

**Comments on UNEP’s draft Medium Term Strategy and Programme of Work**

**from World Animal Net**

**Consideration of draft** [**UNEP Medium-Term Strategy 2022-2025**](https://wedocs.unep.org/bitstream/handle/20.500.11822/34416/Item%202%20MTS.PDF?sequence=1&isAllowed=y) **(MTS)**

**General Comments**

There should be more focus on the environmental messages from COVID-19, its enormous impacts on every dimension of the SDGs, and the threat of potential devastation from future pandemics. Also, more stress on the fact that rethinking and reordering our relationship with and treatment of nature and animals is vital to the prevention of future pandemics.

There should also be more emphasis on One Health/One Welfare, as a vital cross-sectoral collaboration in this regard. The small mention on page 23/25 is not enough.

The term “building forward better” should be used, in preference to “building back better” – see below.

As regards building forward better, the promotion of green stimulus packages and green new deals should be included.

Food systems and food waste should be given greater prominence, given that around 30% of all food is wasted, and taking into account the major impact of food production on all three pillars of the strategy. Perhaps the pillar design has detracted from cross-cutting issues such as this?

References to environmental defenders have been removed. They were mentioned twice in the earlier version dated 28 August 2020 – see [here](https://wedocs.unep.org/bitstream/handle/20.500.11822/33581/Agenda%20Item%205%20MTS%20%26%20POW.PDF?sequence=1&isAllowed=y). Environmental defenders play a crucial role in protecting the environment, particularly against destructive business practices. Yet more defenders than ever are being killed, while others are threatened, criminalised and attacked. It is essential that governments work to protect defenders and bring those who harm them to justice. It is totally unacceptable that some countries – who may persecute their own environmental defenders – are able to manipulate the removal of such references in UNEP’s strategy when UNEP already has an [environmental defenders’ policy](https://www.unenvironment.org/news-and-stories/story/un-environment-launches-environmental-defenders-policy#:~:text=The%20Environmental%20Defenders%20Policy%20promotes,many%20parts%20of%20the%20world.). This must be reintroduced in some form.

**Page 4 (as numbered, 6 in total)**

“Up to 400 million tons of heavy metals, solvents, toxic sludge and other industrial wastes are released annually into the world’s waters.”

It is important that water pollution from agriculture is also included here.

See the FAO report on [Water Pollution from Agriculture: A Global Review](http://www.fao.org/land-water/news-archive/news-detail/en/c/1032702/). This confirms that agriculture is responsible for discharging large quantities of agrochemicals, organic matter, drug residues, sediments and saline drainage into water bodies. In the words of Eduardo Mansur, Director of FAO’s Land and Water Division: “In most high-income countries and many emerging economies, agricultural pollution has overtaken contamination from settlements and industries as the main factor in the degradation of inland and coastal waters”.

**Page 5 (7 in total)**

Need to be certain that terminology is forward-looking. “Building back better” is now being replaced by “building forward better”, which is greatly preferable.

Also, this should include the prevention of future pandemics in its scope. Otherwise there is no meaningful building forward.

**Page 10 (12 in total)**

“UNEP will also revise its Partnership Strategy to ensure a stronger pursuit of its comparative advantage that matches an increased resource ambition vis-à-vis the delivery of its strategic priorities.”

Some concern over the potential meaning and interpretation of this ambiguous sentence. Could it, for example, mean that UNEP’s partnership strategy will be revised in order to take account of the need for more funding, as opposed to achieving its environmental mission? And, if so, could this mean more attention to business partnerships, and less to NGOs? Suggest that this is clarified to avoid any ambiguity – and in a way which does not give any preference to partnerships with business or indeed for fundraising purposes as opposed to achieving UNEP’s strategy/mission.

**Page 12 (14 in total)**

Para 4 should specifically mention Regional Economic Communities (RECs) and continental bodies (EU, AU) in connection with action at regional level. Although the UN Regional Collaborative Platform does include RECs, they are sufficiently important to be specifically mentioned.

**Page 22 (24 in total)**

Under the Nature Action pillar, there should be more about the intrinsic value of nature, and its connection to spiritual and mental well-being. At the end of the day, it is this spirit of appreciation and reverence for nature (as expressed by many indigenous peoples) that will build enduring Harmony with Nature, as opposed to its extrinsic, utilitarian value.

**Page 21 (23 in total)**

Para 1: Where it is stated that: “These will deliver science-based solutions for nature across sectors and levels of governance to halt and reverse the loss of biodiversity and ecosystem integrity” etc., it would be preferable to add “proven and science-based”, because some traditional and indigenous solutions may present best practices that can be upscaled, although these may not have been the subject of scientific research i.e. where practical experience has proved effectiveness, then there is no need for scientific verification.

It would also be useful to include reference to the prevention of future pandemics here, as harmony with nature is key to the achievement of effective preventative measures.

**Page 22 (24 in total)**

“UNEP will assist countries in developing biodiversity-based economies as important components of their national economic development that ensures sustainability, equitable benefit-sharing and which will build social and environmental resilience.”

This sounds as though UNEP is assisting countries to make money out of its biodiversity? In practice, shouldn’t this be something along the lines of: “… assist countries in developing economic and development systems which take full account of the value of biodiversity, ensuring that any use is sustainable and equitable, and will support lasting social and environmental well-being.”?

Where UNEP refers to the achievement of the SDGs, shouldn’t this more accurately reflect its environmental remit? I.e. support countries to achieve the environmental SDGs, and in the process help with the achievement of other social and economic SDGs?

In the section on social and behavioural change, labelling should not only be in connection with biodiversity, but also pollution and climate change? Or simply say “environmental impact”?

**Page 23 (25 in total)**

Here again, the text should not only refer to science-based approaches, but also proven practical experiences.

Member States is sometimes capitalised, and sometimes not. Suggest consistent format.

“UNEP will also support efforts to mainstream biodiversity for health and nutrition.”

This sounds as though UNEP will be promoting the eating of biodiversity. Could this be better phrased – for example, “UNEP will also support the mainstreaming of biodiversity considerations in all relevant policy streams, including food safety, health and nutrition.

**Page 24 (26 in total)**

Complemented, not complimented.

**Page 28 (30 in total)**

Food waste should be considered separately here, given its massive detrimental impact across priority environmental issues.

As António Guterres said in a speech delivered at Colombia University on 2nd December, food systems are one of the main reasons why we fail to stay within our planetary boundaries.

**Page 29 (31 in total)**

Here again, there is a reference which goes beyond UNEP’s environmental remit: “strengthen the interface between science and policymaking across the sustainable development agenda”. Should this not be across the environmental SDGs?

**Page 30 (32 in total)**

“UNEP will continue to measure and monitor country progress on the Sustainable Development Goals” – should this not be the environmental SDGs?

**Page 35 (37 in total)**

“UNEP will promote integration of the environmental dimension when supporting Finance and Economic Transformations. Strengthening the environmental dimension of economic policy decisions” etc.

Should there also be something on promoting systemic change to economic and development frameworks, to ensure the full integration of the environmental dimension?

**Page 38 (40 in total)**

The internalisation of the true costs of pollution in financial and economic decisions is included in the context of transition towards a pollution-free planet. However, internalising externalities should apply across the board. I.e. Including resource use, pollution, biodiversity destruction/degradation and climate change impacts.

**UNEP’s draft** [**Programme of Work 2022-2023**](https://wedocs.unep.org/bitstream/handle/20.500.11822/34418/Cover%20note%20PoW%20Subcommittee%203%20December%202020-merged.pdf?sequence=1&isAllowed=y) **(PoW)**

**General Comments**

The general comments made above in respect of the MTS should also be considered in the context of the Programme of Work (PoW).

In particular, there should be more focus on the recovery from COVID-19 and the prevention of future pandemics. It is striking that the word “animal” does not appear once in the PoW, despite the fact that other (non-human) animals are not only part of nature, but also fellow sentient beings. This is a shocking omission, especially given the lessons of COVID (contained in UNEP statements and its joint report with ILRI on [preventing the next pandemic](https://www.unenvironment.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and)). For example:

“Pandemics such as the COVID-19 outbreak are a predictable and predicted outcome of how people source and grow food, trade and consume animals, and alter environments.”

Plus, the fact that 75% of new and emerging diseases are zoonotic in nature.

It is vital in the prevention of future pandemics that the PoW includes the necessary rethinking and reordering of our relationship with - and treatment of - animals, as well as nature. Indeed, this is also an integral (and indivisible) part of harmony with nature.

Also, there should be more emphasis on One Health/One Welfare, as a vital cross-sectoral collaboration in this regard. At present there are only two minor references.

There should be specific work streams on advocacy/capacity building in favour of green stimulus packages and green new deals.

The PoW does mention the need to “accelerate and scale up transformational shifts towards sustainable patterns of consumption and production, while targeting the drivers and proposing solutions to the challenges of climate change, biodiversity loss and pollution”. However, because of the pillar approach, there is insufficient attention given to transformational changes based on key root causes and drivers which cut across the pillars. One example is food system transformation. Food systems are major drivers of climate change, biodiversity loss and pollution, and yet food is only mentioned four times in passing - once as a footnote (identified as a nexus issue), once under Nature Action (just in connection with costing), and in connection with food loss and food waste. There needs to be more emphasis on food systems – and other cross-cutting root causes and drivers - in the PoW, and an indication of how work on these will be actioned. For example, will there be a matrix approach, with a lead unit in one pillar of work, but a coordination team across the pillars? To be effective, there will have to be both lead responsibility, and coordination across the three pillars, foundational and enabling programmes and relevant MEAs.

Food waste should be given greater prominence, given that around 30% of all food is wasted, and taking into account the major impact of food production on all three pillars of the strategy.

If any of these suggestions, or those below, are incorporated, they will also need to be included in outcomes and indicators.

**Page 6 (9 in total)**

There should be more focus on food systems and the elimination of food waste in this section on pollution (as well as in connection with biodiversity loss and climate change).

**Page 7 (10 in total)**

In the section on Nature Action, there is an inference that all nature/natural resources need to be sustainably managed, whereas there are of course wilderness areas which are left as such. Ecosystems are self-regulating, and human “management” and control is often counter-productive in complex and diverse ecosystems with multiple interactions. Perhaps it would be better to say that where nature/natural resources are managed, then this should be in a sustainable and environmentally-friendly manner?

The nudging of human awareness and behaviour should also involve media and social media work, and be guided by social science.

**Page 8 (11 in total)**

A move towards a right to a healthy environment should be included in the section on Environmental Governance.

There should also be advocacy/support for member states to introduce such rights, including constitutional provisions.

**Page 12 (15 in total)**

The section on Finance and Economic Transformation (just under para 1.1.3.) should also include advocacy/influence in respect of international and regional financial institutions, not just private finance.

This section also needs to include more on advocacy/support for public economic reforms to further each of the three pillars – areas where governments can make an enormous impact such as assessment and repurposing of subsidies and incentives, “internalising externalities”, and public procurement policies etc. At the moment, there is not consistency of outcomes across the three pillars, but in many cases (where perceived enablers are generic) the same outcomes could be sought?