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Federal Department of the Environment,
Transport, Energy and Communications DETEC

**Federal Office for the Environment FOEN
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United Nations Environment Programme
Jorge Laguna-Celis
Secretariat of Governing Bodies
PO Box 30552 – 00100
Nairobi, Kenya

Reference: Q393-0441
Your reference:
Our reference: KOS
Contact person: KOS
Bern, 6 October 2017

Switzerland Comments on the First Draft of the Ministerial Outcome Document

Dear Mr. Laguna-Celis,

We refer to the letter by H.E. Mr. Edgar Gutiérrez, President of the United Nations Environment Assembly and Minister of Environment and Energy of the Republic of Costa Rica, on the Ministerial Outcome Document, dated September 20, 2017. We would like to bring this letter to the attention of the UNEA President and the representative of Costa Rica in Nairobi.

First of all, we would like to stress that the underlying draft systematically addresses the broad topic of pollution and many action items are particularly to be supported and kept. Also, we value the President's systematic approach to back the statements with research.

Here, we want to make some general and a few specific comments. Many elements of our comments to the zero draft of the ministerial declaration have been taken into account. Here, we reiterate some of the important points and highlight some new elements that will improve the underlying first draft.

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Overall document

Consider the target audience and authors of the final document when further elaborating the language of the ministerial outcome document. The language is currently unbalanced. The text varies between a high-level, approachable and easily understandable language and a more detailed and specific language that uses technical terminology that might be less accessible.

We value that Sustainable Development Goals are being addressed in the underlying draft. We would like to see more explicit language as to what extent the efforts towards a pollution-free planet will be a significant contribution to achieving the SDGs. Even a greater impact is achieved when highlighting the contributions to the six SDGs that will be under review at the High Level Political Forum on Sustainable Developments half a year later in July 2018.

We would like to question the inclusion of “sustainable chemistry” into this declaration. We believe that it is not timely, as more work has to be done on specifically defining “sustainable chemistry” in its entirety.

We fully support the reference to a strong science basis for policy making, as it also speaks to the one of the core elements of UNEP’s mandate. We encourage to refer to the specific processes of UNEP’s Flagship Report, the Global Environment Outlook GEO, and the internationally agreed environmental goals (formerly known as Global Environmental Goals) as the underlying core for the science-policy interface mentioned here.

Page 2, paragraph 8, adjust.

In the Executive Director’s Report “Towards a Pollution-free Planet” we particularly value the proposed priority interventions, actions and enablers. Here, the reference is made to that report, however, the text lacks the reference to those important areas.

*We acknowledge the magnitude of challenges and, opportunities, **priority interventions, actions and enablers** identified in the United Nations Environment Programme Executive Director’s Report, Towards a Pollution-Free Planet.”*

Page 2, paragraph 9, adjust.

Systematic observation of the environment is a key element of addressing “pollution” and should be explicitly mentioned. The terms “research” and “science” do not completely cover the domain of systematic observation.

*9a: Supporting the development, collation and use of reliable **observational and** scientific data. This includes better **sets of essential variables in environmental domains and** multidisciplinary indicators;
9b: ... And by increasing research **and monitoring** on pollutants where the impact is not yet clear.*

Page 2, paragraph 9, adjust.

The focus on pollutants does not adequately talk to the resource efficiency and the life-cycle approach. The latter is, however, vital when looking at the aspect of pollutants through every stage of production or the supply chain.

*9b: Targeting pollutants **and sustainable use of resources** through environmental agreements and tailored action **at every stage of the production or supply chain.** “*

Page 3, paragraph 12, adjust.

The paragraph requests the Executive Director to engage interested stakeholders in establishing a common platform for action on pollution for consideration at UNEA 4. The proliferation of platforms is not leading to the advancement of the cause. Instead we would advise you to highlight existing platforms, many of them under the auspices of UNEP, to target action-oriented work on pollution. An example of such an existing platform is the Green Growth Knowledge Platform of UNEP.

We hope that our comments improve the underlying document and that it will be a valuable basis for the continued elaboration of the draft of the Ministerial Outcome Document.

Yours sincerely

Federal Office for the Environment FOEN
The Head of the International Affairs Division



Franz Perrez
Ambassador

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