

**Draft Ministerial Declaration of the  
2019 UN Environment Assembly  
“Innovative solutions for environmental challenges and  
sustainable consumption and production”**

Comments by the EU and its Member States

**General comments**

- We thank the UNEA President and the Secretariat for the draft Ministerial Declaration and the participatory process for its elaboration.
- We appreciate the intention to make the declaration action oriented, and see many commitments and actions. However, we envisage that a shorter document with fewer commitments would focus and strengthen the text and the implementation of commitments. We would suggest a text which is less than 2 pages, with fewer and shorter paragraphs on priorities.
- On the Vision and Chapeau:
  - We think that the vision should include a short paragraph that injects a sense of urgency into the discussion, which is recognised by Ministers in an acknowledgement to act. References to sharing of information, knowledge and experiences could be made. Further, prevention and effectiveness should be included in the vision, and the text on SCP should be aligned with SDG 12, which could read: **“Sustainable, prosperous and inclusive societies with sustainable consumption and production patterns that prevent and address environmental challenges with innovative and effective solutions”**. It should furthermore include a reference towards the aim of using gender aggregated data in decision making
  - The chapeau should clearly state that efforts are intended to support the implementation of the 2030 Agenda and the Sustainable Development Goals. The text should therefore be amended, for example as follows: “As ministers of the environment of the world, we recognize that poverty eradication and a healthy environment are overarching objectives and essential requirements for sustainable development, including the achievement of the 2030 Agenda and its Sustainable Development Goals, and that changing unsustainable and promoting responsible patterns of consumption and production and protecting and managing the natural resource base of economic and social development are pivotal means towards these ends.”
- Accordingly, we also suggest to insert a quote from the International Resource Panel (for the time being as a placeholder): *“We note the analysis of the International Resource Panel according to which resource extraction and processing to materials, fuels, and food accounts for more than 90% of global biodiversity and water stress impacts and approximately half of the global climate change emissions (disregarding climate impacts related to land use)“*.

- In the preliminary remarks by the EU and its MS on the draft outline, we emphasized the importance of the concept of circular economy and the need to amplify the promotion of sustainable consumption and production patterns. In our view, the zero-draft falls short in this regard, and we urge that this is included in the declaration as a key issue.
- The draft could be also be enhanced with references to biodiversity and climate action, e.g. with a reference to the Paris Agreement and the outcome of COP 24 (on the Paris Agreement Work Programme) as well as the elaboration to the post-2020 global biodiversity framework. For biodiversity, it could be framed like this: “We commit to accelerate the implementation of the Aichi targets and to foster commitments for and strengthen implementation of the future post 2020 global biodiversity framework, investing in biodiversity for people and planet”.
- Furthermore, a general reference to the 2030 Agenda and the contribution of UNEP and UNEA to its implementation should be made.
- We reiterate the need for a declaration that is attractive to policy makers and the wider audience; a declaration that is short, action oriented and avoids excessive technical language. While we recognize that the zero-draft is already considerably action-oriented, we notice that the text has become significantly longer and can still be considered to be overly technical. A better balance needs to be achieved.

This can either be done by grouping several of the specific actions together or by switching priority 1 and priority 2. Rather than putting the initial focus on data and science, the declaration would then start with the paragraph on action and refer to science and data as supporting vehicles.

- We would urge to limit the calls for new strategies or action plans to those strictly necessary (e.g. those mentioned regarding priority 1).
- A reference to health should also be included.
- A reference to the pollution implementation plan should also be added (possibly in the form of a placeholder).

### **Specific comments**

#### **Main Priority 1:**

- As already mentioned in our preliminary comments, this section is ambitious, yet too technical. This continues to be the case. Furthermore, under this section, there are numerous calls to develop new strategies or action plans and/or new mechanisms. The basis for such calls and their potential linkages with existing mechanisms as well as their consequences on UNEP's Budget and the POW/B are unclear to us. This is for example the case with:

- 1a) Development of a global environmental data strategy and action: How is this linked to existing UNEP data tools and/or to work taking place elsewhere in the UN system (e.g. UNEP Live, UN World Data Forum)? Furthermore, how would the establishment of a HL multi-sectoral task force within the UN Global Science - Policy - Business Forum on the Environment be realised, given that this Forum is in fact a two-day meeting during UNEA? It is crucial to be realistic and to avoid overlap with other global initiatives.
- 1b) Strengthening existing and establishing new environmental monitoring systems: Which existing systems are foreseen to be strengthened, which new ones are foreseen to be developed? Does this relate to systems under the auspices of UNEP, or rather to systems under the auspices of the Member States themselves?
- 1d) How do these new commitments relate to what is already being done by Member States?
- 1f) Invite ED to establish a dedicated programme for building global environmental data management capacity: Please clarify as to the degree of overlap between UNEP-Live and such a new programme. We would prefer to support the further strengthening of this existing system through the MD. Furthermore, we suggest to introduce the concept of linking national and regional levels and to feed these outcomes into the global level of data management and assessments.
- A message of precaution on the environmental impact of the digital revolution (WEEE, energy consumption, etc.) should be added.
- A reference to the IRP Report (currently GANRUM, but name to be re-defined) should be added in Para 5 of Main Priority 1.
- We also suggest to include a point on the importance of streamlining existing reporting processes, e.g. on the GEO process there is clearly a need to feed the regional assessments into the global level.
- We would support a message on a close dialogue on and utility of environmental assessment information and real time data products and analysis by national information and operational services to support evidence-based decision-making.

#### Main Priority 2:

- We welcome the inclusion of SCP and circular economy. It is essential that these are retained in the text in a sufficiently strong manner.
- More specific comments/questions for clarification:
  - 2b) request for ED to strengthen support for Member States' capacity building in this area: UNEP already has a dedicated programme on resource efficiency and builds capacity for SCP through it. What would be new? Furthermore, should a strengthening of this programme not be reflected in the SCP resolution and/or POW/B?
  - 2c) sustainable land management measures is also relevant for ecosystem-based adaptation. Reference to this would be welcomed.
  - 2e) define priority actions for sustainable tourism: where and how will these priority actions be defined? Sustainable tourism is already part of the POW/B
  - 2g) ...policies in line with waste hierarchy: there are many different waste hierarchies. Which ones are meant here?
  - 2h,2i) how feasible is it to agree on specific targets? Which percentages would be envisaged and on which basis are these calculated? How would this relate to SDGs targets and indicators or to other existing international targets?

- 2h) We would welcome the following addition at the end: “while hazardous substances are minimized or eliminated”
  - 2j) We would welcome also specific reference to “plastic marine litter”, given that this will be a key issue at the Basel COP one month after UNEA. It could read like this: “commit to finding proper solutions for the global challenge of marine litter pollution, especially by plastics, both on a governance level as well as in concrete measures to take, inter alia on waste management and raising public awareness.”
  - 2l) We would suggest the text to read: “We agree to achieve that at least [X]% of total procurements will be green public procurement”. We generally support the idea of a commitment to sustainable public procurement but will need to look precisely at the corresponding quantitative objective.
  - The EU generally uses the word green public procurement, as the two concepts are not identical. See EU 7th EAP.
- A reference to the Paris Agreement and climate action should be made, e.g. with references to NDCs and long-term strategies. This could be phrased like this: “Recognising the urgency to take action, as reiterated by the IPCC Special Report on Global Warming of 1.5 Degrees, we commit to accelerate the implementation of the nationally determined contributions under the Paris agreement to ensure the achievement of its long term goals.
  - A reference to SAICM and the 5<sup>th</sup> International Conference on Chemicals Management should be made. We would also like UNEA-4 to have a message to develop a global approach for the sound management of chemicals and waste beyond 2020, to protect the environment and human health against harmful chemicals and waste, to be considered at UNEA-5.
  - In addition to SAICM, there should also be a reference to the chemicals and wastes conventions, the implementation of which will be important to achieve SDG 12.4 and 3.9.
  - We suggest to add a new point: “to promote and to incentivize new business models which enhance resource efficiency and SCP.”
  - We suggest to promote alternative circular business models in buildings and construction, based on resource efficiency, renewable resources, circular construction principles, longer and diverse product life cycles, shared consumption and interconnected value chains.
  - We suggest to call on the UN to support the improvement of the governance of natural resources and raw materials by bringing about an agreement on relevant environmental standards based on existing schemes and initiatives and invite the Executive Director to establish a dedicated working group of governments and relevant stakeholders.
  - A message to strive to establish non-hazardous (or non-toxic) material flows from the primary product to the recycling product by avoiding and phasing out substances of concern as early as possible.
  - In the context of sustainable and innovative financing opportunities, a reference to work towards making financing flows consistent with a pathway towards GHG emissions and climate-resilient development should be made.

We suggest to add a point on SCP of pharmaceuticals and links to anti-microbial resistance.

Main priority 3:

- We miss a reference to sustainable lifestyles and the need for awareness raising and advocacy.
- We would welcome the inclusion of the role of local authorities.

- 3d) focuses only on innovation. This would need to be balanced with reference to SCP.
  - 3g) We would like to suggest the specific mentioning of the financial sector, given its important role.
  - The need to support engagement of the private sector is not well reflected in the list of actions. We could propose stronger language on the role of the private sector, e.g. encourage / incentivize businesses to adopt SCP practices (and possibly add a reference to product sustainability information, which would complement the actions above on disclosure of consumer information and on products sustainability criteria.
  - We also suggest to add: “We empower our citizens to identify and address environmental and climate challenges, improving their access to information on environmental and climate footprints of products and services, and enhancing their involvement in environmental and climate decision-making.”
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