



Feedback Switzerland

Consultation on 1st Draft of PoW and Budget 2010-2021

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Chapter	Page/Table	Paragraph / Section	Proposed changes to text	Argumentation / Comments
I. Introduction	3	Para 1	Amendment to para 1: “... and 76/213 in 2012. UNEP is the authoritative voice by generating relevant scientific information, by providing overarching policy guidance, and by developing adequate international policies. ”	It is critical that the reader understands the overall mandate of UNEP and is not solely referred to the reference documents.
I. Introduction and General (all doc)	3 / all	Para 3 and all	Ensure that the science-policy interface consistently addresses scientific information on all SDGs: “ <i>Science is fundamental in providing answers to address some of the most pressing sustainability issues of the twenty-first century. Strengthening the science-policy interface in a consistent way across the SDGs to inform society of the risks as well as the opportunities of new developments is therefore at the heart of the work of the UN Environment Programme and embedded across the Programme.</i> ”	We fully agree and support this vision, paragraph 3, page 3. This applies to all the seven priority areas.
I. Introduction	4-11	multiple	We leave the specific changes to the text to the discussion on the budget in the Annual Subcommittee Meeting as they define the text in these sections	Generally, we will argue for a realistic budget across all budget lines. A decision on a single budget number is not adequate, as we need to evaluate at each budget line, which one is the most realistic one. Is an overall budget increase of 15% realistic given the decrease in EF funding and the budgetary pressure across the UN System (declining budgets in other UN entities)?

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I. Introduction	9	19	19. [...] Therefore in 2020-2021 the UN Environment Programme has realigned the planned activities in realistic approach [...]	In official documents, the “United Nations Environment Programme” or “UNEP” is to be used. Check also the entire document and correct where applicable: e.g. pages 49/50 on the indicator section, or page 68.
I. Introduction	9	19	Additional text (<i>placing tbd</i>): Anticipated efficiency gains of this next generation module are expected to reach \$ XY.	The module is expected to reduce efforts and to eliminate redundant processes pertaining to project portfolios. The anticipated efficiency gains should be communicated.
I. Introduction	10	7	No changes only a question with regards to the planned policy changes in the GEF 7. [...] and global trust funds (GEF, GCF) funding of 110 million.	Do the planned project delivery figures for the GEF for 2020-21 already take into account the foreseen policy changes in the GEF (max. share per agency financed through the GEF of implementing agencies total project portfolio)? Based on the current discussions in the GEF Council, UNDP could currently not implement any new projects. How is UNDP planning to respond to the planned policy changes in the GEF? It seems there are only two global trust funds. Hence naming them in the introduction would add clarity.
II. Policymaking organs	12	Para 33	Delete: “33. The Secretariat of Governing Bodies provides secretariat support to the Environment Assembly and its subsidiary body, the Committee of Permanent Representatives. The Secretariat also serves as the main interface for external relations with representatives of the UN Environment Programme governing bodies, and with representatives of Major Groups and Stakeholders, including the private sector . The table below sets out the expected accomplishments, indicators of achievement and outputs.”	Redundant as the term “Major Groups and Stakeholders” includes the private sector. There is no reason to highlight one specific actor of the groups and stakeholders.

II. Policymaking organs	12	Paras 34 and 35	<p>Delete:</p> <p>34. The United Nations Environment Assembly provides a unique platform through which different stakeholders can work together to achieve solutions to our global and interconnected environmental challenges. Governments, civil society and private sector realize that many solutions to environmental challenges will require working closer together in partnerships—moving away from the notion of incremental change to transformational change.</p> <p>35. Public-private partnerships have the capacity to promote and spur innovation and leverage new technologies that can then be scaled up or replicated for wider impact. The UN Environment Programme continues to nurture these partnerships in high-level events that take place on the margins of the Assembly, including in the Sustainable Innovation Expo, where companies have an opportunity to exhibit their innovative solutions and contribute to the global environmental agenda and resolutions at the Assembly.</p>	<p>The Chapter is dedicated to the the “policy making organs”.</p> <p>Their relevance for policymaking organs is unclear. Impact on policy making compared to bodies in other other paras in same chapter is very low. PPPs are means to implement policies, however, they are not policy making organs.</p> <p>Alternatively, under UNEA there can be a mentioning of all non-governmental actors to participate in the policy making organ that is UNEA. Please refer to <i>all</i> stakeholders alike.</p>
II. Policymaking organs	13	Table (a)	<p>Adjust:</p> <p>“Environment Assembly attracts significant interest from key decision-makers and stakeholders, including the private sector”</p> <p>New indicator:</p> <p>(iv) Number of UN representatives, in particular from MEAs, attending the UN Environment Assembly</p> <p>Add Baseline etc.</p>	<p>There is no reason to highlight one specific actor of the groups and stakeholders.</p> <p>Alternatively, name <i>all</i> actors (incl. <i>iv</i>) as listed under the indicators section.</p> <p>In particular, MEA representation at UNEA is key.</p> <p>Baseline etc missing</p>
II. Policymaking organs	13	Table (b)	<p>Delete:</p> <p>“(b) Partnerships that catalyse action and commitment through the Environment Assembly and its resolutions”</p> <p>Alt b):</p> <p>(b) Environment Assembly sets global environmental policy agenda for the upcoming years</p>	<p>There is no reason to develop an accomplishment that is entirely dependent on a sub-group of stakeholders. As mentioned earlier, partnerships are not a policy making organ.</p>

			Use parts of POW/B 18-19 for suitable indicator: (ii) Percentage increase of surveyed UNEP partners in Governments and in the United Nations system that rate as useful the Environment Assembly in providing policy guidance to important global environmental issues	This alt achievement speaks directly to the mandate of UNEA that is to set the global environmental agenda, and develop international policies. Important: UNEA is the main policy setting organ and an achievement must relate to the decision-making of the Assembly, with member states at its heart
II. Policymaking Organs	13	(ii)	Adjust: (ii) The number of private-sector partners that contribute to the implementation of UNEA resolutions and the delivery of the Programme of Work. <i>Unit of Measure:</i> <i>The Private Sector Unit will track areas of cooperation through its partnerships that align with UNEA resolutions and the fulfilment of areas of the Programme of Work.</i>	Delivery on the PoW is a core indicator of UNEP's overall performance and should hence be specifically mentioned in particular with regard to policymaking organs.
Subprogramme 1: Climate Change	20	General	Reflect not only SDGs, but also the objectives of the Paris Agreement (Art. 2.1a-c & Art. 4.1)	The first page reads as if the one and only goal of the subprogramme on climate change is to implement and achieve the SDGs. This should clearly be one of the objectives, but the objectives of the Paris Agreement must be the main objectives, because it seems all the expected accomplishments focus on the SDGs.
Subprogramme 1: Climate Change	22	Table	<i>Project progress reports: low-emission development strategies submitted pursuant to Art. 4.19, national communications, and intended nationally determined contributions (INDCs) to the Framework Convention on Climate Change; Framework Convention on Climate Change synthesis reports on national communications and INDCs</i>	Parties are invited to submit low-emission development strategies under the Paris Agreement by 2020 (Art. 4.19). This should be reflected as a source of information on progress in adopting and implementing low greenhouse gas emission development strategies. Also, unclear why the text refers to INDCs and not NDCs (INDCs became NDCs through the ratification). The synthesis report by the secretariat on the other hand was published on the basis of the INDCs.

Subprogramme 1; Climate Change	26	42.	Adjust: 42. <i>UNEP will continue to engage with non-State actors, including the private sector, for example [...]</i>	In our understanding, the private sector proponents are non-State actors. A specific mentioning of the private sector does is rather misleading than clarifying.
Subprogramme 1; Climate Change	27		General question pertaining to all subprogrammes sections.	Why was the table of planned outputs (previous PoW/B, p.28) deleted?
Subprogramme 3 : Healthy and productive ecosystems	43	new	Add achievement, (c) “ <i>(c) The development of the new post-2020 global framework for biodiversity is discussed with all biodiversity related MEAs and other stakeholders with a special focus on synergies between the treaties, their secretariats and in the field of the reporting duties by parties to the conventions.</i> ” Add indicator to c) “ <i>The relevant bodies of the different biodiversity related MEAs have actively taken part in the definition of the new post-2020 global framework for biodiversity. UNEP has facilitated this process. The online reporting tool DaRT developed by UNEP InforMEA is operational. </i> ”	The
Subprogramme 3 : Healthy and productive ecosystems	45	bis	Add achievement, (c) “ <i>(c) The development of the new post-2020 global framework for biodiversity is discussed with all biodiversity related MEAs and other stakeholders with a special focus on synergies between the treaties, their secretariats and in the field of the reporting duties by parties to the conventions.</i> ” Add indicator to c) “ <i>The relevant bodies of the different biodiversity related MEAs have actively taken part in the definition of the new post-2020 global framework for biodiversity. UNEP has facilitated this process. The online reporting tool DaRT developed by UNEP InforMEA is operational. </i> ”	UNEP must play an overarching, coordinating and guiding role in the new post-2020 global framework for biodiversity. Indicators for measuring the synergies process exist.

Subprogramme 3 : Healthy and productive ecosystems	49	bis	Add, 62bis <i>“UNEP will actively undertake a coordination among the biodiversity related multilateral environment agreements to allow a broad discussion of the new post-2020 global framework for biodiversity supposed to be adopted by CBD COP in 2020 and subsequently be endorsed by the relevant bodies of the other relevant treaties. UNEP will put emphasis on the integration of the SGDs in the new framework. UNEP will support the realization of synergies between the actors responsible for the implementation of the framework, including by supporting parties to make use of modular Internet based data reporting tool (DaRT) that UNEP-InforMEA is developing. “</i>	UNEP must play an overarching, coordinating and guiding role in the new post-2020 global framework for biodiversity. Indicators for measuring the synergies process exist.
Subprogramme 4 : Environmental Governance	54	Para 66	Add <i>“66. Important ingredients for inclusive, sustainable and coherent governance include: data and science-based, well-informed and coherent policies; mechanisms to translate multilateral environmental agreements, the sustainable development goals, the internationally agreed environmental goals, and other international commitments into national policies, legislation and action, and to ensure that such action is well coordinated;”</i>	The justification of referencing the internationally agreed environmental goals in the Strategy here are given in the paragraphs following this paragraph.
Subprogramme 4 : Environmental Governance	54	Para 69	Delete <i>“... The UN Environment Programme will continue to promote the uptake of environmentally sound practices in the UN system through its Greening the Blue initiative and will embed its efforts in the revised institutional framework resulting from the ongoing UN reform....”</i>	Level of reporting: This strategic document should not be listing and highlighting a single Initiative. The EMG has various ways of promoting a coordination of strategic environmental mainstreaming across the UN.
Subprogramme 4 : Environmental Governance	54 / 55	Para 71	Delete <i>“71. The UN Environment Programme will also promote stronger national and sub-national institutions, better implementation and enforcement capacities, improved public information and awareness, and enhanced policies and law making to enable the achievement of environmental goals.”</i> <i>“ ... implementation of policy and legal frameworks and of translating these into reality in peoples’ lives. It will also continue to promote the</i>	UNEP does not have the mandate to work at a sub-national level and on the ground. UNEP, in comparison to UNDP, is not an implementing agency. It is mainly to provide support in form of normative work.

			<i>environmental rule of law and environmental rights and their safe enjoyment, in close collaboration with human rights focused organizations in the UN system and on the ground.”</i>	
Subprogramme 4; Environmental governance	55	72.	Delete: 72. [...] It will strengthen and expand its collaboration with UN entities and bodies and other international organizations working on environmental governance, including UNDP, UN DESA, [...]	Listing a select number of UN entities bears the risk of forgetting one (e.g. WHO). A more generic formulation would be preferable. Alternatively, the complete enumeration could be done in a footnote.
Subprogramme 4 : Environmental Governance	55	Para 73	Delete and integrate in 71. <i>“73. Recognizing that faith-based organizations play a leading role for promoting change and engaging communities in efforts to promote environmental sustainability, the UN Environment Programme will build partnerships and engage in initiatives with these organizations to increase awareness globally, deepen the engagement of communities and citizens, and promote green investments by relevant faith-based institutions.”</i>	While already being part of the generic group of “other public stakeholders” mentioned in 71., faith-based organizations could be enumerated along with other important actors for change. Dedicating a separate para to them does not adequately reflect their respective relevance in comparison to other important actors. The added value of this new strategic push towards the improving environmental governance needs to presented and then discussed by MS.
Subprogramme 4 : Environmental Governance	55	Para 74	Adjust 74. Through the Environmental Governance sub-programme, the UN Environment Programme will contribute to sustainable development goals that address specific environmental priorities in all of the 17 SDGs (for instance on climate action, life below water, life on land, good health and well being), and to goals 16 and 17, focusing respectively on peace, justice and institutions and partnerships for the goals. The UN Environment Programme, as the custodian agency for indicator 17.14.1 on policy coherence for sustainable development (measuring the number of countries with mechanisms in place to enhance policy coherence of sustainable development), will work with partners and member states in refining and applying a methodology for measuring and further advancing mechanisms for policy coherence at the national level.	Originally the text lists generally those SDGs with a clear sectorial focus on environment. However, it is key to speak to all SDGs in an integrative manner and in particular to those too that do not seem to have a particular environmental focus. UNEP needs to show and deliver on environmental elements in all SDGs (mainstreaming) by sticking to its mandate and capabilities/strengths.

Subprogramme 4 : Environmental Governance	56	Para 75	Delete <p>“ ... An important driver will be the effective positioning of UN Environment Programme within the reformed UN Development System and related interagency processes, and the availability of resources to meaningfully engage at country level in joint efforts across the United Nations and beyond to implement the 2030 Agenda and specific Sustainable Development Goals.</p> <p>“ ... implementation of policy and legal frameworks and of translating these into reality in peoples’ lives. It will also continue to promote the environmental rule of law and environmental rights and their safe enjoyment, in close collaboration with human rights focused organizations in the UN system and on the ground.”</p>	UNEP does not have the mandate to work at a sub-national level and on the ground. UNEP, in comparison to UNDP, is not an implementing agency. It is mainly to provide support in form of normative work.
Subprogramme 5; Chemicals, waste and air quality	59	2 nd row: Indicators of achievement: (i) Increase in the number [...]	(i) Increase in the number [...], where possible applying a multi-sectoral approach	Delete; a “where possible” indicator cannot be measured.
Subprogramme 6 : Resource Efficiency	70	Table c) and additional achievements	Adapt c) and possibly add additional achievements and indicators from the 10YFP and particularly from the “indicators for success” work of UNEP 10YFP Adapt all indicators in “unit of measures” towards the recently adopted framework “indicators for success” by the 10YFP.	The UNEP 10YFP has produced a detailed and thorough framework of indicators speaking to the complete shift in SCP. They are also linked to the SDG indicators. The 10YFP has increasingly become the reference framework for SDG12 and SCP. The PoW/B on SCP must be in sync with the work by UNEP’s own 10YFP! http://www.oneplanetnetwork.org/sites/default/files/10yfp_indicators_of_success_2017_pdf.pdf
Subprogramme 6 : Resource Efficiency	72	Para 100	Separate and Amend: <i>100. Flagship initiatives such as the Ten-Year Framework of Programmes on Sustainable Consumption and Production/One Planet Network, the United Nations Environment Finance Initiative and the Partnership for</i>	This para originates from the UNECE Regional Forum on Sustainable Development 2018 and is a prerequisite for the reference and work of the Belt and Road Initiative

			<p>Action on Green Economy as well as the SWITCH to Green Programmes are key delivery and implementation mechanisms to scale up impact.</p> <p>100bis A successful delivery of the SDGs requires investments in and improvement of infrastructure. Infrastructure projects present an important opportunity to accelerate the transition to a more resource efficient economy if investment decisions are fully aligned with the SDGs and if big infrastructure developments, such as the Belt and Road Initiative, do not put undue additional pressure on the environment. In this context, a particular concern is the increasing extraction of raw materials especially in the pan-European region. The development and implementation of global standards for the extraction of raw materials strengthen the level playing field across countries and businesses, facilitate a fair access and sustainable management of mineral resources, and so enable the extractive industries to fully contribute to the achievement of the SDGs.</p> <p>100bisbis : The Coalition to Green the Belt and Road, with its secretariat hosted by the United Nations Environment Programme, is a leading partnership that will help to mobilize international expertise and best practice to inform large scale infrastructure investments with the aim to promote environmental safeguards and to align investments with the sustainable development agenda.</p>	
Subprogramme 6 : Resource Efficiency	72	Para 101	<p>Adapt:</p> <p>“101. Through the <i>Ten-Year Framework of Programmes on Sustainable Consumption and Production/One Planet Network and its Multi Partner Trust Fund</i> for sustainable development goal 12, the United Nations Environment Programme works with more than 600 partners across”</p>	This is an official UN documentation. We must adhere to the correct name as adapted at the Rio+20 conference.
Subprogramme 6 : Resource Efficiency	73	Para 103	<p>Delete:</p> <p>“103. To achieve the envisaged 2030 impact, the United Nations Environment Programme supports countries and sub-national governments, and cities to institutionalize capacities and implement frameworks, policies and action plans ...”</p>	UNEP does not have the mandate to work at a sub-national level and on the ground. UNEP, in comparison to UNDP, is not an implementing agency. It is mainly to provide support in form of normative work.

Subprogramme 6 : Resource Efficiency	74	Para 108	Delete: <i>“108. While there are strong capacities, partnerships, networks, and delivery platforms in place, delivery of the programme of work will depend on continued and increased support from donors, including the private sector, and member states and non-state actors. Effective private sector engagement is crucial in this regard, since financing of the sustainable development agenda as a whole, and financing of the shift towards sustainable consumption and production patterns in particular, is required. Green finance is hence a priority within the subprogramme since its aim is to support the financial system itself to align to the Sustainable Development Agenda.</i>	Adjust and remove redundancy. Private sector is included non-state actors. Member states remain the main donors and most importantly the main stakeholders of this UN entity.
Subprogramme 7 : Environment under Review	77 81	Objectives Strategy (110)	Adjust <i>“Governments and other stakeholders are empowered with quality assessments and open access to data and information to deliver evidence-based environmental assessments at the global level and the environmental dimension of sustainable development”</i> <i>(i)</i> <i>Increase in the number of tagged and maintained datasets available in the United Nations system data catalogue enabling systematic user access to relevant data on global environmental assessments and the environmental dimension of the Sustainable Development Goals</i> <i>The overall objective of the environment under review subprogramme is to empower Governments and other stakeholders in delivering global environmental assessments and the environmental dimension of sustainable development by keeping the environment under review. The subprogramme aims to inform policy action with environmental assessments and open access to high quality and relevant data and information and also on the environmental dimension of sustainable development. Therefore, the subprogramme provides the enabling conditions whereby countries institutionalize SDG method development, data calibration, and monitoring and reporting.</i>	Although we fully support the objective of the environment under review subprogramme to ensure “open access to high quality and relevant data and information.”, we do not agree on the purpose of this subprogramme. This is not just an issue on delivering the environmental dimension of sustainable development, but firstly to deliver environmental assessments at the global level (including strengthening the science-policy interface, delivering environmental assessments, identifying emerging issues and fostering policy action). To that aim, the subprogramme should request from countries that they ensure open access to their data. We note that in view of reaching this objective, it would be helpful to collaborate with the Group on Earth Observations (GEO), one of which aims is precisely to promote open access to data.

V. Programme management and support	85	122	Additional text (placing tbd): Anticipated efficiency gains of this next generation module are expected to reach \$ XY starting 2020.	According to the para, the next generation module is expected to reduce efforts and increase efficiency and effectiveness. The anticipated efficiency gains should be communicated.
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