

ARGENTINEAN DELEGATION

Comments and Consideration of UNEP Medium Term Strategy 2022-2025

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1.- Section II) Situation Analysis: Unsustainable patterns of consumption and production are overburdening the Earth's resources

Paragraph 12:

Biodiversity can only be conserved, sustainably used and restored by addressing all the underlying drivers of change, including **BUT NOT LIMITED TO** economic factors driving exploitation and destruction of critical habitats, **POVERTY AND INEQUALITY BETWEEN DEVELOPED AND DEVELOPING COUNTRIES.**

We request to include this change, mention other "underlying drivers", or eliminate the mention to a specific driver such as economic factors.

Reference to the underlying drivers of biodiversity loss is considered to go far beyond the scope of UNEP's competence, as it refers to the complex economic and social system that impacts on nature. In this sense, the mere mention of the forms of production that lead to the destruction of natural habitats is reductionist. It is considered necessary to mention poverty and inequality between developed and developing countries as one of the underlying causes leading to unsustainable production and consumption patterns. If such an inclusion is not possible, a mention of the underlying drivers of loss is acceptable, without specifying which ones.

2.- Section IV) UNEP's focus: thematic, foundational and enabling programmes for increased ambition"

Paragraph 42: "Three planetary crises-three interconnected strategic objectives":

"(b) Living in harmony with nature", where ~~humanity prospers in harmony with nature~~
BIODIVERSITY IS VALUED, CONSERVED, RESTORED AND WISELY USED"

We request this change, if not, clarification is requested regarding the resistance to adjust the term to an already multilaterally agreed explanation of what "living in harmony with nature" means. This change has already been reflected in page 19, para 62, why cannot be changed here as well?

The 2050 vision of the Convention on Biological Diversity, which is the 2050 target for nature agreed by the international community, is considered to contain four dimensions that need to be highlighted when explaining its meaning and must be present in this Strategy: valuation of biodiversity, its conservation, its restoration and its use (Decision X/2).

The presence of these four dimensions is central to Argentina and is not reflected in the phrase "where humanity prospers in harmony with nature". For this reason, it is suggested to adjust this mention to what has been agreed in the Convention on Biological Diversity, avoiding implying that living in harmony with nature may have any other meaning than the one agreed by the Member States.

3.- Section Nature Action:

Paragraph 62:

"To facilitate a transition towards living in harmony with nature, in line with the sustainable development goals and ~~the long-term goals of~~ the future post-2020 global biodiversity framework, as agreed by Member States, it is expected that

(a) By 2025 the implementation of the agreed post-2020 global biodiversity framework is well underway through **THE NATIONAL BIODIVERSITY STRATEGIES AND ACTION PLANS AND THE NATIONAL REPORTS** ~~related national planning, implementation, monitoring and reporting processes.~~

We request to adapt the paragraph to the instruments that actually exist under CBD to implement, monitor and report progress (National Biodiversity Strategies and National Reports) or to finish the paragraph in "well underway". Request to avoid a general mention to related national planning, implementation, etc., which content is under discussion and has not yet been agreed.)

~~(b) 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.~~

~~(c) 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.~~

~~(d) 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 can accept leaving the list as it is right now as long as no reference to actions that member states should pursue is included. It has to be noted that many of these expectations have not been agreed under legally binding international instruments.

Additional Comments:

The Post-2020 Global Biodiversity Framework is a document under negotiation in the context of the Convention on Biological Diversity. The current version of the document is a draft proposed by the co-chairs of the Open-ended Working Group. The dynamics of the negotiation process, which has been impacted by the pandemic, have meant that to date no

section of it has been opened for negotiation among Parties, so it is not a text that has been amended or agreed on any of its lines.

The expectations included in the mid-term strategy proposal are far from reflecting the vision that many Parties would like to see for the Global Framework. From Argentina's point of view, for example, there is no mention of crucial aspects that developing countries would expect, including a robust flow of funding, technology transfer and capacity building to developing countries by 2025, as well as the implementation of a mechanism for access and benefit-sharing derived from the utilization of genetic resources that includes the recognition of Digital Sequence Information (DSI) as part of the genetic resource.

If we wish to specify expectations that the Framework must meet by 2025, Argentina would need to include all of our country's preferences in this regard. However, given that there is no mandate to negotiate these expectations within UNEP, it is suggested that all references to UNEP that deviate from previously agreed issues related to the Framework or to the way of implementing the Convention on Biological Diversity, of which the Global Framework will be a part, be deleted.

In this sense, from the list presented, it is considered that the only thing that can be expected by 2025, which does not prejudice the results of the negotiation of the Framework, is that implementation is expected to be advanced. However, it is not considered appropriate to mention general mechanisms that are in the Framework proposal but have not been negotiated by the Parties, such as planning, implementation, monitoring and reporting. It is preferred, in any case, to mention the implementation instruments foreseen by the Convention: the National Biodiversity Strategy and Action Plan and the National Report.

Paragraph 72:

“UNEP will support policies and actions on sustainable consumption and production to conserve, restore and safely manage biodiversity and ecosystems. UNEP will support member states, cities, business and consumers in the re-use, recycling and more efficient and less polluting use of products and materials which tend to have high impacts on nature, including through a value chain approach, **IN LINE WITH MULTILATERALLY AGREED RULES**, and supporting indigenous peoples and local communities.

A value chain approach, when addressed at the international level, may involve trade related aspects. In that sense, this approach has to comply with multilaterally agreed rules, in particular those of the WTO, such as the non-discrimination obligation and the prohibition of quantitative restrictions. Therefore, the reference to "in line with multilaterally agreed rules" is adequate for every mention of value chains.

Paragraph 74:

“UNEP will develop and promote frameworks and norms for biodiversity-related financing and infrastructure. Leveraging the portfolio of the enabling subprogramme on Finance and Economic Transformations UNEP will support the integration of biodiversity and ecosystems

services considerations and related risks into financial and economic decision-making. UNEP will provide **VOLUNTARY** guidance to governments and financial institutions to achieve positive outcomes for people and nature, in line with the agreed post-2020 global biodiversity framework and relevant environmental targets of the SDGs, focusing on economic sectors with high impacts and dependencies on nature. UNEP will also support the development of innovative funding mechanisms for conservation which support indigenous peoples and local communities in livelihood opportunities while building sustainability and resilience and strengthening their rights.

We request this inclusion, if not, we need clarification on why the guidance to governments should not be voluntary.

In view of the principle of national sovereignty over natural resources, it is considered important to emphasize that the guidance that UNEP may provide to governments in relation to the financial aspects of their environmental policies will be voluntary.

Paragraph 76:

UNEP will promote sustainable approaches to natural resource management. **WHEN NECESSARY AND UPON REQUEST**, it will promote transformations in planning and managing land and water use and natural resource-based value chains with a lifecycle perspective. Building on its experience and collaborative partnerships with Agencies with specialized expertise, UNEP will assist Member States in promoting sustainable and resilient food systems, agriculture and fisheries to reverse unsustainable land use, biodiversity loss, habitat conversion, freshwater pollution and abstraction and depletion of freshwater and ocean resources. Sustainable food systems must be based on the maintenance of healthy freshwater, terrestrial and marine ecosystems. UNEP will continue to assist Member States in strengthening the environmental performance of sustainable and restorative agriculture models through promotion of resource efficient practices for nature, including but not limited to agroecology, **SUSTAINABLE INTENSIFICATION OF AGRICULTURE, CONSERVATION AGRICULTURE**, and regenerative agriculture in collaboration with its partners. UNEP will enhance its contribution to these objectives building on its work on, among other things, sustainable land-use, natural capital accounting, sustainable consumption and production, landscape management and ecosystems restoration. UNEP will continue to support countries in restoring, sustainably using and conserving freshwater ecosystems to secure the provision of freshwater for sustainable development of sectors and society. It will continue to support integrated coastal zone management and marine spatial planning and cooperate with relevant organizations. It will also continue to provide guidance for increased knowledge and institutional capacity to implement ~~equitable~~ access and the fair and equitable sharing of benefits arising out of the utilization of genetic resources and catalyse action for the sustainable use of terrestrial, freshwater, and marine ecosystem resources. There will also be a focus on adopting holistic sustainable consumption and production approaches, using indigenous and local knowledge supported by sound science,

data, and statistics enabled and scaled up by public and institutional procurement policies and consumer choice.

We insist in mentioning these two other agriculture systems. In particular, conservation agriculture was recognized by IPBES as a sustainable agriculture practice (IPBES Global Assessment, 2019, P42, Para 36). If there is no mention to all the sustainable agriculture practices that exist, we would rather have a general mention to sustainable agriculture without mention of specific practices.

4.- Section "IV.A.1. Thematic Subprogrammes - Climate Action":

Paragraph 50:

A clear focus on the **UNFCCC AND THE** Paris Agreement. Achieving long-term climate stability will depend on countries making balanced progress towards their mitigation, ~~and~~ adaptation **AND FINANCIAL** commitments under the Paris Agreement, 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", **AND MAKING FINANCIAL FLOWS CONSISTENT WITH A PATHWAY TOWARDS LOW GREENHOUSE GAS EMISSIONS AND CLIMATE-RESILIENT DEVELOPMENT**. A transition towards climate stability, in line with the sustainable development goals, the UN Framework Convention on Climate Change and the Paris Agreement, recognizes that:

- By 2025, countries and legal entities increasingly adopt ~~decarbonization, dematerialization and resilience~~ low emissions and resilient pathways.

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. The proposed paragraph is incomplete in mentioning the objectives of the Paris Agreement. We insist on the inclusion of a reference to commitments on the provision of means of implementation by developing countries. If this is not possible, a general reference to "the objectives of the Paris Agreement" is preferred, but language that does not refer to all three elements (mitigation, adaptation and means of implementation) in a balanced way is not acceptable.

In the first bullet, the scope of the concept of "dematerialisation" is unknown, so it is suggested to avoid its inclusion.

Paragraph 51:

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

As in the previous comment, we request to incorporate in a balanced way the three pillars of the multilateral climate negotiations, as agreed in Article 2 of the Paris Agreement.

Paragraph 52 (b):

2. Supporting countries and stakeholders in achieving rapid, just and comprehensive ~~decarbonization~~ **GREENHOUSE GAS EMISSIONS REDUCTIONS, IN LINE WITH THEIR NDCS**. ~~UNEP will take a value chain and multisectoral approach that demonstrates opportunities to: deploy timely renewable energy and energy efficiency solutions at all geographic levels; halt deforestation and habitat loss; restore degraded ecosystems, harness the potential of oceans and coastal ecosystems; change the way we produce and consume food; adopt more circular economy and resource efficient business practices; and redesign our cities and transportation sectors.~~

We insist on the proposed amendments. In particular, it is suggested to avoid the use of the word "decarbonisation", given its inaccuracy and the lack of an agreed definition. With regard to the references to UNEP's efforts, it is recall that UNEP should support the Parties to the Paris Agreement to comply with the actions and priorities that they define in their NDCs, without imposing on countries actions or issues that they do not prioritize in their national plans.

Paragraph 52 (d):

Promoting policies and actions for sustainable consumption and production practices to reduce greenhouse gas emissions. UNEP will support governments **IN THE IMPLEMENTATION OF THEIR NDCS, AS WELL AS**, ~~and~~ business and individuals in making informed choices to increase production of and demand for goods and services that are more resource efficient and less emissions intensive, 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.

Originally, it was suggested to delete this principle. UNEP support should be targeted to the areas and actions that each Party to the Paris Agreement identifies as priorities for the implementation of its nationally determined contributions. It is stressed that it is inappropriate for the Programme to identify priority areas of work, which are not in line with national priorities.

Paragraph 53:

In collaboration with its networks, UNEP will support countries in taking full advantage of the opportunities presented by decarbonization, ~~dematerialization~~ and resilience and linking these to higher climate aspirations. UNEP will focus on **the priorities identified by Parties to**

the Paris Agreement in their respective NDCs, and will be based on the best available science ~~on sectors with the highest emissions, based on the latest scientifically credible evidence of their share of national emissions and role in ensuring resilience of the socioeconomic fabric.~~ UNEP will design and highlight opportunities for action in these sectors through action-oriented partnerships, including private sector alliances, and supporting the country level uptake of sustainable solutions ranging from ecosystem-based approaches to sustainable technologies and dematerialization practices, in line with national priorities. Special focus will be placed on an evidence-based introduction and uptake of better technologies, including digital technologies, for integration into sectoral and national policies and decisions. UNEP will help countries embed these opportunities in their evolving climate aspirations, linking them to adjustments in the policy and regulatory frameworks that inform Nationally Determined Contributions and Long-Term Strategies, as well as their climate adaptation planning (e.g., early warning systems).

UNEP should orient its action to the priorities defined by the Parties in their NDCs. On the other hand, it is suggested to use agreed language to refer to "best available science" and not to incorporate modifications whose scope is unknown.