



## World Animal Net: Updated Comments on the Theme of UNEA 5

World Animal Net provided [initial comments on the theme of UNEA 5](#) based on the “thought-starter” provided by UN Environment. We are now submitting further comments based on the latest proposal at the time of writing, [Consensual elements for the theme for the fifth Session of the UN Environment Assembly \(UNEA\)](#), and discussion of this issue at the Committee of Permanent Representatives Sub-Committee Meeting on Thursday 31<sup>st</sup> October. Our original submission was not in favor of nature-based solutions (NBS) as a UNEA 5 theme, and many of our concerns remain. However, as a majority of Member States expressed support for a theme related to NBS, we have attempted in this submission to explain our concerns, and suggest ways in which these could be addressed.

### General Comments

The proposed link to sustainable development (SD) is positive, as it has the potential to strengthen the environment as a key pillar of the Sustainable Development Agenda, as opposed to the current situation where it lies a poor third in terms of political importance – failing to reflect the current environmental crisis and the fact that natural resources and the environment underlie the achievement of all of the SDGs.

We also welcomed the agreement that a holistic approach be taken, which would allow for the inclusion of elements from the other tentative thematic areas outlined in the thought-starter - namely “Blue Planet: Transformative actions to protect our freshwater and oceans” and “Addressing the water–energy–food interlinkages for sustainability”. This is vital, because these two issues are also of fundamental importance. As this [recent New York Times article](#) explains, oceans are as important as forests. As for food systems, the [FAO explains here](#) why these lie at the heart of the United Nations’ Sustainable Development Goals (SDGs). What is more, there are already functioning nature-based solutions to our broken food system, which can be scaled up and rolled out (such as agro-ecological solutions/regenerative agriculture, including silvo-pastoral systems). Then, as suggested by the EU in their submission, the theme should also take into account the pollution agenda, as relevant, to ensure continuity with previous UNEAs.

### Concerns

NBS is a relatively new concept, with no one agreed-upon definition. Because of this, “there is a danger of oversimplification, reinventing the wheel, (non)deliberate misuse, or generating new, unforeseen trade-offs in decision-making”.<sup>1</sup> IUCN, who recently led a best practice for NBS survey, agreed that the knowledge base is still being developed and the absence of comprehensive guidance may promote ill-considered interventions which subsequently fail to deliver. There are significant concerns about misuse/abuse. It is a concept which has the potential to be used for “green-washing” and/or hijacked, for example, to promote techniques and materials causing net environmental harm<sup>2</sup>.

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<sup>1</sup> Nesshover, C. et al. The science, policy and practice of nature-based solutions: An interdisciplinary perspective. *Science of the Total Environment*. 579 (2017) 1215-1227.

<sup>2</sup> GAIA. Submission on UNEA-5 draft themes Global Alliance for Incinerator Alternatives.

<http://wedocs.unep.org/bitstream/handle/20.500.11822/30005/GAIA%20submission%20UNEA5%20themes.pdf?sequence=10&isAllowed=y>

Another concern is that NBS are sometimes slanted towards innovation, market incentives, and commodification of nature, which can lead to “business as usual” values and approaches. Key goals must be the effective protection and restoration of natural resources and the environment, including the climate, biodiversity and ecosystems.

Most important is the need to ensure **transformational change**, and not just “band-aid” approaches or techno-fixes. This is particularly important given that the theme for the next High Level Political Forum (HLPF) will be “**Accelerated action and transformative pathways: realizing the decade of action and delivery for sustainable development**”. We need to ensure that UNEA 5 is able to carry forward the transformational changes needed, building on the 2020 HLPF.

The Women’s Major Groups said in its submission: “There is also the problematic connotation of “solutions” that could fix any problems after they occur, rather than tackling the root causes and drivers, as deemed necessary in the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report. For instance, preventing deforestation at source and retaining rich and diverse ecosystems is crucial, as opposed to replacing them with monoculture plantations. Prevention at source means tackling root causes, such as excessive meat consumption (and commodification, for export markets, etc.) that destroys ecological institutions.”<sup>3</sup>

A focus on solutions can also lead to the assumption that there is already agreement regarding the problem, when in reality this can be due to a complex mix of drivers and indirect drivers. Lack of equity among stakeholders can also mean that some stakeholders will benefit disproportionately from “solutions,” while the problems faced by those furthest behind continue to be ignored.

Further, whilst the idea of including sub-themes in the note is welcomed, in principle, these would need to be well-thought out to ensure that they are priority focus areas which maximise positive impact. For example, the first is on “Enhancing ecosystem services for inter alia sustainable food, water and energy systems”. There is a danger that this will restrict the consideration of the vital food-water-energy nexus to economic aspects, whereas the scope should be much wider – primarily focussing on resource and environmental issues, but also social issues such as health and livelihoods, as well as economic aspects. Even economic aspects should not be reduced to “ecosystem services” which remains just one controversial approach amongst a number of approaches (including, but not limited to, circular economy, including waste prevention, nature-based accounting, and retargeting of subsidies and incentives). It is important that any approach leads towards “harmony with nature”, and not further commodification of nature. We need to ensure recognition of values in addition to economic (including intrinsic, cultural and spiritual values etc.).

## Suggestions

Because of these concerns, we suggest that if NBS is selected, UNEA will need to agree on a tighter, well-considered definition and theme, and introduce safeguards to ensure effective and productive implementation. Some suggestions which could be considered are:

- NBS must include a firm commitment to action to achieve planetary survival and restoration.
- NBS must be clearly defined as a tool for achieving the transformative change we need.
- Root causes and drivers must be acknowledged and addressed in tandem with any NBS.
- UNEA 5 works for evidence-based action, and aims for acceleration of the bold policies and practices needed to achieve the global goals for the climate, biodiversity and sustainable development.

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<sup>3</sup> Women’s Major Group - Comments on the proposed thematic areas for UNEA-5.  
<https://wedocs.unep.org/bitstream/handle/20.500.11822/30005/WMG%20UNEA-5%20comments.pdf?sequence=9&isAllowed=y>

- The conservation of nature, biodiversity and ecosystems, rather than the appropriation of nature for monetary gain, is clearly and unequivocally articulated as a key goal of NBS.
- Equity must be mainstreamed into all NBS approaches. Rights-holders, including women, Indigenous Peoples, and youth, must be given a key role in both defining problems and agreeing NBS initiatives.
- We urge UNEA and parties to consider the interests of other species and the impacts of climate change, biodiversity loss and ecosystem decline on them, and to consider solutions that can also benefit them, notwithstanding their economic value to human societies.

The NBS theme should be made stronger, more urgent, and also more grounded, by linking it with a term like “ambition”, “commitment”, or even something like “planetary survival.” This is particularly relevant since UNEA 5 will be taking place soon after the conclusion of the “super year” of 2020 and it will be crucial to hold governments, the private sector, civil society, and others accountable for the actions they have taken and the commitments they have made (or not), including financial commitments.

The format of UNEA 5 will also be of prime importance to the success of the theme, and needs to be given similar thought and analysis, with full stakeholder consultation.

## Global Pact for the Environment

We should not forget the commitment to carry forward work on the Global Pact for the Environment in the context of UNEA 5 and Stockholm +50. This is embedded in [UN General Assembly Resolution A/RES/73/333](#) of 5 September 2019.

This resolution includes the following:

“b) Forward these recommendations to the United Nations Environment Assembly for its consideration, and to prepare, at its fifth session, in February 2021, a political declaration for a United Nations high-level meeting, subject to voluntary funding, in the context of the commemoration of the creation of the United Nations Environment Programme by the United Nations Conference on the Human Environment, held in Stockholm from 5 to 16 June 1972, with a view to strengthening the implementation of international environmental law and international environmental governance, in line with paragraph 88 of the outcome document of the United Nations Conference on Sustainable Development, entitled “The future we want”.”

World Animal Net  
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