

United States Comments on Preliminary Draft Program of Work and Budget 2020-2021

The United States appreciates the opportunity to comment on UNEP's 2020-2021 Program of Work and Budget. We look forward to submitting additional comments when the document contains more detail.

General Comments

- We would like to see additional detail regarding the funds and staffing proposed to be devoted to various programs and program areas. For example, given the importance of UNEP's air quality monitoring program, we were surprised there is no information on the human resources available for this work. It is not clear in the current format if UNEP has the required staff to implement this rigorous program.
- Many sections of the document imply or state that UNEP is tasked with implementing the SDGs, which is not entirely accurate. The SDGs are implemented by countries, and UNEP may support this implementation. This should be clarified.
- The target and indicator tables cross-reference SDG targets, but many of these cross-references are not appropriate. For example, under the Chemicals, Air Quality, and Wastes sub-program, indicators (a)(i)-(a)(iii) reference SDG target 12.4.1, which focuses on reporting under chemicals and waste MEAs, but not on the activities referenced in these indicators.
- All indicators should reference not just what countries and other stakeholders will do, but also what UNEP's role in these actions will be. For example, the chemicals indicators reference actions by countries, companies, and civil society, but not how UNEP will facilitate those actions.
- It will be important for us to see baselines and targets for all indicators in order to fully evaluate the impact of this program of work. For comparison, we would also like to see UNEP's progress in reaching targets included in the 2018-2019 Program of Work and Budget.
- There are several references in the chemicals section to "green design," "non-polluting" and "green chemicals, and other language that we do not believe has been agreed by Member States or included in UNEA resolutions. We have suggested text so that this language is consistent with the existing mandates.
- Paragraph 84 references a "strategic approach to chemicals and waste management." As it is unclear what this refers to, the reference should be removed. This paragraph also references "2020 goals," but we are aware of just one 2020 goal for chemicals management, so this should be clarified.

- The document does not clearly explain the role of the SDGs in the UNEP Programme of Work and Budget or if they are linked to UNEP's *Indicators of Achievement*. The current draft could be interpreted to suggest UNEP is using SDG indicators to measure progress when that may not have been the intention. Furthermore, SDGs that have Tier II or Tier III indicators do not yet have agreed methodology or widely collected data and it is unclear how UNEP will use the indicators in this process.
- The document has minimal references to UNEP's work to reduce food loss and waste, or the work being done to develop SDG indicator 12.3.2 on food loss. It would be helpful to provide more detail on this work stream and implementation of UNEA resolution UNEA 2/9: Prevention, reduction, and reuse of food waste.

Specific Comments on the Budget

- We note that the PWB proposes a \$6.2 million reduction in staff costs under the Environment Fund. Does this proposal indicate a reduction in staff, or does it indicate a shift of staff costs to another part of the budget, whether core, earmarked, or from the global trust funds?
- The proposed PWB would increase the corporate services budget by more than \$2 million. Why? What new needs have been identified that require such an increase? Can you confirm that none of this increase will come out of UNEP's regular budget allocation?
- We note that UNEP will continue to use a biennial budget, though under UNGA resolution 72/266 it is no longer required. We do not have any issue with the use of a biennial budget, but we would be interested to know whether the UNEP secretariat anticipates any administrative complications arising from the Secretary-General's shift towards an annual budget cycle.
 - Comment: see footnote, page 10.
- We appreciate the fact that UNEP has realigned its expectations for the Environment Fund to better reflect actual contributions, which we realize can be politically difficult for the organization. Does UNEP intend to seek an increased allocation from the UN Regular Budget for the 2020-2021 biennium?

Specific Comments on the Program of Work:

We recommend the following changes in specific paragraphs:

- Description of Climate Change Subprogramme, page 20: change the Objective of the organization as follows: "countries ~~increasingly make the transition to~~ increase low-emission economic development, and enhance their adaptation and resilience to climate

change.” There is no one “transition that all countries will undergo; each transition will be different based on national circumstances, and we need to view low /emission development as a continuum and not as a transition from one specific to another.

- Paragraph 38: “~~Guided by~~ Recalling UNEA resolution 2/6 on “Supporting the Paris Agreement” the overall objective of the climate change subprogramme ~~is aligned with taking into consideration the Paris Agreement of the United Nations Framework Convention on Climate Change~~, as well as the 2030 Agenda for Sustainable Development. ~~The subprogramme overall objective is to strengthen~~ increase ~~countries’ transition to~~ low-emission economic development and enhance ~~their countries’~~ adaptation and resilience to climate change. Looking ahead to 2030, the ultimate impact that UN Environment Programme aims to contribute on climate change is to reduce countries’ vulnerability to the adverse impacts of climate change and reduce emissions of greenhouse gases ~~as to close the adaptation and emission gaps~~¹². This impact can be realized in part through support as appropriate to countries ~~and stakeholder~~ for mitigation and adaptation efforts ~~immediate and long term climate action~~.
- Paragraph 39: “In order to achieve this change, UN Environment Programme will address ~~the different elements of the climate action continuum~~ – science, policy, technology, and finance. In 2020–2021, UN Environment Programme will continue support to countries to: (a) build technical capacity, access adaptation finance and set up institutions to coordinate development and implementation of national adaptation plans that integrate ecosystem-based adaptation; (b) develop policies and standards to ~~transform markets and~~ promote investment in clean energy and efficient technology and system solutions; (c) implement policies that achieve quantifiable carbon, social and environmental land-use benefits. As cities are of particular importance in an era of accelerated urbanization, there will be a specific focus on low ~~emission~~ carbon urban development. Throughout its work, UN Environment Programme will implement gender-sensitive actions and promote South-South cooperation. Partnerships will be critical to the achievement of the desired impact.”
- Paragraph 44: “The climate change subprogramme ~~is expected to~~ may achieve its Expected Accomplishments ~~provided by~~ supporting and complementing, as appropriate, the ~~that~~ actions of Member States, including actions to implement ~~their commitments to~~ the United Nations Framework Convention on Climate Change and Paris Agreement, as applicable, but it is recognized that specific actions and targets by Member States are nationally determined. ~~and seek UN Environment Programme support in so doing.~~ ~~Achieving the targets is~~ National action is also ~~contingent on~~ affected by the availability of resources funding and enabling environments that enhance the ability of ~~to enable~~ countries to ~~make the transition to~~ increase low-emission economic development, and to

enhance their adaptation and resilience to climate change. Drivers of change include partnerships, which will leverage climate finance and increase impact, as well as UN Environment Programme methods, tools, assessments and pilots, especially if they are taken to scale by partners.” There are no specific commitments to the UNFCCC. There are nationally determined contributions in the context of the Paris Agreement, but it is not the same thing as the UNFCCC.

- Paragraph 67: Change the last sentence: “For instance, efforts under this subprogramme will complement the work of other subprogrammes on marine plastic litter and micro-plastics and lead contamination and will **implement and** contribute to relevant UN Environment Assembly resolutions.”
- Paragraph 76: “The overall objective of the chemicals, waste and air quality subprogramme is to support countries in their efforts to soundly manage chemicals and waste and improve air quality in order to significantly reduce negative impacts on the environment and human health. Addressing indoor and outdoor air pollution is expected to result in a reduction in particulate matter, tropospheric ozone and other air pollutants that present that largest environmental health risk contributing to the global burden of disease. Addressing over and above the reduction. Poor management of hazardous chemicals and waste that are can also be harmful to human health, agricultural productivity and the environment, and also sometimes have a detrimental impact on our climate Targeting plastic waste will help to reduce marine litter and microplastics, that are at a large scale polluting our oceans today, and reducing nutrients and wastewater are instrumental to avoid water pollution, ecosystem degradation and ill health caused by harmful algae, disease vectors and others environmental health factors. By incorporating the work on air quality, marine pollution from land-based sources and a strong focus on the environment and health nexus, the UN Environment Programme is taking a holistic approach to combating pollution in line with the main outcomes of the third UN Environment Assembly, which met under the theme “Towards a Pollution-Free Planet.”
- Paragraph 90: Include WHO in the list of partnerships.
- Paragraph 100 mentions the “Coalition to Green the Belt and Road,” and states its secretariat is hosted by the UNEP. Member States have not been informed or consulted regarding UNEP’s decision to host this secretariat, and the United States does not agree this is appropriate based on the very limited information UNEP has provided regarding this Coalition

I see on p. 10 that UNEP intends to continue presenting a biennial PWB, though UNGA res 72/266 means that some UN budgeting procedures will shift to an annual basis. Are there any complications you anticipate based on the shift to an annual budget cycle?

