

**UNEP – 4<sup>th</sup> Annual Subcommittee**  
**EU/MS comments on**  
**the Outline of the UNEA-3 theme Background document**

*Documents: Outline of the 2017 UNEA background document on Pollution, Note on the process of the background document for the 2017 UNEA*

**Comments:**

On outline document

- EU/MS thank UNEP secretariat for the Note, which provides a good basis for discussion;
- EU/MS believe the background note is an important instrument to inform discussions on pollution and instrumental to come to actionable outcomes at UNEA3;
- The pollution theme in UNEA-3 should be linked and contribute to the pollution-related SDGs and targets;
- The background document should take into account relevant scientific information and data (such as the Global Report on Health and Pollution, the Global Chemicals Outlook report, the Global Waste Management Outlook, the regional GEO-6-reports, the global GEO-6 process, the Towards cleaner air report under the LRTAP convention, relevant IRP reports and the forthcoming report of the Global Commission on Pollution, Health and Development) as well as input from UN MS and relevant stakeholders on relevant pollution areas and actions;
- EU/MS believe the background document should:
  - describe in a comprehensive manner and on a scientific and technical basis, states and trends of pollution (section 1 of the outline);
  - benefits of addressing pollution, including its contribution to the 2030 Agenda (section 2 of the outline);
  - relevant guidance principles and transformative action areas (section 3 of the outline)
  - key drivers and barriers of addressing pollution, including:
    - the international framework to tackle pollution, as well as
    - examples of where successful/comprehensive action at different levels is being taken (part of section 2 of the outline)
  - mobilize (voluntary) actions and commitments that help address pollution
  - recommendations on areas where further action (including by the international community) is required and feasible;
- EU/MS would not support a mere compilation of actions that have already been set in motion;
- EU/MS welcome the interactive map of successful initiatives and projects on pollution that is to be set up on UNEP live;
- Furthermore, we would like to suggest some changes to the outline document. Our detailed comments will also be provided in writing.
- Key points we would like to raise are:
  - On section 1, we stress the importance to include impacts that go beyond ecosystem and health impacts, we suggest to include outlooks and emerging issues, if possible and we prefer that waste also be included as a cross-cutting issue together with chemicals.
  - On section 2, we suggest to revise the order of the paras to 2,3,1. Focus should be to describe the benefits of addressing pollution and its contribution to the 2030 Agenda, which could be illustrated by success stories on the benefits of environment action for health, security, development and inclusion of the most poor and vulnerable.
  - On section 3, generally, we support the set-up for this section, including its intent to build further on the action lines described in the HEHP report for UNEA-2. In that respect, EU/MS would like to see also the 4<sup>th</sup> action line of the report, to enhance ecosystem resilience and protection of the planet's natural systems to be taken into account in the guidance principles. In the final document it should be clarified at which levels the transformative actions relate to (national, regional, international) and

what stakeholders are involved (MS, international organizations, civil society, business, science and academics associations).

- We would like to suggest to include a new section (3bis) which would describe in a comprehensive manner key drivers, existing tools and barriers to tackle pollution, including the existing international framework;
  - On section 4, further clarification is required as to the intent of this section which seems to describe what we need but not how to get there. We would like to seek clarification from UNEP whether the background document would contain existing or new pledges (part *Pledges and commitment*). If new pledges would be included, on what basis and with what calendar would UNEP consider or not to take up any pledged action from MS, partnerships or relevant stakeholders? EU/MS prefer new pledges as part of the outcomes of UNEA rather than part of a background document.
  - On the Conclusion, EU/MS would like to see the conclusion to focus on concrete recommendations on key actions to curb pollution, including cross-cutting or sectorial improvements to be made to the international policy framework, on the basis of the analysis of the state, trends and existing international policy framework and actions on pollutions in the sections above. Overall, EU/MS would rather have a conclusion that elicits an action-oriented debate on how to get to a "pollution free planet" rather than a debate on what it would look like.
- More detailed comments will be provided in writing.

#### On process

- We welcome the clarification on the process for the background document;
- We also welcome the intention to consult with relevant stakeholders;
- At the same time, we would like to stress the importance that the analysis is based on a scientific and technical basis and would therefore like to suggest that consultations may focus on key drivers and barriers for action and possible actions;
- EU/MS note that the final draft would not be presented to UNMS before the second half of September.
- In light of the importance of the document to prepare for UNEA3, EU/MS would like to request UNEP to bring this deadline forward to 15th of June, or to present a draft version, so that the document can be a meaningful input to the discussions relevant to UNEA3 outcomes, including in the preparation of resolutions.
- We understand that the preparations on the section on pledges and commitments may need more time for consultation with stakeholders for the document to be finalized.

#### **Detailed comments (only in writing):**

- **Section 1: Evidence exists of a polluted planet that impacts human health, ecosystems, and economies**
  - EU/MS support this section should describe state and trends with regards to key pollution risk areas;
  - Where possible, this section should also include outlooks and emerging issues;
  - We would avoid naming specific waste categories in point f) of the outline and prefer that waste be included as a cross-cutting issue, similar as chemicals and suggest that waste is included under point e) "chemical and waste pollution as a cross cutting issue.
  - EU/MS stress the importance to go beyond the health consequences of pollution which were discussed in UNEA 2, and include impacts on labour productivity, economic costs of e.g. damage to infrastructure, loss of land, biodiversity and/or ecosystems, opportunities, revenues, costs of decontamination, etc.
- **Section 2: What would it mean to people to have a pollution free (or clean) planet**
  - This section should focus on the benefits of addressing pollution.
  - EU/MS would like to suggest to revise the order of the paragraphs, so focus of this section would be on:

- Economic and social benefits of action to prevent and tackle pollution, such as cleaner, more valuable resources, better health and well being, including examples of multiple benefits. Where possible, examples should be provided of costs of inaction in addressing pollution.
  - Arguments of how securing a pollution free (or clean) planet can help achieve the Sustainable Development Goals and respond to existing agreements (e.g. Paris agreement, Kigali amendment to the Montreal Protocol, and chemicals and waste conventions);
  - Case stories of progress made **and concrete benefits** in addressing pollution over the past decades/successes (e.g. Montreal protocol, lead in fuels, lead in paints, acid-rain, Minamata convention, etc.) synthesized in graphics, or by sector.
- **Section 3: A Framework of Guidance Principles and Transformative Actions**
    - With regard to guidance principle number 6, EU/MS support to build from the 4 action lines described in the report Healthy Environment – Healthy People, as was broadly welcomed by UN MS at UNEA-2. We would like to suggest however, to ensure that the language used is crisp and clear and be brought in line with the SDGs where relevant, eg. on decoupling. We also wonder why the 4<sup>th</sup> action line, enhance ecosystem resilience and protection of the planets’ natural system isn’t mentioned here, we think it is an important aspect to tackle pollution and that it should be included.
    - We would like to seek clarification on which levels the transformative actions relate to (national, regional, international) and what stakeholders are involved (MS, international organizations, civil society, business).
    - The list of transformative actions looks quite comprehensive. However, EU/MS would like to see ‘sound chemical and waste management’ be included under point 6.
  - **Section 3 bis:**
    - We would like to suggest to include a new section (3bis) which would describe in a comprehensive manner key drivers and barriers to tackle pollution, including the existing international framework and [and a gap analysis of the existing tools at international level, including the existing financial mechanisms, in relation to the transformative actions in section 3];
    - Further to section 2, this could be illustrated by successful examples
  - **Section 4:**
    - Further clarification is required as to the intent of this section which seems to describe what we need but not how to get there. We would like to seek clarification from UNEP whether the background document would contain existing or new pledges (part *Pledges and commitment*)? If new pledges would be included, on what basis and with what calendar would UNEP consider or not to take up any pledged action from MS, partnerships or relevant stakeholders? EU/MS prefer new pledges as part of the outcomes of UNEA than part of a background document.
  - **Conclusion:**

EU/MS would like to see the conclusion to focus on concrete recommendations on key actions to curb pollution, including cross-cutting or sectorial improvements to be made to the international policy framework, on the basis of the analysis of the state, trends and existing international policy framework and actions on pollutions in the sections above. Overall, EU/MS would rather have a conclusion that elicits an action-oriented debate on how to get to a “pollution free planet” rather than a debate on what it would look like.