

UK COMMENTS ON THE ON THE MEDIUM-TERM STRATEGY 2021- 2025

Overarching comments

- The UK welcomes this next iteration of the strategy document for the MTS as an important step in producing an effecting and cohesive strategy.
- Again, the situational analysis highlights the need for UNEP's critical functions and the need of a multilateral system.
- We note that the section '**Overview of Resources**' (p3 of annex 1), which will 'set out UNEP's overall budget and resource requirements by funding source and budget component for the biennium 2022-2023' requires development. We await further detail here.
- The draft document should sure the term 'ocean" and not "oceans", as this is standard UN usage.

On chemicals:

- The actions under SDG 12.4 specifically relating to chemicals should be SMART (Specific, Measurable, Achievable, Realistic and Time-bound) and we would welcome more ambition.
- The document only refers to the indicator 12.4.2 which deals with hazardous waste, 12.4.1 (number of parties to MEAs on hazardous waste and chemicals) should also be included.
- We would like to see an explicit link made to the Beyond-2020 Framework as part of its purpose is to support the achievement of SDG 12.4.

Specific comments

P16 climate action

- On the aspiration 'the world has fully harnessed climate benefits from resource and energy efficiency measures in all major resource and energy-intensive sectors of the economy', how will 'fully' be defined and measured?

P17

- In relation to the phrase '**Focus on those that can contribute to the highest impact. UNEP will help all countries raise the level of their mitigation ambition, with a focus on high-emitting countries**' there could be an additional comment/phrase of 'with a view to setting examples all countries can follow' in order avoid this sounding exclusionary.

p.18.

- The phrase dematerialization may not be accepted by developing nations which may see it as limiting to consumer consumption.

p.19

- On the goal '**UNEP will help countries measure progress towards decarbonization and resilience for stronger engagement in the global stocktake process**', UNEP will need to take into account other actors already undertaking this function. We would welcome more detail on how UNEP will interlock with other organisations; agreements; processes etc.

p.24

- Under the list of actions on chemical pollution, the draft text has taken SDG target 12.4, which originally had an expiration date of 2020, and pushed this back to 2025 – we would like clarity on whether this is the UN position on this target i.e. it will stand but with a later date, or if there would be a better target in its place e.g. something around agreeing and implementing the Beyond 2020 Framework on Chemicals and Waste, which is currently being negotiated and will support the achievement of 12.4.

p.26

- “Outcome 3” - “Scale ongoing efforts on addressing land- *and sea*-based sources of marine pollution, especially marine litter, nutrients, chemicals and plastic.

P27 Coherence and integration.

- The role of UNEP needs to be clearly defined alongside other international science-policy interfaces (including IPCC and IPBES). This is a complex landscape without any established hierarchy or oversight. The other assessment processes are independent legal entities answerable to their own memberships and rules and procedures. So the reference to ‘bring together’ these assessments needs further clarification.
- We would welcome further detail on the ‘Global Environment Assessment Dialogue’. Is there a report from this dialogue process? It would be very useful to have a summary of these assessment processes and their future work plans, so that we are able to identify any potential duplications or significant gaps. This information needs to be provided back to the assessment processes themselves, as their governance bodies are independent.

P28 Closing the gap on environmental data

- We welcome the aspirations here but would welcome more detail in terms of specific outcomes or deliverables. For example, what UNEP will do, where it will focus, how we will know whether it has made any difference. The bold text heading misses out a reference to synergies which is an important part of this para.

P28 Digitizing scientific knowledge

- It would be good to understand what assessment and prioritisation of needs has been undertaken. Who are the customers for these services and what do they need? How far do other international bodies, MEAs, NGOs provide these services? Should the role of UNEP be to signpost where these services are available. Difficult to see how ‘the public’ will measure the effectiveness of pace and scale of transformation using these services? Also, the important function of horizon scanning is buried in this para and should be reflected in the bold headline.

P28 Speaking to all

- UNEP is one voice among many and the different international bodies vying for attention risks diluting and confusing the messages. Again, is there a role for UNEP to look across the international landscape and support the different bodies involved in providing more coherent messages, so the sum is greater than the parts.

P29 Science policy as a foundation

- How will UNEP ensure that sound science backs all financial transformations, what mechanisms does it have to achieve this?