

Comments to Medium-Term Strategy 2022-2025 and Programme of Work 2022-2023

Medium-Term Strategy

Overarching comments:

While the references to 2025 make sense in terms of the period covered by the strategy, these may not always be realistic and also provide no clarity on how UNEP will be able to respond when other fora operate on other timelines on particular issues.

Background (pp. 3- 4)

1. First paragraph, p.4: "...and that global environmental governance continues to inform sustainable law and policymaking under the direction set by the multilateral environmental agreements."

Comment: Not all environmental issues are addressed by MEAs. This also does not take into account emerging issues, a key component of UNEP's mandate. In addition, which organ is better placed than UNEP to speak to cross-cutting issues or to highlight interlinked issues which do not easily fall within the ambit of a single agreement. Such issues can benefit from UNEP's convening power of various environmental organs.

Situation analysis (pp. 4-10)

Norway welcomes the analysis in this section, and in particular the identification of the global megatrends. This analysis is well substantiated. However, in a situation with many international and multilateral actors, we would appreciate if the text could more explicitly highlight the particular competencies, role and value-added which UNEP has in respect of responding to this analysis.

Lessons learned (pp. 11-13)

The MTS articulates that UNEP can contribute to UN system-wide coherence and leverage UN reform. However, the strategy does not provide sufficient detail as to how UNEP will contribute to coherence nor is there any discussion of challenges in this respect. We would also like to know how you will measure progress and results on this.

Norway also appreciates the honest reflections on weak gender equality and human rights outcomes at project level. We note that UNEP aims to strengthen this in the new MTS by moving beyond a focus on project design to implementation, project evaluation and feedback loops. Although gender equality and a rights-based approach is reflected in the MTS, this could be further strengthened by indicating how these will be integrated into the work at sub-programme level.

MTS for Decade of Action (pp. 13-16)

The overall strategy of the MTS is stronger and clearer than the existing MTS. However, it would be helpful to get more information on how UNEP is rationalizing its work given the encouragement by member states to further prioritize its work.

The MTS articulates that adaptation action will focus on countries that suffer the greatest from disasters and conflicts, as well as LDCs and SIDs. This is very important to follow up as a

recent review of ODA-financing found that there is no correlation between the amount of money received for climate change adaptation and disaster reduction. This leaves affected populations vulnerable to extreme poverty and climate change. How can UNEP contribute to close this gap?

UNEP's focus (pp. 16-18)

Norway believes UNEP should consider developing an overall theory of change for the three strategic objectives that will better link the thematic sub-programmes together. If not, UNEP should as a minimum identify co-benefits between the three thematic sub-programs more explicitly and include this in the results framework for the Programme of Work.

Stimulating actions on climate change, nature and pollution also requires challenging status quo, vested interests and social norms. How can this be better reflected in the MTS?

In respect of the three-pronged approach (p. 17), it is unclear to understand what UNEP has in mind when in point 3, reference is made to *reinventing governance and norms*. It is not obvious where UNEP picks this up in the rest of the document and what actions specifically are taken to implement this.

Thematic sub-programme 1: climate action (pp. 18-22)

While the goals on p. 19 are admirable, they are ambitious. It is very hard to see how UNEP can realistically contribute to such targets. Norway welcomes the emphasis on the Paris Agreement. Norway welcomes the prioritization by UNEP of the implementation of the Kigali amendment to the Montreal Protocol or on adaptation, but this is not entirely clear to us from the description of this sub-programme in the MTS. We also struggle to place the emphasis in outcome 2 on the Enhanced Transparency Framework in the context of the highly populated field of actors in this area. We would expect particular mention of UNFCCC/UN Climate Change and UNDP in this context.

Norway would strongly encourage a further fine-tuning of UNEP's contribution to combatting climate change and underscoring its strengths in respect of both mitigation and adaptation.

Thematic sub-programme 2: Nature (pp. 22-26)

Norway welcomes the emphasis of sustainable use and transformation, as well as the follow up to the post-2020 global biodiversity framework. However, we feel there is a mismatch between the description of outcome 1 and the activities listed below. We welcome the inclusion of a reference to risks related to biodiversity and ecosystem services.

Norway welcomes the overall text in respect of oceans, but would recommend that a reference be made to cooperation with the UNESCO-IOC in respect of outcome 3. This could be done, for example, by adding the following text in the first bullet point: "UNEP will continue to support integrated coastal zone management and marine spatial planning *and cooperate with relevant organisations, such as the Intergovernmental Oceanographic Commission of UNESCO.*"

Thematic sub-programme 3: Chemical and Pollution Action (pp. 26-30)

With respect to outcome 1, the sound management of chemicals and wastes minimizes health risks and it seems odd to us that the formulation could be understood as indicating it is a separate objective. We would propose that the outcome should read: Capacity and leadership enhance the sound management of chemicals and wastes, thus minimizing health risk linked to the environment.

We would propose including a reference to the polluter pays principle under the second bullet under outcome 1, for example, by adding a reference to the first sentence: “...frameworks and policies, building upon inter alia the pollution pays principle/approach.” Norway welcomes the reference to beyond SAICM and the One Health Approach under this bullet point.

With respect to the third bullet point, without any reference to implementation and compliance, the paragraph falls short of the mark in terms of its aim.

Finally, the fourth bullet point would at first glance appear both admirable and appropriate. However, we feel that there are some missing elements with respect to lessons learnt and experiences in the context of SAICM to achieving this goal which need to be acknowledged if this goal is to be realized.

We would propose the first bullet under outcome 2 should read: ...”divert and re-use current waste flows while ensuring safe secondary raw materials, and progressively...”. The reference to “unsound waste management practices” falls short of what is needed in our view. An important objective must be to avoid the reintroduction of or exposure to toxic materials into the environment.

Re. bullet point 2: it is not clear to us what “nature-based infrastructure” is.

Surely outcome 3 (reduced release of pollutants) is a product of outcome 1 and 2 (improved waste management)? For this reason, Norway is concerned that there is some duplication between these outcomes.

Norway welcomes the focus on marine plastic litter in the third bullet point under outcome 3, but the paragraph is a bit thin in respect of nutrients and chemicals. Given the uncertainty regarding marine litter going forward, the broad approach makes sense.

Norway welcomes the fourth bullet point (More system wide shifts...) and supports its scope and emphasis.

Foundational sub-programme: science-policy (pp. 30-33). Norway welcomes this sub-programme and hopes that the new narrative will be more effective in realizing the overarching nature of this programme, also in terms of budget resources. While we welcome the reference to the Global Environment Assessment Dialogue, the continuing challenge of increased institutionalization should be recognized.

Foundational sub-programme: environmental governance (pp. 33-35).

Norway also agrees with the significance attributed to this work. We would have welcomed an acknowledgement of the adverse impact of crimes with a significant impact on the

environment (environmental crime) on the SDGs, in particular given the links to the question of environmental rights.

Enabling sub-programme finance and economic transformations (pp. 36-39):

UNEP has played an important role in driving the sustainable finance and business agenda. Norway fully supports a greater emphasis on this. There are however many actors working on this, also within the broader UN system. Good coordination is therefore key. We would like to see more text on how UNEP will work with these other initiatives.

We take note of the reference to PAGE in para.2 (Promote business models...) on p. 37. We believe that PAGE also has an important role to play in respect of para. 1 (Reframe national development policies...) on the same page.

Enabling sub-programme Digital transformations (pp. 39-42)

Norway welcomes this sub-programme and believes it is a useful innovation and step forward. It is however a new area of work and as such, may be challenging to provide useful inputs on. However, from the point of view of our national experience in this area so far, we believe that it would be more appropriate to refer to public-private partnerships in the context of the development of digital architecture.

We would also note that the question of the complexity of access to, both in terms of suppliers and users of data is an important issue and should be better reflected, both in the MTS and probably also the Programme of Work.

Programme of Work

- **Objectives and theory of change (ToC):** There is a clear alignment between the MTS presentation of the overall objectives and the theories of change for each of the strategic objectives. However, the ToCs are only presented in a figure and it would be useful to develop a short narrative for each of them. We would like to know how you plan to report on the ToCs. Will you report on each of the strategic objectives separately or from a more integrated point of view? We recommend reporting on a more integrated manner to demonstrate how all the three strategic objectives are interlinked.
- **Contribution vs. attribution:** We find that the explanation and three levels of intervention, direct, enabling and influencing, provides a good overview of how UNEP assess their own level of attribution and contribution towards the main objectives. We would encourage that UNEP include information on this in their reporting.
- **Assessment of outcomes:** Most of the outcomes are clear and measurable, but some are comprehensive and include several objectives. Information on who the target groups are in relation to the planned results could be clearer.
- **Assessment of indicators:** We note that that the indicators mostly are variables that can be tracked. Baseline values and targets will be included later, but we also note that information on data collection is lacking. UNEP should consider developing an indicator guide with information on how data will be collected for each of the

indicators. We also note that the indicators are not linked directly to the outcome they will monitor. This will be a challenge. In addition, some of the indicators are quite comprehensive and therefore what data is being collected and what is being monitored is unclear.

- **SDG linkages:** The outcome level called “2030 outcome” seems to be aligned to the SDGs, but they are not identical to any of the SDG goals as far as we can see. This may not be an issue, but it might be useful to include some information on which SDGs they are aligned to. There is a list of SDG indicators that UNEP will contribute to and from this list we can also decipher the relevant SDGs. However, it would still be useful if the ToCs also included information on which SDGs are relevant for each ToC.
- **Gender equality:** is mentioned as a specific area that UNEP will focus on. However, there are no objectives included that cover gender equality specifically. This should be included.
- **Results/indicators at the organizational level:** We note that the MTS has quite a few references to how UNEP will work more efficiently, effective, results-oriented, include vulnerable groups etc. How will this be measured? We strongly recommend including this in the final PoW and results framework.

PoW 2022-2023 Budget

- In the PoW for 2022-2023 UNEP expects a decrease in earmarked funding compared to the current PoW. We would like to know more about the rationale for this assumption especially since you also aim for a core funding increase to the Environment Fund. The expected increase to the Environment Fund is mainly due to a revised resource mobilization strategy and the expectation that funding from member states will increase in line with the Voluntary Indicative Scale of Contributions. However, there are several other UN organizations that are not planning for an increase in core funding in the coming years. How do you assess the risk of not getting the expected core funding and what will be the consequences for the implementation of the PoW?
- The total budget for 2022-2023 is \$44.2 million lower than the budget for 2020-2021. At the same time, you plan for 29 additional staff in 2022-2023. It would be useful to know more about the costs you plan to reduce in order to finance the planned staff increase.
- Finally, we note that UNEP proposes a budget cut for the budget line Programme of work while the budget lines A. Policymaking organs, B1. Executive Direction and Management and E. Corporate services will increase with \$4.5 million. We would like to know more about the rationale for this as it seems that program costs will be cut while the administrative costs will increase.