United States Comments Fourth UN Environment Assembly zero draft Ministerial Declaration

The United States appreciates the opportunity to provide input on the zero draft Ministerial Declaration. We continue to believe a non-negotiated Outcome Document, such as a Chair's Summary, would be a more effective product, particularly given the number of resolutions to be negotiated at UNEA-4. Without prejudice to that position, we submit the specific suggestions shown as tracked changes in the attached document, and the following comments:

Main Priority 1

- Paragraph a proposes creating a "new global environmental data strategy and action plan." The purpose of this plan is unclear, as is its link, if any, to the World Environment Situation Room. We suggest a preliminary step, such as establishing a task force to investigate the need for a new strategy. We are also concerned about the utility of developing such a strategy; several UN specialized agencies, including WMO and IOC, have data strategies and it does not appear they are being accommodated here. How would this new strategy relate to the ongoing work of the Group on Earth Observations?
- The United States has concerns about the call in paragraph b to enhance or establish a new environmental monitoring system to ensure open access to data. Ensuring open access is a separate issue from enhancing or establishing a monitoring system, and the existence of a system does not ensure open access. Moreover, establishing monitoring systems is a significant and costly endeavor, whether it is done globally or independently in countries. We believe a more realistic goal is to harmonize domestic systems in order to arrive at a globally relevant product. An alternate and more workable goal might also be to develop a set of recommendations for data standards to promote interoperability and exchange.

Main Priority 2

- The language in paragraph f inviting UNEP's Executive Director to establish a dedicated program for building global environmental data management capacity is a concern. A new initiative of this magnitude should be considered within the process of approving the Program of Work and Budget. In addition, a preceding paragraph in the draft Declaration calls for the development of a global environmental data strategy and action plan by 2021. It seems premature to build a program for global environmental data management before that plan exists. We would also like to understand the purpose of such a program. Is it meant to help developing countries determine how to manage environmental data within their countries? Is it meant to be a comprehensive worldwide data management system? How would such a product relate to existing efforts to manage global environmental data?
- The United States does not support calls for specific targets and deadlines, such as the proposals in paragraphs h and l to reduce waste and achieve sustainable procurements by "x%." It would be more practical for Member States to establish baselines and targets

based on their own unique circumstances. In addition, terms like "waste" need to be defined. Regarding targets related to more sustainable public procurement, a significant amount of public procurement is food and there are no agreed standards for sustainable food certification/labeling.

• The United States does not agree to developing a new "global approach and efforts for long-term funding" for chemicals and waste beyond 2020 in paragraph i. We do not agree that a new global approach or new long-term funding are needed, and we believe this could hinder or undermine the SAICM re-negotiation process. We do not agree that developing a new global approach is an essential requirement for the achieving the 2030 Agenda goals.