



Distr.: General
4 January 2019

English only



United Nations Environment Assembly of the United Nations Environment Programme

**144th meeting of the Committee of Permanent Representatives
to the United Nations Environment Programme**
Nairobi, 8 January 2019
10:00 a.m. to 1:00 p.m. and 2:30 p.m. to 5:00 p.m.
Conference Room 1

Agenda Item 7: Consideration of resolutions adopted at the third session of the UN Environment Assembly

UNEP/EA.2/Res.10 “Oceans and Seas”

Annexed is are responses from the Secretariat on comments received from member States on previous versions of UN Environment Programme’s draft Marine and Coastal Strategy for the implementation of UNEA-2 Resolution 2/10: Addressing water pollution to protect and restore water-related ecosystems (UNEP/EA.2/Res. 10).

UN Environment Programme's Marine and Coastal Ecosystems Strategy - Revision 12

Comment Tracking - written comments from Member States and amendments made **03 January 2018**

	Comment	UN Environment Programme's Response
	<i>EU & EU member states</i>	
1	We welcome the draft strategy. We understand that this is a very first draft of a Strategy, which would need to elaborate a structural framework, so that it can be read clearly:	There has been significant amendment to the structure to gain the clarity as recommended
	<i>what the basis is,</i>	Section 4 " <i>The basis for action</i> "; new content added
	<i>what the existing strategies are and the expected outcomes</i>	Section 4.2 " <i>UN Environment Programme's framework that guides the Strategy</i> " makes explicit references to the Medium-Term Strategy (MTS) 2018-2021 and Programme of Work. Section 8 " <i>The theory of change towards ocean-based sustainable development</i> " and Section 9 " <i>Strategic delivery and core outputs</i> " explain the expected outcomes. Content from Section 5 in the previous version was incorporated in this section, augmented with new content
	<i>how the implementation frameworks can be used in that context and</i>	This has been addressed in multiple sections under Section 4 " <i>Basis for action</i> " where this is explained in sub-sections 4.1 " <i>External frameworks that guide the Strategy</i> " and 4.2 " <i>UN Environment's framework that guides the Strategy</i> ". This is further elaborated in Section 7 " <i>The implementation framework</i> " that explains how global to regional to national frameworks will be used to channel strategic implementation
	<i>how the implementation of the Strategy would be monitored</i>	A section 12 " <i>Monitoring and reviewing the strategy</i> " is included
2	Given the urgency regarding the degradation of marine ecosystems, a short-term strategy for improving the marine ecosystems is crucial. The report currently notes: "UN Environment aims to be a driving force to ensure that in 50 years' time, marine and coastal ecosystems are healthy, thriving, and resilient to a wide range of human impacts, including as a result of our changing climate." Hence, such a long-term approach should not neglect shorter-term actions.	The revision makes more explicit the alignment with the 2030 Agenda; hence a timeline of 2030 compared to the previous 50 years; made. This is outlined in the "Introduction" section The section 9 " <i>Strategic delivery and core outputs</i> " makes very specific references to the key outputs and what will UN Environment do in its strategic implementation – actions that are already being undertaken and what will continue within the time span of the strategy.
3	The report could have a stronger linkage between the potential role of UNEP and the blue economy, given the challenges we globally face in this respect.	This is made explicit in the section 4.2 " <i>UN Environment Programme's framework that guides the Strategy</i> ", specifically under Strategic Objective 4

	Comment	UN Environment Programme's Response
4	It is crucial to note that an Oceans strategy needs to be inclusive with respect to all current initiatives, in order to create cross-benefits and an inclusive strategy	An account is given in section 4 " <i>The basis for action</i> " and the following sub-sections and under the " <i>Implementation framework</i> " where these linkages are made. These are further elaborated in the "Strategic delivery and core outputs" section
5	The text regarding stakeholder engagement is still guide vague and would benefit from further elaboration	This follows the comment above; refer to content in section 10 " <i>Partnerships</i> "
6	We would like UNEP to clarify in what form will it be presented to the UNEA4 for decision, and what are the next steps?	A timetable on the process and steps
7	We would also appreciate further explanation how this draft would be interlinked with the draft UNEP PoWB.	This has been specified under the section 4.2 - " <i>Medium-Term Strategy (MTS) 2018-2021 and Programme of Work</i> "
8	Given the mandate of UN Environment and well identified problem of 'all indicators of ocean sustainability are in the red' (p.9), when identifying challenges and drivers for change, it would be important to elaborate further on pressures and emerging challenges.	It was determined that section 2 " <i>Challenges and drivers of change</i> " should be very succinct as these are already well elaborated in existing documentation. Investment is hence concentrated in the document on the strategic approach to address the challenges
	The UNEP is best placed to play an important role in addressing the conservation and addressing of pressures to create conditions for a sustainable blue economy	
	Clear identification of the mandate of UN Environment would be also useful in the context of UN Oceans (challenge quoted under 5. at p. 9). The role of other UN Agencies (FAO, RFMOs, etc.) could perhaps be expanded somewhat	
9	The document is welcomed by the EU+MS, especially its integration of the Source-2-Sea approach.	The Source-to-Sea approach is further elaborated in section 5 " <i>The strategy guiding principles</i> " and in section 9 " <i>Strategic delivery and core outputs</i> "
10	On Our Common Ocean: Strengthening the Regional Ocean Governance Framework, section 5.1 should also in the bullet points on page 10 address that the regional seas framework also provides an important setting for work on marine litter and other pollution.	This is strengthened under sections 7 " <i>The implementation framework</i> " and 9 " <i>Strategic delivery and core outputs</i> ". The pollution linkages are further captured in the section "The implementation framework"
11	Recognizing the role of Regional Ocean Governance is important and identifying the vision of strengthened support to coordination of Regional Seas Programmes and Action Plans (RSCAP) would clearly need to be elaborated. Ideas for further policy-interactions with RFMOs and LMEs are welcome, however, it would be important to have a clearly identified vision of the expected outcomes in coordination and implementation of RSCAPs to start with.	The role of the Regional Seas Programmes is contextualized in the section 6 " <i>UN Environment Programme's comparative advantage</i> ". This is carried through the follow-on sections.

	Comment	UN Environment Programme's Response
12	Chapters on MPAs, Marine Pollution, Marine Ecosystems and Protection of Marine Biodiversity and Addressing Pressures (be it climate change, fisheries etc) would need to be elaborated and clearly interlinked with expected outcomes, while relying on the existing implementation frameworks.	This is strengthened under sections 7 <i>"The implementation framework"</i> and 9 <i>"Strategic delivery and core outputs"</i> .
13	On Marine pollution, section 5.2: here it would be important to address not only waste pollution, but also other sources such as eutrophication, hazardous substances and include e.g. conventions dealing with these issues.	This is captured in section 9.2 <i>Strategic Objective 2: Circular economy and sustainable consumption and production solutions, including mitigation of pollution</i>
	In this section the references to the UNEA initiative Beat Pollution is absent. This initiative as also of importance for the marine environment.	Captured under the section 11.2 <i>"Communication with the public and awareness-raising"</i>
	Also the reference in the bullet point to the "Ad Hoc Open-Ended Expert Group on Marine Litter" is incorrect. This Ad Hoc group is not working under the mandate of GPA.	removed reference
14	On climate and Ocean nexus, section 5.3.1: In general, we are positive towards exploring the nexus. When dealing with UNFCCCs mandate and implementation of NDCs, it is important to use existing UNFCCC systems for measuring, transparency and verification and not create separate systems.	This has been reformulated under section 9.1. <i>Strategic Objective 1: Enhanced Science-Based Understanding of Drivers Impacting Ecosystem Health and Services - Scenarios on ecological, socio-economic and climate-related drivers</i> and under section 9.3 <i>Strategic Objective 3: Effective governance and integrated management of drivers impacting marine and coastal biodiversity and ecosystem services -- Nature-based climate change solutions"</i> . The language references building on work under the UNFCCC
15	The report seems to make (or forgets to make) certain random references to other procedures. For example, in 2.2 a reference to the UN ICP is not taken into account, whereas under section 3 a reference to the "Washington declaration" is not included and in section five a reference to the BBNJ is excluded. Hence, the report seems to neglect several important elements or processes (GPMN, GPW, IMO strategy on CO2 reductions, etc.).	The redraft attempts to better capture the pertinent references to these processes and frameworks within the context as presented
16	An important chapter on assessment of the status of marine environment (including the references to all the substantial issues) is missing, there is only reference on Environmental Economics and Assessment and valuation. However, in order to be able to guarantee both conservation and sustainable use, the quality assessment of the status of marine environment should be facilitated in sea-basins and obviously, the linked resource mobilisation would need to be strategically foreseen.	This is elaborated within the section 9.1. <i>Strategic Objective 1: Enhanced Science-Based Understanding of Drivers Impacting Ecosystem Health and Services</i> where the discussion is expanded beyond the reference to Environmental Economics and Assessment and valuation.

	Comment	UN Environment Programme's Response
17	In the text, a reference to the Convention on Wetlands, the Ramsar Convention needs to be done in this draft strategy. Although, it is not an UN convention, there are many designated sites under this convention in, or extending into the marine environment (areas not over 6 m depth at low tide). The IWC is mentioned, for example.	We may need to look extent to which conventions CBD, UNFCCC, UNCCD and the Ramsar Convention are listed and provisions that are cited to make relevance – but could be a very expansive list ---- guidance needed
18	The role of UN Environment should be elaborated against the implementation framework available within UN Environment for ocean- and seas-related issues and in particular RSCAP, therefore, marine and coastal focus is very important.	Contextualized in the section 6 “UN Environment Programme’s comparative advantage” and in the follow-on sections; references to the RSCAPs are strengthened
20	page 6: “An illustration of such gathering is the UN Ocean Conference, a series of meetings to be held every three years from 2017 to 2029 to review progress on SDG 14. The commitment-heavy annual Our Ocean Conference is another which brings together governments, private sector, non-governmental organizations, academia and UN agencies.” o EU+MS comment: We would suggest that the strategy also comport a reflexion on the adequacy to maintain those two parallels processes that both imply commitments in favor of ocean sustainable use and conservation	Opted to remove the reference in that context. The reference to commitment is mentioned in the section 2.2 “Growing ambition to toward ocean sustainability” without mentioning the OOC. There is acknowledgement through the document of the multiplicity of engagements on ocean conservation. It would be difficult in the main document to try to make an exhaustive review; the question would be why mention initiative over another. This type of mapping should be reserved for an annex
21	page 7: “The opportunities listed above are some of the many that can help curb the environmental and governance challenges facing the ocean. To further enhance an effective and comprehensive ocean and coastal management, there is a need for each actor to define their role in the ocean space.” o EU+MS comment: This paragraph does not seems very clear about the “opportunities” it refers to. Furthermore, it does not concern only the Blue Economy but the ocean policies and governance as a whole, so maybe it should be displaced to the introductory part.	Tried to be more specific in the later sections of the document
22	page 7: “the World Bank announced the creation of ‘PROBLUE’ a multi-donor trust fund to support SDG14, addressing marine pollution, overfishing, coastal erosion and sustainable growth of coastal economies” o EU+MS comment: the funding windows of ProBlue quoted here are approximate. We suggest to replace them by the official ones : improving fisheries governance, addressing marine litter and pollution, blueing of traditional sectors and supporting new economic activities and supporting integrated seascape approaches	Opted to remove the reference; refer to section 9.4. <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i> for narrative on issue
23	Page 7: o EU+MS comment: One point could be added on the WestMED initiative, that gathers 10 states of the West Mediterranean basin in a common governance to support and implement blue economy projects in the region.	This could be a detailed mapping in an annex rather than stating in the main document

	Comment	UN Environment Programme's Response
24	Page 15: o EU+MS comment: A mention of the UN Decade of Ocean Science for Sustainable Development (2021-2030) could be added to mobilize the scientific community, policy-makers, business and civil society around a program of joint research and technological innovation.	References made under section 9.1 <i>Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services</i>
Canada		
1	Section 6 of the draft Strategy addresses the various roles and responsibilities in addressing marine pollution. Suggestion to instead focus on roles and responsibilities in implementing the UNEP strategy, which is the main subject matter. In particular, section 6.1 would benefit from clearly outlining how UNEP is going to implement the strategy, i.e. process timelines, reporting back to Member States and reviewing.	This is compiled in the sections from section 7 <i>"The implementation framework"</i> onwards. The review and report-back is in the section 12 <i>"Monitoring and reviewing the strategy"</i>
2	Clearer, more explicit link to the Program of Work and Budget could be made	Elaborated in section 4.2 <i>"UN Environment's framework that guides the Strategy"</i>
3	Editorial changes: Page 11 –should state: <ul style="list-style-type: none"> o Ocean Plastics Charter o G7 Innovation Challenge to Address Marine Plastic Litter • Page 12 – small edit: 'supporting member states.... 	Removed these references; details may be placed in an annex
4	Editorial edits Annex 2: Page 2 – Revisions to statement on Ocean Plastics Charter point should state: <ul style="list-style-type: none"> - o Ocean Plastics Charter - in 2018 at Charlevoix, G7 members (Canada, European Union, France, Germany, Italy, United Kingdom) committed to take action toward a lifecycle management approach to plastics in the economy. In addition to these original signatories, Jamaica, Kenya, Mexico, Norway, Republic of Marshall Islands, Netherlands, Senegal, Nauru, Palau, and Cabo Verde, as well as 20 companies including Unilever, Ikea, Nestlé and Volvo, have also endorsed the Charter as of December 12, 2018. The charter includes specific targets and goals. 	Removed these references; details may be placed in an annex
5	Editorial edits Annex 2: Page 2 – Information about Innovation Challenge should state: G7 Innovation Challenge to Address Marine Plastic Litter – aims to incentivize the development of innovative social or technological solutions for a more sustainable management of plastics throughout their lifecycle in order to increase resource efficiency and to reduce marine plastic pollution including by finding innovative ways to enhance waste management of plastics that may become marine litter.	Removed these references; details may be placed in an annex

	Comment	UN Environment Programme's Response
	<i>United States of America</i>	
1	UNEP has not been tasked with an overarching coordinating role for all ocean activities, e.g. shipping, fishing, etc.	Acknowledged; adopted language that address this impression. Confined this to areas related to ecosystem management
2	We suggest as a preliminary step UNEP take stock of its programs, strengths, mandates and determine how it will best utilize these to achieve its mission.	Acknowledged; an elaboration of this will be best placed in a supplemental annex.
3	On assessing the marine environment, the paper notes that UNEP will focus on the regional seas based state of the coasts or marine environment, including integrated marine ecosystems assessments, and we would like to better understand this approach to confirm this work would complement rather than duplicate the work of the WOA.	The approach regarding the Regional Seas Programmes is outlined in section 6 “ <i>UN Environment’s comparative advantage</i> ” and followed in sections 7 “ <i>The implementation framework</i> ” and 9 “ <i>Strategic delivery and core outputs</i> ”. The linkages with the Regular Process and WOA is captured under section 4.1 “ <i>External frameworks that guide the Strategy</i> ” and section 9 “ <i>Strategic delivery and core outputs - Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services</i> ”. The language is contextualized to complement the work of the WOA.
4	Some of the described work might fall within the mandate of other organizations, such as FAO (for example, “assess and explore measures to reduce negative environmental impacts, particularly from trawlers and industrial fishing efforts from the perspective of the impacts on the bottom ecosystems and by-catch”).	The language has been modified to speak more to UN Environment's mandate and role around ecosystem services.
5	Annex 1 and 2 should be statements of fact describing programs or conventions and not make judgements about amount of time to undertake work (e.g. EBSAs), whether an issue is within a mandate (e.g. IWC), etc.	Need to re-look at annexes; for moment focus on main document
6	The strategy should provide a higher profile for science, products and services as a foundation for ocean governance, management, blue economy and sustainable development;	The document has been restructured to specify more concretely the outputs; captured in section 8 “ <i>Theory of change</i> ” and section 9 “ <i>Strategic delivery and core outputs</i> ”
7	The strategy should more extensively consider how UNEP partners with other organizations outside the UN.	A “ <i>Partnerships</i> ” section 10 has been added; but not very explicit – need to reflect on how more specific we need to be – consideration of a mapping in an annex
8	A decadal strategy of this magnitude should affirm UNEP’s participation in the UN Decade of Ocean Science for Sustainable Development. The decade arc reaches from science, observations, data management, modeling, governance, science informed policy making, enhanced blue economy, jobs growth, and sustainable development.	This is contained in the section 9 “ <i>Strategic delivery and core outputs</i> ” under “ <i>Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services</i> ”

	Comment	UN Environment Programme's Response
9	2.1 The Ocean Faces Multiple Challenges: Page 6: Non-UN entities should be removed from the chart (e.g. Arctic Council is not a UN body).	Removed
	2.3 Mobilization around the Concept of the 'Blue Economy': The UN FAO launched the "Blue Growth Initiative" in 2013, which focuses on capture fisheries, aquaculture, ecosystem services, and trade and social protection. UNEP should ensure any future work takes into account existing programs throughout the UN system such as these and does not duplicate their efforts or encroach upon their mandate. http://www.fao.org/policy-support/policy-themes/blue-growth/en/	
10	3. Transformational Leadership- the UN Environment Mandate: Suggest deleting this text (Page 8, 3rd paragraph): "Former Executive Director Achim Steiner commented upon his departure that he had a "deep sense of regret of not having been able to make UNEP part of putting a greater focus on the ocean and marine agenda. I think it was probably the biggest mistake I made..."	Removed
11	UN Environment Niche: Suggest this may be overstating the case (Page 9, 1st paragraph): "Indeed, UN Environment is often perceived as having a diminished role compared with other agencies and organizations both inside and outside the UN system particularly when it comes to ocean issues."	Removed
12	Page 9, 2nd paragraph: We agree UNEP should ensure its work is integrated into cross-cutting conversations such as those happening in the BBNJ intergovernmental conference, but should be cautious not to get ahead of those negotiations, or pre-judge any outcomes	Removed that reference... guidance on whether something should be included on the topic?
13	Page 9, 4th paragraph: "...coherent platform with four strategic work streams..." Please clarify the four work streams; are they reflected in 5.1, 5.2, etc?	Major overhaul in the approach taken in revision: This has been reorganized in this draft around 'strategic objectives' which attempts to capture the essence of the 'work streams' but cast at a higher level. This framework is in a new Theory of change, that is further elaborated in the section 9 " <i>Strategic delivery and core outputs</i> " that follows.
14	5.1.1 Supporting the regional networks of Marine Protected Areas: Suggest acknowledging UNEP is not the only organization that supports the development of regional MPA networks (LMEs, CEC, EU and others also involved).	The general language suggests the partnership approach in execution of the mandate.

	Comment	UN Environment Programme's Response
15	It would be helpful to distinguish between regional networks of MPAs (which should include science-based information such as connectivity and representativeness) and regional networks of MPA managers, who focus on issues like management effectiveness.	Is this required in a strategic document?
16	5.2 Increasing Ambition in the Battle against Marine Pollution: UNEP is referring to applying the 'reverse listing' approach used for sea-based sources of pollution, such as in London Dumping to land-based sources. Most of the land-based pollution to the marine environment is due to a lack of capacity, infrastructure, etc. to address pollutant sources (especially solid waste, nutrients and wastewater). Moving towards banning these pollutants from entering the ocean is out of step with the reality of how this could be done. A better approach would be to recognize the key sources (as per the GPA priorities or all nine source categories) and determine how to continue to address them.	Removed this reference; this is more operational and indeed an option of the suite of recommendations that may be followed. This will warrant further implementation feasibility analysis. The approach with the GPA and priority focus is captured in the sections 6 " <i>UN Environment's comparative advantage</i> ", 4 " <i>The implementation framework</i> " and 9 " <i>Strategic delivery and core outputs</i> " under " <i>Strategic Objective 2: Sustainable consumption and production solutions, including mitigation of pollution</i> "
17	Page 11, Paragraph 2: "...securing the aims of UN Environment's Clean Seas campaign..." Most member states are not part of this campaign and thus it is too narrow to list as a goal. A better goal would be on achieving reduction of key pollutant sources into the marine environment.	Referenced under the section 11 " <i>Communications</i> "; the substantive material is under the " <i>Strategic delivery and core outputs</i> " section
18	5.3 Ensuring Healthy Marine Ecosystems and the Protection of Marine Biodiversity: UNEP should be careful of directing the Convention on Biological Diversity's work areas.	Noted; refer to section 9.3. <i>Strategic Objective 3: Effective Governance and Integrated Management of Drivers Impacting Marine and Coastal Biodiversity and Ecosystem Services</i>
19	5.3: Bullets: Many of the projects under these bullets are unclear and do not distinguish how the work will be different from similar, existing efforts. UNEP should work to clarify these proposals and ensure any new activities take into account existing efforts. Specifically with regard to bullet four, we strongly encourage UNEP to focus on areas within its mandate. If a project related to fisheries is undertaken, UNEP should coordinate with FAO to ensure its complementary to ongoing efforts in fisheries.	Overall addressed in the revised formulation of the document; mainly between sections 8 and 9 to lend greater clarity
20	5.3.1 Addressing the Climate-Ocean Nexus: The reference to nature-based adaptation measures could be strengthened and expanded in chapter 5.3.1.	Has been expanded under sub-section 9.3 " <i>Strategic Objective 3: Effective governance and integrated management of drivers impacting marine and coastal biodiversity and ecosystem services</i> "; there is a specific discussion under " <i>Nature-based climate change solutions</i> "
21	There could be a new paragraph related to building on the ocean observations of other organizations as a foundation for informed, science based management.	Addressed under sub-section 9.1 " <i>Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services</i> "

	Comment	UN Environment Programme's Response
22	Would be useful to mention the World Meteorological Organization and UNFCCC. Also request clarifying that this is not duplicating the work of other organizations.	Consideration of the institutional mapping in an annex
23	5.3.2 Ensure sustainable provision of ecosystem services by critical coastal and marine ecosystems: This section could include a component on communicating the value of coastal ecosystems and green infrastructure to policy-makers and government officials to demonstrate the financial benefits healthy and functioning coastal ecosystems can offer (through storm protection, resource harvesting and cultivation, tourism, etc.).	Section 5 <i>Strategy guiding principles</i> attempts to make the conceptual linkages that underpin the work in general as elaborated under the <i>Theory of Change</i> (section 8) and the strategic objectives that follow under section 9. The element of 'communication of benefits' is considered an embedded aspect across the work areas, though there is a section on communications (section 11) that is crafted as a cross-cutting service delivery
24	5.3.3 Addressing Fisheries Impacts on the Marine Environment: The first sentence makes an assertive and uncited claim about the impacts of fisheries and aquaculture. The rationale for this claim should be cited or it should be deleted.	Reference removed
25	The UN FAO and its Committee on Fisheries is the global forum with competency over fisheries issues. As such, many of the areas outline in this paragraph are outside UNEPs mandate (e.g. trawling, bottom ecosystems, by-catch, regional fisheries bodies, fish stock assessments, and fisheries value chains and trade policy). UNEP should review its mandate and the decades of ongoing work the UN FAO, Regional Fisheries Management Organizations (RFMOs), as well as other places within and outside the UN system to address the environmental impacts of fisheries. When revising this work area, UNEP should avoid overlap with other UN agencies mandates, focus and clearly articulate any efforts related to fisheries, and revise focus on cooperating with those existing efforts, rather than conducting new work outside its mandate.	Clarity offered on potential for overlapping mandates offered under Section 9.3. <i>Strategic Objective 3: Effective Governance and Integrated Management of Drivers Impacting Marine and Coastal Biodiversity and Ecosystem Services</i> ; confining to areas of 'comparative advantage' and mandate. Specified collaborations and complementarities in work.
26	5.4 Sustainable Ocean financing – Investments for Healthy Marine and Coastal Ecosystems: UNEP should focus any business models for sustainable production and consumption on areas within its mandate.	
27	5.5 Science Policy Interface: Pleased to see this section introduce a science-based assessment/policy approach.	Noted; in section 9.1 <i>"Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services"</i>

	Comment	UN Environment Programme's Response
28	This section recognizes the World Ocean Assessment and UNEP's contributions to it, but suggest including similar recognition for the UN Decade of Ocean Science and confirm there is no overstepping of UNEP's mandate versus the mandates of other organizations like the IOC.	This is contained in the section 9 <i>"Strategic delivery and core outputs"</i> under <i>"Strategic Objective 1: Enhanced science-based understanding of drivers impacting ecosystem health and services"</i>
29	Annex 1: If the list of UN agencies, which is interesting not informative, is necessary, WHO and IHO should be included	A <i>"Partnerships"</i> section has been added; but not very explicit – may need to reflect on how more specific we need to be – consideration of a mapping in an annex
30	Annex 1: UNESCO-IOC: The IOC is currently coordinating the UN Decade on Ocean Science for Sustainable Development (2021-2030) designated by UN General Assembly resolution in 2016.	Need to re-look at annexes; for moment focus on main document
31	Annex 1: Correct the UNGA Assembly resolution year of adoption. It is 2017.	Need to re-look at annexes; for moment focus on main document
32	<p>Annex 1: In Annex 1 the text concerning the FAO is inaccurate, most notably with regards to its role in supporting Regional Fisheries Management Organizations (RFMOs). Many RFMOs are independent, treaty-based bodies that are not associated with the FAO or UN system, though the FAO may attend as an observer and provide technical support if requested by an organization. In addition, many of the instruments adopted by the FAO are not agreements, but are rather non-binding instruments. Correct the description to the following:</p> <ul style="list-style-type: none"> ○ "FAO is the specialised UN agency leading international efforts on food security [add: works to promote][move: sustainable fisheries, particularly where international cooperation is required.] The FAO Fisheries and Aquaculture Department administers and supports [delete:44][add:10 statutory regional fisheries bodies (RFBs). In addition, it supports in a technical capacity] Regional Fisheries Management Organizations (RFMOs)[add:, which are independent, legally-binding, treaty based bodies, that manage fisheries around the world.] [delete everything following: and as such has a critical responsibility to achieve sustainable fisheries, particularly where international cooperation is required. There is a patchwork of fisheries management organizations covering all regions of the global ocean.] ○ Several important FAO [add: instruments and] 	Need to re-look at annexes; for moment focus on main document

	Comment	UN Environment Programme's Response
	agreements have been adopted to promote sustainable fishing practices.	
Norway [verbal during CPR, 11 Dec 2018]		
1	Welcomed focus on UN Environment's key role on SDGs, but need to be more explicit, i.e. what is value added of UN Environment on oceans? This is quite unclear from the draft strategy, needs further work.	Strengthened in Section 4 <i>The basis for Action</i> , and Section 6 UN Environment's Comparative Advantage. Section 9 <i>Strategic Delivery and Core Outputs</i> where an account of the services/outputs is given and identification of the key actors
2	Needs further operationalizing and details on financing, like blue economy and innovative financing.	Section 9 <i>Strategic Delivery and Core Outputs</i> has elaborated extensively the operationalization of the approach; refer to Section 9.4. <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i>
3	Needs to clarify how this differs from Green Economy? Strong body of work already exists. Need further focus on the peculiar aspects of 'blue' economy.	Section 5 <i>Strategy guiding principles</i> introduces this under 'Fostering the Valuation of Natural Capital'. Further elaboration is made under Section 9.4 <i>Strategic Objective 4: Innovative Financing Instruments and Initiatives Facilitating Sustainable Blue Economy Transition</i>
4	Some aspects need clarifying: surprised to not find any references to UNEA resolutions and decisions, e.g. marine litter and other resolutions.	References added under Section 4.2 'UN Environment's Framework that Guides the Strategy'
5	Need deeper details on normative work and science-based policy link (will provide more details in written comments).	Elaborated under Section 9. These details are made more explicit; this flows from the Theory of Change in Section 8
6	Some things could be further incorporated: for example IPCC report on oceans to be finalized 2019; GEO 6.	Elaborated under Section 9.1. <i>Strategic Objective 1: Enhanced Science-Based Understanding of Drivers Impacting Ecosystem Health and Services</i> ; references to climate change assessments on oceans. Further references under 9.3. <i>Strategic Objective 3: Effective Governance and Integrated Management of Drivers Impacting Marine and Coastal Biodiversity and Ecosystem Services</i>
7	Overall, must provide more substantive basis on the proposed UNEP leadership role on oceans. Want UN Environment to play a vital role in the solutions. Need to build this role with other actors and support from member states. Need to work for UN Environment being a key in the ocean agenda.	Enhanced narratives under Section 4 <i>The basis for Action</i> , Section 5. <i>Strategy guiding principles</i> , that reinforce the mandated UN Environment approaches to ocean ecosystem management. Section 6 <i>UN Environment's Comparative Advantage</i> further suggests where the niche lies. All this is elaborated in Section 9 <i>Strategic Delivery and Core Outputs</i> where an account of the services/outputs is given and identification of the key actors