1) **UNEA and outcomes in general**

We applaud the UNEP upgrade towards UNEA since 2012 and are happy with stronger governmental commitments with this process on the global level. UNEA should be seen as the **Global Environmental Parliament**, which is agenda setting and using this strong mandate.

Nevertheless, there is a need to **increase the ownership of UNEA's outcomes** beyond Nairobi, linking its themes with existing regional and national processes, and increasing the relevance of UNEA's decisions for national environment policies.
"Taking UNEA home" should be one of the main tasks for member states and Major Groups. If UNEA is to fulfil its (political) function as an assembly, its resolutions should focus on changing the policies of member states together with the development of legal frameworks.

Therefore, the role of **UN Environment's Regional and Country Offices should be strengthened** to help facilitate the implementation of resolutions and encourage stakeholder involvement.

Related to the above points, there is a pressing need for a **monitoring framework** to measure progress on the member state level. This framework should be inclusive and enable inputs by Major Groups and Stakeholders, and yet be integrated into the 2030 Agenda Framework, to avoid overlap and extra structures.

We are therefore **concerned about the amount of resolutions adopted** until now and hope for a reality check to get them implemented - not only policy-wise but also budget-wise. We do not want to see the UNEA end up as a wishful thinking exercise but focused on effective implementation of policies to protect the environment and humankind. A better management of the process including division of tasks and better stakeholder engagement on all levels should be crucial for upcoming UNEAs.

To encourage policy coherence and the implementation of resolutions, we would urge Member States (MS) to **consider a multi-year theme approach**, which includes long-term planning. In close cooperation with the process of implementation of the 2030 Agenda for Sustainable Development (HLPF) and other UNEP-lead international processes.

2) **Meaningful stakeholder engagement at UN Environment Assembly**

Take the UNEA home!
For a better implementation, we need to strengthen awareness of the civil society organisations on the importance UNEA has, not only for the global level, but also for the national and regional follow-up and implementation

Engagement of Major Groups and Stakeholders is mainly limited to the UNEA meeting itself. We see less engagement in the preparatory meetings, like the CPR meetings. Unfortunately, we do not have liaison office for the Major Groups situated in Nairobi (as all other UN headquarters do have its permanent presence of MGs), and that makes the continuous and qualitative participation weak. The MGFC members are not living and working in Nairobi, and they do the representation work on top of their full time jobs.

Therefore, it is quite difficult to inform and mobilise major groups in the whole process. If member states are serious in expressing the importance of civil society groups, it has to go together with financial support. Not only for travel and hotel, but for being involved in the process from the start towards the end. On the national and regional levels we need to have those same organisations active, together with decision makers, in the developing and implementation of the right national/regional policies for UNEA's outcomes to become a success.

MGS participation at UNEA

We are grateful for the opportunities given to be consulted on meeting structures, processes and agendas, and we would like to stress the importance of good models of participation to be built into preparatory stages.

We feel the need as major Groups to speak in our own right, as well as under the Major Groups and Stakeholders (MGS) umbrella. Meaningful engagement should not only be reduced to technical and expert opinion and analysis, but also recognize grass-roots perspectives and experience.

UNEP should take care of room allocations, ensuring space for MGs to meet amongst themselves, and to participate fully in meetings such as resolution drafting committees.

Opportunities for side events should be given a priori to Major Groups, as they do have limited spaces elsewhere to inform about best practices, give critical views, or exchange knowledge about methodologies related to the agenda.

We would also consider the Business Policy Science Forum to be transformed again to a Policy-Science Forum, with a main focus on policymaking and science for the public interest.

3) Our conceptual framework for sustainable production and consumption

Our current global economic model is causing global environmental degradation, which takes a heavy toll on human health and ecosystems, and which acts as a barrier to the attainment of sustainable development.

Humankind is currently using 1.7 Earths per year, we use more natural resources than the Earth can regenerate, and emit more carbon dioxide into the atmosphere than its systems can absorb. The extraction of primary materials has more than tripled in 40 years. Highly industrialised countries contribute massively to resource depletion and waste generation.

Addressing this model will require more than technological innovation alone. It will require profound societal change, driven by innovation that utilises both new technologies and the knowledge and experience of those societies whose participation and support that change will depend on. The economic and developmental diversity of our world also underscores the importance of **grounding societal innovation** on the knowledge and needs of local communities.

Current patterns of production and consumption often reinforce inequalities: it is often the poor and marginalised who suffer more from environmental degradation and the detrimental health effects of pollution. The large scale exploitation of natural resources or the production of raw materials often undermines the livelihoods of local communities. Sustainable consumption and production can therefore not be achieved by innovation only but has to be based on a redistribution of wealth and equal access and rights over natural resources.

We need a **new narrative on human well-being and development**, which goes beyond the paradigm of infinite GDP-growth and the consumerism.

4) Sustainable production

Aall economic activities use natural resources and/or emit waste or GHGs. Fossil fuels are still the main base for any production and the main source of CO2 emissions. As we have to deal with planetary boundaries, there is no escape from regulation of the use of those resources and limit as much as possible waste and GHG emissions. We need to make transition from fossil fuels to renewables.

The following **instruments and principles** are needed to achieve sustainable production:
- Taking the 'good governance' principle seriously and ensuring comprehensive involvement of environmental authorities, stakeholders, and the scientific community
- Enforcing all the existing agreements and resolutions
- Implementing clear regulations, legal frameworks and rule of law, corporate and governmental accountability and transparency
- Implementing environmental protection strategies to decrease the total environmental impact of a product, such as Integrated and Extended Producers Responsibility schemes, by making the manufacturer responsible for the entire life-cycle of the product and especially for funding the take-back, recycling and final disposal. E.g. producer of technological devices (such as mobile phones, electronics) has to fund the system of collecting and recycling of old devices.
- Redefining the shareholder value law/regulation to avoid production based on 'maximising profit' and instead promoting production based on 'societal benefit and environmental benignity'.
- Applying the precautionary principle. This means a stronger regulation of the market: banning environmentally damaging products from entering the market in the first place, if there is no sufficient proof of their compatibility with environmental regulation. "No data, no market"
- Internalising social and environmental costs (at the source), and applying fair pricing

- Using financial instruments - tax shift from labour towards natural resource use and introducing global environmental taxes, such as, the border adjustment tax to tax products from those countries that do not limit their GHG emissions entering those countries that try to fight climate change
- Level playing field: high ambitions, no double standards between developed and developing countries

Moving towards a **Circular Economy** that must be toxic-free and fossil-free (absolute decoupling of economic growth and raw-material usage and moving from efficiency towards sufficiency). This transformation is measured and enabled through:
- Energy and resource management at all levels of production
  - a defined set of indicators monitoring their use;
  - Promotion of the development of full and standardised life cycle analyses to assess environmental performance and develop corresponding indicators of products, services and new technology developments; this should be facilitated through guidelines, training and public domain software
  - Development of guidelines to develop a standardised 'Material flow analysis' that will consider a total material footprint, including extraction phase and related unused material
  - Sector strategies associated with targets for resource productivity and circularity
  - Reporting of company level indicators (resource productivity and pollution intensity) as a tool for monitoring the environmental performance of enterprises
  - Preferring products with certain safely recycled content over products from primary raw materials (through green public procurement or other measures)
  - Standardising products, setting up minimum environmental criteria for products, including information on the products and the implementation of the right to know principle
  - Mainstreaming resource efficiency and eco-innovation in national SME support strategies and programmes including financing mechanisms

Maximising the prevention of waste. Promoting the waste hierarchy, starting with prevention (including through refuse and redesign), reduction, reuse, recycling – recovering:
  - There is a need for clear common definitions of waste and recycling practices
  - Change concept of 'waste' to 'resources' as a way to enable circular economy strategy and develop industrial symbiosis.
  - When waste is recycled, workers shall be protected from exposure to hazardous substances, and recycled products shall be free from toxic substances.

Example 1: Plastics
Despite the attention gathered by the 'plastics crisis', the global rate of the production of plastic is growing. Better waste management systems and recycling will not be sufficient to address plastic pollution. We call on countries to limit the use of single-use plastics and the overall production of plastics. This can be achieved through measures such as: better regulation to phase out avoidable single-use products, minimization of packaging (through

taxation) and promotion of products in bulk-packaging free, increase the recycling content in plastic products and consider including use of bio-based materials from waste resources (e.g. crop residues, avoiding land competition between food and crops for bioenergy or bioproducts).

More and more people do have concerns about microplastics, and therefore we need new productional and material solutions to avoid microplastics from wear and tear of car tires, paints, cosmetics and technical clothing.

At UNEA-4 countries should finally adopt a mandate for the creation of a new and effective multilateral framework on plastic pollution.

If we are serious about curbing plastic pollution, then we should implement several **concrete measures immediately**:

- Start a phase-out of disposable containers that are only used once before they are thrown away.
- Forbid the intentional use of tiny microplastics particles in all products, e.g. in cosmetics, paints, and detergents.
- Forbid the use of so-called oxo-degradable plastic bags, because in practice they are also a source of plastic fibres that get into soil and waters.
- Introduce refund systems for all plastic products to encourage proper recycling.
- Put a tax on plastic raw materials and prevent the loss of plastic pellet raw materials into nature in cooperation with producers.
- Make sure that producers take responsibility for the environmental sustainability of plastic products, e.g, by developing washing bags for fleece and other technical clothing so that the microplastics are collected in the washing machine and do not get into waste water.
- In cooperation with producers, work towards making plastic material more recyclable by having less variety of plastics and less degradation of materials in recycling. E.g., white plastic bottles can be recycled more times than colourful ones.

Example 2: Food and agriculture
Since intensive livestock systems are at the heart of -or contribute to - many problems affecting health, food security, climate change, environmental damage and animal welfare, we require sustainable food systems. We need to:
- Re-establish and improve existing sustainable ways of production (Global South) instead of the promotion of large-scale farming
- promote production systems using closed cycles (circularity, agroecology, organic agriculture), and which treat animals ethically
- make our food systems resource-efficient by encouraging the reduction of meat and dairy consumption, using organic fertilisers (e.g. manure, other by-products), using biobased products (e.g. biopesticides, etc.), crop rotation to promote nitrogen and carbon cycles
- promote small-scale production, thereby improving the livelihoods of the rural population, food security and even economic development as opposed to industrial farming,

- eliminate environmentally damaging trade practices (livestock fed by imported soy or palm oil causing deforestation, pollution of water, products containing unsustainably sourced palm oil etc.), and subsidies for environmentally damaging production methods (fertilizers),
- minimize the amount of packaging used for the production of food and provide a clear and honest labelling with information about environmental footprint and method of production,
- avoid putting patents on living organisms such as seeds, promote seed exchange among farmers instead,
- establish independent training and extension services for farmers and processors on sustainable production methods.
- To ensure safe reuse of wastewater, agricultural pollution of water sources has to be halted at the source, by fully closed cycles and transition to agro-ecological practices that exclude synthetic pesticides and fertilizer

5) Innovative solutions: more than technical fixes, focus on Societal Innovation

Innovation is not just the design and production of new things, new products or new means of consumption. **Technological or product innovation alone will not decouple us from the excessive resource use that breaches our planetary boundaries.** Innovation is not a panacea or magic bullet. Nor will innovation alone lead to the social and economic changes that humanity desperately needs: comprehensive societal innovation that engages all stakeholders, and at all levels, and which identifies and utilises the best existing historical or cultural practices, as well as looking to the future. Even where innovation is limited to new technologies, it must not be restricted to new products, but must also address how they are produced, and their entire lifecycle.

Societal **solutions must be built from the bottom up, making use of local and indigenous knowledge, and built through meaningful engagement and the development of trust**. There are no easy solutions. Advocating novel solutions to environmental challenges should proceed on the basis of a simple test:

- Firstly, does the innovation harm the environment, now or in the future? (precautionary principle)
- Secondly, does it benefit society as a whole, and not create or exacerbate inequalities?
- And finally, does your proposed approach already exist? If so, first apply transfer of technology to the groups needed, and/or upscale it via policy measures and/or financial investments.

Furthermore, it is not enough just to identify and promote an idea without also addressing the societal conditions or infrastructure that it needs to flourish. We require holistic approaches, informed by and sympathetic to the local context, and not quick fixes and magical thinking.

6) Partnerships

We recommend that UNEP partnerships should be based on principles including
- Ambitious transformative and clear goals
- Transparency and full disclosure of investor relations
- Truly environmentally & socially sustainable
- Fair power relations between partners

Unequal distribution of political power is often problematic in partnerships, e.g. between global corporations and small businesses. Less financially powerful partners need to be given an advantage point, and supported by UNEP e.g. by creating larger groups, supporting financially intermediate organisations such as EREK network (European Resource Efficiency Knowledge Centre).

At UNEA-4 positive partnership development activities could include a matchmaking for innovative social environmental start-ups/initiatives. Focus on socially responsible start-ups and local businesses that are in-line with SDGs. We should extend the EXPO to a great matchmaking marketplace to bring start-ups in connection with impact investment funds.

7) UNEA's leadership on environmental justice

The Global Pact for the Environment (GPE)
While we welcome the proposed Global Pact for the Environment, we view it as both a risk, and an opportunity. The norms and principles that form the bedrock of international environmental law have been hard fought. In line with the principle of non-regression, it is vital that these standards are not watered down to the lowest common denominator in a new and legally binding instrument. The global political climate is not conducive to the progressive codification of the law at present, and both UN Environment, and those states committed to the project should provide undertakings that they will fight any weakening of the norms that so many depend on. The process towards the Pact should be based on majority voting, and not the consensus model, even if this requires a longer road to universalisation. Space for civil society in any process towards the Pact should be guaranteed, and should mean meaningful procedural and substantive engagement throughout. The issue that only ECOSOC accredited, and not UNEP accredited civil society groups can participate, should be resolved as soon as possible. We are ready to engage in negotiations towards the Pact and have high expectations for its outcome.

Environmental security
We welcome the leading role that the EU and regional Member States continue to play in promoting environmental security themes at the UN Security Council, and in their development and assistance policies. For countries affected, whether this is managing conflicts over resources, addressing the direct environmental damage caused by hostilities, or the collapse of the state's capacity for environmental governance and oversight, the consequences for people and ecosystems can be profound. Technological and policy innovation are vital for addressing environmental security. New tools and methodologies for the remote collection of environmental data in insecure settings are already informing humanitarian and environmental response, while innovative approaches to the sustainable and equitable management of natural resources offer potential for building and sustaining

peace. UNEA has emerged as a leading forum for addressing the environmental dimensions of armed conflicts, and UNEA-4 is an opportunity to showcase innovative approaches for addressing the resilience and environmental security of communities.

Environmental defenders
In situations of environmental conflict, such as those over mining, **environmental defenders are placed at risk**. Nearly 200 environmental defenders were killed in 2017 - and the annual death toll has risen fourfold since civil society and the media began compiling data in 2002. Many more environmental defenders suffer from threats, defamation, strategic lawsuits against them or simply cuts in funding or restrictions on the receipt of funding. We **welcome UNEP's recent efforts to support environmental defenders** and call on governments to ensure the safety of those fighting to safeguard the environment and environmental rights, and to provide an enabling environment for their activities.

Concretely, it is alarming that many countries are using different versions of "anti-terrorist legislation" (or anti-development) **to prevent environmental organisations from accepting donations from abroad or even speaking up on behalf of the environment**. UNEP should negotiate a resolution to discourage member states from enforcing this kind of legislation on environmental grounds.