, which deals with hazardous waste, SDG indicator 12.4.1 (number of parties to MEAs on hazardous waste and chemicals) should also be included.
- Clarify whether there is a UN position on extending SDG target 12.4 beyond 2020, or whether a better target would be more appropriate for referencing, including with respect to current negotiations around the post-2020 Framework on Chemicals and Waste
- Welcome the inclusion of important elements that had been part of the 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.
- Ensure appropriate leveraging of the Inter-Organization Programme for the Sound Management of Chemicals and Waste (IOMC), as appropriate, for coherent support.

Science-Policy

- Emphasize that the scientific data provided under science-policy foundational subprogramme relies on credible resources.
- Better clarify UNEP's role alongside other international science-policy interfaces (including IPCC and IPBES) and explain how UNEP intends to 'bring together' the different scientific assessments from various sources as well as support the different bodies involved to provide more coherent messaging.
- Welcome further detail on the 'Global Environment Assessment Dialogue'.
- Would welcome more detail in terms of UNEP's focus and how that will make a difference, including through synergizing with other international scientific bodies.

- Underline the important function of horizon scanning (e.g., bolden text where relevant and as appropriate).
- UNEP’s role in “Building the capacities of countries to collect, analyze their own relevant data and conduct their own environmental assessments, and guiding them towards embedding these in their policies and decisions that drive actions on climate change, biodiversity loss and pollution, will be key aspects of UNEP’s intervention” could be better placed, not only in the context of environmental data, but is also relevant in view of the other elements mentioned on environmental knowledge, coherence and keeping the environment under review.
- Clarify how UNEP will ensure that sound science backs all financial transformations (e.g., what mechanisms are there in place to achieve this?).

Environmental Governance

- Suggestion to include “and Law” in the title.
- Revisit the language on environmental rights, as appropriate.
- Emphasize UNEP’s approach to policy framework and institutional capacity building – in addition to UNEP’s work related to legislation.

Finance and Economic Transformations

- Further stress the importance of emphasis on the cross-cutting issues of Sustainable Consumption and Production, Circular Economy and Resource Efficiency. While the general narrative on these issues is well addressed, it could be better reflected in the operational parts of the MTS and through more concrete objectives in the outcomes.
- SCP is to some extent included in the “Finance and Economic Chapter” of the MTS. While the production angle of SCP is embedded well in the chapter, the topic would merit a more explicit placing of the consumption angle on SCP into the strategy.
- A call for continuation of the 10YFP beyond 2022 should be included.

Digital Transformations

- Welcome more reference, as appropriate, to the digital divide and how UNEP can contribute to closing the digital gap, including through integrating socially relevant, innovative practices for the environment.

Four Levers of Change for Better Delivery

Raising environmental ambition within the UN System through UN Reform

- Revisit references to UNEP’s involvement in the Security Council’s activities, including peace operations, which should occur upon invitation or mandate by the Council itself.
- Strengthen references to UNEP’s regional work / regional Offices, as appropriate.
- Provide more reference to UNEP’s challenges in response to the Reform, as appropriate.

Innovative communication as a driving force for empowered environmental advocacy

- Better underline UNEP’s role in environmental communication, education and awareness raising.

List of Members of the CPR and Major Groups and Stakeholders that provided comments:

- Algeria
- Brazil
- Canada
- China
- Colombia
- Costa Rica
- Egypt
- Ethiopia
- European Union and its Member States
- Mexico (on behalf of GRULAC)
- Norway
- Palestine (on behalf of G77 and China)
- South Africa
- Switzerland
- Sweden
- United Kingdom
- United States of America
- Working Group on Just Transition