



**143nd meeting
of the Committee of Permanent Representatives of UNEP
28 September 2018**

Interventions on behalf of the EU and its MS

Agenda Item 4: Report of the Executive Director

- Madame Chair, Mister Executive Director, distinguished delegates and observers, ladies and gentlemen; it is my privilege to speak on behalf of the European Union and its Member States. Serbia and Ukraine align themselves with this statement.
- Allow me also to warmly welcome the Deputy Executive Director, Ms Joyce Msuya and congratulate her on the appointment. We look forward to working with you very closely.
- We thank the Executive Director for his update on the activities of the Secretariat and the progress on the implementation of the Programme of Work and Budget and the UNEA resolutions. We appreciate the improvement and we want to continue engaging with the Secretariat and the CPR Bureau to further improve this very important tool. Notably, we would welcome more systematic references to the implementation of resolutions across the report on the sub-programmes.

- We would like to express our appreciation for the leadership of the UN Environment Programme with regard to the efforts leading to promoting the environmental agenda and enhancing the international environmental cooperation. In this context, we would like to recognise the very good engagement of the UN Environment Programme in the High Level Political Forum, the G7 environment ministerial meeting and, most recently, the UN General Assembly. We are also very glad to see highlighted the continuous cooperation between the European Union and the UN Environment Programme through joint programmes and the policy dialogue, including the high level meetings held in June, which discussed the preparations for UNEA-4 and the climate&environment-security-peace nexus.
- We take note of the update on "cross cutting areas and special initiatives", including the information on the "Greening the Belt and Road Initiative". While we appreciate that a dedicated briefing has been foreseen for the CPR subcommittee, we would like the Executive Director to update on the progress on the announced consultations on the UN Environment Programme's engagement with the China-Africa Environmental Cooperation Center. We would also appreciate if he could elaborate on his proposal for the World Environment Forum and a role envisaged in this initiative for the UN Environment Programme.

- Concerning the financial resources, we appreciate the clear information provided in the report, including on the income and the allocations of the available funds. We also appreciate the regular updates on the contributions received. We remain seriously concerned about the fact that currently only one third of Member States provide contributions to the Environment Fund in spite of the universal membership of the organisation. We would like to urge the Executive Director to increase the engagement with Member States and take all necessary steps to ensure and on that basis convince the current and potential contributors that supporting the UN Environment Programme is a good use of tax payers money, as the funds will be invested in highly relevant activities and managed responsibly.
- With regard to the human resources, we are concerned about the lengthy processes of recruiting the senior management personnel, which in turn result in prolonged periods of vacancies or “ad interim” arrangements at key managerial positions which are critical for the delivery of the organisation. While we are conscious that some inefficiencies are of a more horizontal nature and need to be addressed across the UN system, the UN Environment Programme should take necessary steps on its side to avoid mistakes leading to recurring delays in the recruitment procedures or re-advertisement of posts. On a related issue, we would welcome a strengthened engagement of the senior management of the UN Environment Programme with the staff.

- Also, as a general remark, we would like to reiterate our proposal to create an interactive platform where Member States could deposit their questions and suggestions in advance of CPR meetings, so that the Secretariat prepares its answers and schedules relevant speakers to address the issues at stake.
- Finally, we would like to refer to the ongoing audit of the official travel of the UN Environment Programme which is referred to in the Executive Director's update as well as in his recent letter to the CPR on the occasion of the press information about the preliminary findings of this report.
- We regret that a preliminary draft audit report was leaked before the UN Environment Programme has had a chance to comment on the findings. This has the potential to cause undue damage to the organisation. We await and look forward to the final report and its recommendations. We, however, appreciate the proactive response by the management of the UN Environment Programme on the alerting preliminary findings. We expect the management of the UN Environment Programme to vigorously take appropriate corrective actions and to keep the Member States duly informed.

Agenda Item 6: Preparation for the 5th Annual Subcommittee meeting

- The EU and its Member States welcome the idea of a “retreat”-format at the Annual subcommittee meeting which will facilitate

more direct and in-depth discussions about the implementation of the current Programme of Work and Budget (2018-2019), as well as the drafting of the Programme of Work and Budget for 2020-2021. Indeed, the new Programme of Work should build on lessons learnt from the implementation in the current and previous periods.

- In light of this, we emphasize the importance of the reporting, including on the Programme performance. We see room for improvement in this regard, particularly when it comes to linking the implementation activities to concrete results achieved. We look forward to discussing this during the upcoming Annual subcommittee meeting.
 - With regard to the draft Programme of Work, we presented our initial comments in the subcommittee meeting last week, including our appreciation of the good structure of the document and its alignment with the SDGs and the 2030 Agenda. We also consider the drafting of a new Programme of Work to be a good opportunity to further reflect on the strengthening of the engagement with the private sector as well as the South-South Cooperation and how this can be included in the Programme of Work in coherent manner. We would still seek improvements in the results framework and the indicators. We will submit further comments in writing today, as requested by the CPR Chair (Annex 1). We however continue

analysing the document, and envisage submitting more detailed comments in the next iteration of the process.

- Concerning the proposed Budget envelope, we expressed our concerns in June, but unfortunately we still don't have the clarity about the consequences of the options proposed by the Secretariat. Notably, we should discuss the pros and cons and underlying motivation for the budget proposed, and how this relates to the anticipated resources as well as the activities in the Programme of Work.
- Furthermore, we think it would be useful to discuss how to find a right balance between the realistic estimations and the ambition with regard to resources mobilisation. When setting the target for the Environment Fund, we need to understand the impacts on the motivation of the contributors, as well as the impacts on the VISC mechanism (Voluntary Indicative Scale of Contributions).

We also think the Programme of Work and Budget should enclose a prioritization plan, in case resources do not ultimately meet expectations or pledges.,

- Lastly, we underline the importance of having a transparent, inclusive and open preparation of the Programme of Work and Budget. We look forward to the next steps in this process to provide a good engagement and more clarity on the issues highlighted above. One important issue should be to ensure that the potential "special initiatives" proposed by the Executive Director

should contribute fully to the objectives of the Programme of Work and Budget.

Agenda Item 7: Implementation of the UN Environment Assembly Resolution 2/8, entitled Sustainable consumption and production

- The European Union and its Member States are strong supporters of concrete action by the global community in favour of sustainable consumption and production, including by funding the 10-Year Framework of Programmes on Sustainable Consumption and Production Patterns, the International Resource Panel, and the Partnership for Action on Green Economy.
- We are domestically engaged in a shift from a linear and wasteful economy to a low-carbon, resource efficient and circular one. Sustainable consumption and production considerations are a cornerstone of the EU's 2015 Circular Economy Action Plan.
- We are however acutely aware of the need for a global transition, as recognised right at the outset in UNEA Resolution 2/8: *'(...) fundamental changes in the way societies consume and produce are indispensable for achieving global sustainable development'*, and thank UNEP for the progress update in the Resolution's implementation.
- We agree on the transformative role of the work by the 10-Year Framework, which would however require to be even more

synergic with other UNEP-led initiatives, such as the International Resource Panel, and the Partnership for Action on Green Economy.

- We understand that the International Resource Panel will present its first fully-fledged Global Assessment of the Natural Resources Use and Management at UNEA-4, in response to the Resolution at hand. We look forward to it and invite UNEP's Executive Director to ensure that its findings are properly taken into account and reflected into the actions carried out throughout UNEP.
- The EU and its Member States look forward to continuing our excellent cooperation with UNEP for the global transition to a low-carbon, resource-efficient and circular economy that doesn't waste resources, reduces its environmental footprint and achieves more sustainable consumption and production patterns.

Agenda Item 8: Future of the Global Programme of Action for the protection of the Marine Environment from Land Based Activities (GPA)

- The European Union and its Member States positively acknowledge the role that the Global Programme of Action (GPA) has played since 1995 to promote measures and highlight the importance for the global and regional agenda to deal with land-

based pollution. We also acknowledge that the GPA has been a forerunner in using and promoting a ‘Source to Sea’ approach.

- It is now time to ensure that this work can be adapted to today’s realities and ensure a viable future in the most appropriate manner.
- The future of the GPA is closely related to implementing UNEA-3 resolutions, in particular with regard to the work undertaken by the Ad-hoc Open-ended Expert Group on marine litter and microplastics with a view to define options for further work in this area, to be considered by UNEA-4.
- Although the outcome of the Expert Group and its consideration by UNEA-4 cannot be anticipated, the review of the GPA should be considered bearing in mind the need for consistency and complementarity in support of UNEA’s resolutions’ general orientations.
- We consider the timing of the 4th meeting of the Intergovernmental Review of the GPA (IGR-4) not ideal, pending the above-mentioned work streams. However, to take the maximum advantage of the meeting, the IGR should at least take a decision on a next firm step for its future set-up and its possible articulation in relation to UNEA-4, coming in March 2019.
- The IGR-4 should acknowledge that it should be explored whether UNEP and UNEA will be the appropriate fora to address issues

related to land-based pollution, since much of the work is already undertaken in this context (see Option C).

- We are also open to discuss the full integration of the GPA work into the regular Programme of Work of UNEP and combining relevant meetings with UNEA (see option B). Implications of this option will require, however, further clarification.
- In general, more clarification is needed, in particular on how duplication can be avoided and how the various options are related to the Programme of Work of UNEP and UNEA proceeding. This should include a consideration of advantages and disadvantages as well as costs of the different options.
- Currently, the presented options paper proposes various levels of structural integration of GPA's current work with UNEP and UNEA. However, it fails to consider the consequences for the continuation of GPA's activities.
- It would be helpful if UNEP could complement the note on the substantive elements, take stock of GPA's achievements and articulate options for activities and pollution areas that should be covered in the future, irrespectively of the structure. The considerations should also address the most efficient use of resources.

- Finally, the EU and its Member States are interested in views of other Member States and are willing to discuss the options and implications.

Annex 1

EU and its Member States comments

On the preparations for the 5th Annual subcommittee meeting; the draft Programme of Work 2020-2021 and the proposed Budget envelope

(Agenda item 6)

General

- The EU and its Member States (EU+MS) welcome the idea of a “retreat”-format at the Annual subcommittee meeting (ASC) to discuss implementation of the POW/B 2018-2019, as well as the draft POW/B 2020-2021.
- In general, we find it important to link the experience with implementation of the existing POW/B to improve the POW/B to be agreed.
- In that light we emphasize the importance of reporting, including on Programme Performance and the bi-annual Performance reports,
- However, improvements can be made in those reports to link implementation activities to concrete results achieved.

On the proposed Programme of Work:

- The EU+MS thank UNEP for the draft proposed Programme of Work 2020-2021. We believe it is a useful document to start the discussion. At this stage, we can only provide preliminary comments, as we will need more time to provide detailed comments to the proposed sections of this POW. For the next round of comments we would prefer to offer these in track changes in future versions of the document. It would be helpful if UNEP could provide us with a clear timeline of when comments would be expected.
- We welcome the POW is well structured and that the different subprogrammes bring together the relevant SDG-targets, UNEA-resolutions and expected accomplishments.
- We agree that it should be clear for MS how UNEP’s work contributes to the Agenda 2030 and UNEA resolutions in a coherent manner.
- We would welcome if the narrative in the introduction of the POW/B would reflect the important role of UNEP/UNEA for Agenda 2030 implementation (in line with the UNEA-2 resolution 2/5).
- It should also be made clear which role UNEP should play in the UN Development Reform, both financially and substantially. The POW/B should highlight how UNEP will integrate/cooperate their efforts to assist countries at the country level with regard to environmental protection within the new system of regional coordinators .
- Under the headline “stakeholders”, UNEP seems to be more focused on the private sector than civil society. UNEP needs to develop the justification for this in the document.
- In light of the 2030 Agenda we would also request to further highlight throughout the POW/B how gender aspects are taken into account. Only in the strategy section for the climate change subprogramme (p. 25) UNEP states that it will implement gender-sensitive actions and promote south south cooperation. We suggest to include a separate section for this, or include it in the section for the executive direction and management.
- The strategy section of each subprogramme should be strengthened to describe the main areas of interventions, how this relates to the key environmental issues to be addressed and how the different activities together contribute to the key objectives of the subprogrammes.
- On the addition of UNEA-resolutions to relevant subprogrammes:

- Could UNEP clarify the implication of the placement of a resolution under a specific subprogramme?
- Each subprogramme contains a table listing “UNEA resolution delivered through that subprogramme”. Can UNEP clarify what requests to UNEP in that resolution are included in the subprogramme? What does it imply for the many cross-cutting resolution that cannot be implemented through a single subprogramme (e.g. UNEA 3/4 “Environment and health” that contains section on climate change, biodiversity, chemicals and waste, etc.)
- Interlinkages and collaboration between subprogrammes could be further explored and elaborated in the document.
- It is important that the activities undertaken in the context of the POW/B are clearly described. At this stage it is unclear if and how ‘new’ activities, such as the BRI and GPE are covered in the POW/B. We would welcome more clarity on this. In several places the units of measures for indicators are clarified. This is very useful. However, we note that many indicators are mainly output related. We would welcome to work towards outcome related indicators whenever possible.

With regards to UNEP’s **results framework and POW indicators** :

- The EU + MS acknowledge the difficulty of attribution in the case of monitoring of higher level outcomes, impact and indicators. However, the EU + MS emphasize the importance for UNEP to demonstrate how their efforts contribute to these results measured and we believe that the indicators should be improved to achieve this, where ever possible:
 - Some of the indicators proposed in the POW are very general, do not depend solely on UNEP’s action and thus do not help to monitor UNEP’s impact (e.g. Increase in the proportion of countries in which environmental issues are addressed in national disaster risk reduction strategies). It could be useful that UNEP systematically add more concrete and specific indicators which would allow us to measure in a simpler manner what each subprogramme concretely does (e.g. Percentage of country requests for emergency response met by UNEP).
- It is relevant to follow up changes on country level, as proposed, however this need also be complemented with an analysis of attribution, or contribution, and preferably indicators at programme level in order to be able to follow up how UNEP’s initiatives contribute to the outcome or impact level indicator.
- Could UNEP clarify why, especially when they are quite similar to its proposed indicators, UNEP does not propose to use SDG indicators as indicators of achievement? It seems it would reduce the administrative burden and more directly link the POW to the SDGs, these should then be complemented by specific indicators that do relate to the effectivity of UNEPs work, as stated above.
- We welcome the sections describing external factors influencing delivery on the POW. We recommend that the strategy for each subprogramme includes an analysis on risks that would impede UNEP to achieve the expected accomplishments and what would be done to mitigate these risks (not only external factors).

On the budget

- In June we expressed our concerns with regards to the proposed budget envelope options. Unfortunately, our concerns at this stage remain and we feel we first need a better understanding of the consequences of the option proposed by UNEP in the document we discuss today.

- Regarding the allocation of resources, we strongly underline the importance to **work for a larger and broader donor base**, especially for the Environment Fund, to ensure **predictability and an effective delivery** of the programme of work we, as Member States, collectively endorsed (or will endorse and adopt). Therefore, we want to signal a **strong commitment to the Environment Fund**, while also keeping in mind past data and **maintaining realism, acknowledging the wish of donors to support special initiatives with earmarked funding**.
- We would like to highlight the ‘criteria’ or principles that the budget proposal should follow, including:
 - Sufficient ‘core funding’ of the POW
 - Transparency, i.e. clarity on what are considered ‘core activities’ of the POW to be financed by the UN regular budget and the EF, and which are related to earmarked funding or global funds.
 - Balancing Ambition with Realistic budgeting.
- Following these criteria, there should be a flexibility to adapt the proposal (or if other options emerge), also in light of the development of the result-based PoW.
- We underline the importance to have a transparent, inclusive and open preparation of the POW. The POW/B should clearly state what are considered core activities of the POW to be funded through the EF and what activities will be undertaken through earmarked funding. Increased transparency will assist MS to have a clear understanding what the POW is expected to deliver, as well to assess their contribution to the EF. We request that the next iteration of the POW/B clarifies this further.
- With regard to the proposed budget:
 - We think it would be useful to discuss a bit more how a right balance could be found between realism and ambition approach. A too ambitious target for the EF can be counter-productive for some donors but a too-low EF level might also be counterproductive by not motivating donors.
 - We would like to understand in more details the pros and cons and underlying motivation of the budget proposed, how this relates to the anticipated resources as well as the activities in the POW.
 - Can UNEP detail what are the risks associated with the proposed budget option of 910 million dollars? For example, the proposed decrease of the EF would mean a reduction of the VISC for each MS. It would thus entail a decrease in the contributions to the EF of some of the regular contributors who respect the VISC.
 - We suggest to organize a more indepth discussion between MS and the secretariat to discuss this more in detail on short notice.
- Can UNEP also provide more information on the “more flexible instruments and avenues” it is developing (paragraph 21) to encourage contributors to provide less tightly earmarked contributions.

We look forward to the further development of this POW and future discussions.