

Argentinean Delegation

152nd meeting of the Committee of Permanent Representatives - Nairobi, 19 November 2020

Agenda Item 6 - Consideration of UNEP Medium-Term Strategy
2022-2050 and Programme of Work 2022-2023

Comments and changes to the draft of UNEP's Medium Term
Strategy 2022-2025

On page 5:

Regarding "underlying indirect and direct drivers of change":
The discussion regarding the indirect and direct drivers of
biodiversity loss has been controversial. In particular,
addressing indirect drivers such as international trade or
demographic change needs to be done in coordination with
other multilateral fora and go beyond the environmental scope
of UNEP. In fact, they comprise several economic and social
aspects of sustainable development. Therefore, we suggest
changing "addressing the underlying indirect and direct
drivers change" for "addressing the drivers of change".

On page 6:

Regarding "Gender equality and a rights-based approach are
key to ending all forms of discrimination and ensuring
progress towards environmental sustainability":

We are very supportive of the inclusion of a gender equality
and a rights-based approach. These are key aspects to reduce
environmental degradation and Argentina is very committed to
enhancing women and indigenous people participation in
environmental action.

Regarding "Seventy-five years after the signing of the UN
Charter, the importance of environmental multilateralism
remains as crucial as ever":

Multilateral institutions have an important role to play in
providing means for implementing multilateral environmental
agreements. Reinvigorating multilateralism to achieve the
2030 agenda should include strengthening international

cooperation and the provision of finance from developed to developing countries to address environmental challenges.

On page 8:

Regarding "full transparency on the environmental performance and carbon footprints of goods and services, companies and nations must remain a shared goal":

We would like to request more information on what full transparency on performance and carbon footprints means, which methodological approach would be used, how information would be collected, etc. In general terms, we believe that any development in measuring the footprint of goods and services needs to be member driven and in full compliance with multilateral agreed rules.

On page 12:

Regarding "transformative change":

The high expectation of outcomes that the Members states have agreed under UN negotiations is a world where "sustainable development", as described in the 2030 agenda, occurs. We suggest changing the term transformative change, which lacks of specificity and is yet to be multilaterally agreed, for "sustainable development".

On page 13:

Regarding "UNEP will strengthen South-South and triangular cooperation to enable all Member States to progress towards environmental sustainability":

Argentina is a strong supporter of South-South and triangular cooperation. Nevertheless, we would like to also see a more active role of UNEP in encouraging the increase of the official development assistance flows from developed countries for meeting environmental challenges in the developing world.

On page 14:

Regarding "Living in harmony with nature, where humanity prospers in harmony with nature":

Living in harmony with nature is the 2050 vision of the Convention on Biological Diversity established in the 10th COP, in 2010, by Decision X/2. In this regard, the correct explanation of the vision is where "biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people". We suggest adjusting this paragraph to this language.

On page 20:

Regarding:

"- By 2025 the implementation of the post-2020 global biodiversity framework is well underway through related national planning, implementation, monitoring and reporting processes.

- By 2025 biodiversity is mainstreamed for sustainable development and across key themes and sectors (e.g., food and agriculture, sustainable forest management and zero deforestation, health, infrastructure, mining, tourism, trade, energy, cities, finance, governance and justice) to realize multiple benefits and avoid negative impacts on nature.

- By 2025, significant actions are taken to reduce ecosystems degradation and build the resilience of landscapes and seascapes, with ecosystem integrity and conservation being leveraged as assets and tools for disaster risk reduction and greater social resilience.

- By 2025, methodologies and tools to integrate biodiversity and ecosystems into consumer, infrastructure and financial decision-making are developed and made available for governments and financial institutions to align their policies and investment portfolios with global biodiversity targets":

We take note of the requirements that UNEP identifies regarding what is needed for living in harmony with nature. However, we believe that this is for member states to decide in the negotiation of the Post 2020 Global Biodiversity

Framework under CBD. The MTS is not the place to say what is needed to address a framework that has not yet been agreed. We suggest deleting these paragraphs and the reference to what is needed for the long term goals of the post 2020 global biodiversity framework.

Regarding "transformational change":

Transformational change is language taken from scientific assessments such as IPBES. In the medium strategy of UNEP, which is conceived as a policy instrument for a UN Program, we would recommend sticking to multilateral agreed language. Therefore, we suggest changing transformational change (a term with a scope unknown to us) for sustainable development.

Regarding "nature-positive solutions":

We would like to seek clarification on the scope of the term nature positive. We recommend changing this term for "sustainable solutions" or just "solutions".

On page 21:

Regarding "Together, these actions will set the world on a pathway to ensuring well-functioning ecosystems and environmental safeguards, poverty eradication, social resilience, green and decent job creation and a resilient economic and trade system based on more sustainable consumption and production patterns":

We agree with this approach, which encompasses the three dimensions of sustainable development. We would like to stress that it has to be undertaken in line with other international processes that play a role in the social and economic dimensions of SDGs, as well as multilaterally agreed rules.

On page 22:

Regarding "incentives":

We suggest adding: "Any proposed incentive should be developed in line with multilaterally agreed rules, in particular those of the World Trade Organization".

Regarding "obligations under the SDGs":

The SDGs are an aspirational agenda, they are not legally binding. Therefore, we suggest the following modification: "... to make progress towards the SDGs and implement their respective obligations under multilateral environmental agreements".

Regarding "UNEP will support social and behavioral change":

We believe that social and behavioral changes are complex processes that cannot be addressed as simple outcomes of policy measures. Therefore, we suggest changing the language for "UNEP will support the promotion of social and...". We believe this suggestion helps capturing a role for UNEP in national promotion of those changes in a more realistic fashion.

Regarding "UNEP will also work with standard setting and labeling schemes to promote and improve existing consumer information tools by including criteria on the biodiversity impact of key products":

We suggest adding: "This should be done in line with multilaterally agreed rules, in particular those of the World Trade Organization."

Regarding "This includes applying science-based approaches in the sustainable use of biodiversity and ecosystem services and restoring and protecting functional capacity and connectivity within and between freshwater, terrestrial and marine ecosystems":

We take note of what UNEP identifies as something that should be included to implement the post 2020 global biodiversity framework. However, we believe that this is for member states to decide in the negotiation of the Post 2020 Global Biodiversity Framework under CBD. The MTS is not the place to say what is needed to implement a framework that has not yet been agreed. We suggest deleting this sentence for it prejudices the result of ongoing negotiations.

On page 23:

Regarding "value chain approach":

We suggest adding: "In line with multilaterally agreed rules, in particular those of WTO."

Regarding "sustainable food value chains":

We would like clarification on the scope of this term. We believe that fully addressing value chains and sustainable food may be out of the environmental scope of UNEP and, in any case, it should be done in cooperation with FAO and WTO.

Regarding "UNEP will provide guidance to governments": We suggest clarifying that the nature of this guidance will be "voluntary".

Regarding "UNEP will use these opportunities to influence demand side pressure on biodiversity and ecosystems through consumer information on the environmental footprint of products and by encouraging the adoption of sustainable consumption and lifestyles":

We would like to see clarification on the extent of what is intended by this sentence. In general, we would say that sustainable consumption patterns have to be promoted, in line with the SDGs and that all consideration regarding labeling, footprints, etc, should be done in line with multilaterally agreed rules. This is of particular importance for small scale local producers which are often unable to access expensive certification processes and may be left out of market even when they can actually be very sustainable.

Regarding "food systems":

This term lacks a multilateral agreed definition. It will be further explored in 2021, in the Food System Summit under the UN.

Regarding "nature-positive and resource efficient practices":

We would like to see clarification on the meaning of nature positive agriculture.

Regarding "such as agroecology and regenerative agriculture in collaboration with its partners":

We believe there are many methods of sustainable agriculture. We suggest deleting these examples given that we do not think that UNEP's work should preclude to any specific type of sustainable practice.

On item "4.1 Thematic Subprogrammes - Climate Action":

United Nations Framework Convention on Climate Change is the main arena for negotiations on climate change and it is there that the Parties to the Convention and the Paris Agreement define the lines of action to be taken on this issue.

In this regard, the language used in the MTS relating to climate change should be consistent with the language agreed in the UNFCCC and the Paris Agreement. The language used in particular in Articles 2, 3 and 4 of the Convention and Articles 2, 3, 4, 7, 9, 10, 11, and 13 of the Paris Agreement should be taken into account for this purpose.

Furthermore, it is recalled that mitigation and adaptation actions must be accompanied and supported by the provision and mobilization of means of implementation (financial resources, technology transfer, and capacity building) from developed to developing countries.

Although the document highlights the importance of mitigation and adaptation, it does not consider the latter, which is one of the central objectives of the Paris Agreement (Art. 2.1c) and one of the main obligations derived from the Convention for developed countries. It is suggested that this reference be included at all times to refer to the objectives of the Paris Agreement.

Likewise, it is highlighted that the action priorities in terms of mitigation and adaptation are defined by the Parties in a national way in their NDCs, so it is expected that UNEP supports the actions identified as priorities by each Party in accordance with what was agreed in Paris and that it does not contribute to promote sectorialization agendas of the climate action, duplicating work and negotiation instances.

The sustainable consumption and production agenda has its specific spaces for debate, outside the UNFCCC. On the other hand, UNEP does not have a mandate to promote the consumption of one type of goods over others and any effort in that direction must take into account the need to prevent climate actions from being a disguised barrier to trade, in line with the provisions of Article 3.5 of the Convention.

The Paris Agreement recognizes the special circumstances and vulnerabilities of two groups of countries: Least Developed Countries and Small Island Developing States.

In this regard, we suggest the following modifications (bold indicates new wording and Strikethrough indicates delete):

Changes to 1st Paragraph:

A clear focus on the **UNFCCC and the** Paris Agreement. Achieving long-term climate stability will depend on countries making balanced progress towards their **commitments on mitigation, adaptation and means of implementation** ~~mitigation and adaptation commitments~~, under the Paris Agreement, **in line with its objectives.** ~~including "holding the increase in global average temperatures to well below 2oC above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5oC" and "increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development"~~. A transition towards climate stability, in line with the sustainable development goals and the long-term goals of the Paris Agreement, requires that:

By 2025, countries and legal entities increasingly adopt decarbonization, dematerialization and resilience pathways **implement their nationally determined contributions under the Paris Agreement.**

By 2025, countries and legal entities have enhanced capacity, and technology and finance solutions in support of the Paris Agreement Goals.

By 2025, countries and legal entities have enhanced capacity to monitor, account and report for climate and related action under the Paris Agreement.

Changes to 2nd paragraph:

The expected 2030 outcome of the subprogramme is that government and non-government development action are compatible with the long-term ~~mitigation and resilience~~ goals of the Paris Agreement.

The Climate Action subprogramme will operate through the following principles:

Changes to principle 2:

2. Supporting countries and stakeholders to achieve rapid, just and comprehensive ~~decarbonization~~ greenhouse gas emissions reductions, in line with their NDCs. ~~UNEP's efforts will follow a value chain and multisectoral approach that demonstrates opportunities for the deployment of timely renewable energy and energy efficiency solutions at all geographic levels; halting deforestation and habitat loss; restoring degraded ecosystems and changing the way we produce and consume food; transitioning to the circular economy and higher resource efficiency; and redesigning our cities and transport sectors.~~

Delete principle 4.

~~4. Policies and actions for sustainable consumption and production practices to reduce greenhouse gas emissions. UNEP will support governments, business and individuals in making informed choices to increase production of and demand for resource efficient and less carbon intensive goods and services, building on the work of relevant International Resource Panel analysis and support to a growing number of countries to identify greenhouse gas emission hotspots in national economies.~~

The Climate Action subprogramme will focus on interconnected actions and interventions to achieve three 2025 outcomes.

Changes to Outcome 1.

Outcome 1: Decision makers at all levels adopt decarbonization, dematerialization and resilience pathways. In collaboration with its networks, UNEP will support countries to take full advantage of the opportunities presented by decarbonization, dematerialization and resilience and link these to higher climate aspirations. UNEP will focus on **the priorities identified by Parties to the Paris Agreement in their respective NDCs** ~~sectors with the largest emissions,~~ based on the latest scientific evidence **and the principle of common but differentiated responsibilities** ~~of their share of national emissions and role in ensuring resilience of the socioeconomic fabric.~~

Delete the phrase:

~~Generating science driven public support for ambitious climate advocacy and supporting sustainable consumer behaviour will be central to UNEP's focus. UNEP will continue to function as a link between policymakers and the public, leveraging, for example, the One Planet Network for communicating the benefits of using sustainable products and adopting sustainable lifestyles, while sharing information that supports making the economic case for such change.~~

Change to Outcome 2.

Outcome 2: Enhanced assistance to capacity building, technology and finance in support of the Paris Agreement. UNEP will facilitate interinstitutional collection, sharing and validation of climate-related knowledge and capacity at the national and subnational levels. UNEP will contribute to enhanced capacity and promote cooperation amongst the sectoral ministries that hold stake in the implementation of mitigation and adaptation actions, while also securing greater involvement of subnational authorities in knowledge and data sharing and related decision-making, to facilitate synergies and harmonize efforts. UNEP will further assess the potentials, risks and gaps in relation to measures tackling climate change to increase transparency, accountability and foster knowledge generation. Connecting countries to climate technology solutions. UNEP will provide technical assistance,

capacity building and advice on technology solutions and accelerated access to climate technologies for low ~~carbon~~ **emission** and climate resilient development at the request of recipient countries, including through the Climate Technology Centre and Network and other partners. UNEP will also facilitate the development of enabling policy, legal and regulatory frameworks for technology solutions tailored to the needs of individual countries, by harnessing the expertise of global networks of technology companies and institutions.

UNEP will support the accelerated alignment of private and public finance with the long-term finance goals of the Paris Agreement. UNEP will support the adoption of sustainable business and market models that can facilitate a strategic shift towards low ~~carbon~~ **emission** and resilient pathways in private and public sector investments and long-term planning across all sectors.

Changes to Outcome 3.

Outcome 3: Global climate transparency and accountability are enhanced. In collaboration with its networks and partners, including the UNFCCC and GEF, UNEP will help countries meet their transparency and other reporting obligations under the UNFCCC and operationalize the Enhanced Transparency Framework established under the Paris Agreement.

This will contribute to increasing global confidence in the adoption of business models and market decisions towards ~~decarbonization and resilience~~ **low emission and resilient** pathways.

UNEP will help countries measure progress towards ~~decarbonization and resilience~~ **low emission and climate resilient development** for stronger engagement in the global stocktake process.