

UN Environment Programme CPR Subcommittee 8 November 2018

EU and its Member States' comments on

Implementation Plan

"Towards A Pollution Free Planet"

General comments:

- The EU and its Member States (EU+MS) appreciate UN Environment Programme's (UNEP) work on the Implementation Plan. As mentioned in our comments submitted in October, in general we welcome the approach and the structure of the implementation plan.

- In our view, the final plan should be as action-oriented and precise as possible and it should be clear how it relates to the Programme of Work and Budget (PoW/B).

- The EU+MS seek clarification on the upcoming calendar towards the adoption of the implementation plan and on the foreseen modalities to give sufficient time to Member States to react to a complete draft, including its associated budget.

On the content and elements of this new proposal:

- EU+MS support in general the proposed objectives of the plan and its relevance to the contribution to achieve the 2030 Agenda and its SDGs. We also support the action areas.

- However, we have some suggestions for further improvement:

- *Add an objective aiming to increase the linkages of the implementation plan with other related fora and global efforts, such as SDGs, MEAs and key strategic approaches, including SAICM.*
- *Under "Scope and target audience", we would welcome a reference to people, whose livelihoods are affected by pollution.*

- The success and impact of the Implementation Plan will depend on the scope, focus and ambition of the voluntary action and partnerships that it will be able to catalyse. Therefore, part 2.3 (Mobilizing partners and stakeholder) of the implementation plan is crucial. The mobilization of partners and stakeholders is a key element. We would appreciate a clearer mobilization strategy (what incentives or targeted actions will be put in place for partner organizations to join, what form partnering will take? Will it remain informal?).

- On the knowledge-sharing & innovation platform, it will be key to ensure that it will be user-friendly and easy to access to enhance its knowledge sharing potential, yet we stress the need to avoid a duplication of existing efforts in this field (e.g. GGKP, the 10YFP SCP clearing house, and other existing platform).

- In light of this, we believe that more thought should be given on how these different platforms - in which UNEP is engaged – can be linked and strengthen each other. Coherence is very important in this regard. Furthermore, we believe it is essential that it be ensured that relevant assessment

products from UNEP and other relevant processes, such as the GEO, the Global Chemicals Outlook, GSDR, etc., as well as from MEAs, feed into this platform.

- We support the development of a follow-up process for the implementation of the activities. However, the process should be lean and efficient and mainly aim to involve the Member States themselves rather than place the workload on the Secretariat/UNEP.

- We note that voluntary self-reporting on UNEA 3 and future commitments is highlighted as an important component of the plan (page 7 and page 29, deliverable 1 of action area 5). Reporting on commitments is indeed important. We, however, seek clarification on the modalities and the form of the envisaged self-reporting process.

On the relationship with the PoW/B:

- EU+MS thank UNEP for the estimated indicative budget for coordination.

- It is, however, still unclear, which activities will be taken up under the existing PoW and its sub-programmes in 2019, including the estimated impact of related budgets. We would appreciate further information on this, as foreseen in part 4.2.2.

- For 2020-2021: EU+MS consider it important that based on the estimated costs, the proposed PoW/B 2020-2021 should include two options: with and without the implementation plan, specifying its precise budgetary implications in terms of core and earmarked funds to the relevant sub-programmes.

- It is also not clear what would fall under the umbrella of the budget for “coordination” proposed. Would, for example, the regular report and the platform be covered by this indicative budget? EU+MS would like to have a full budget, including indicative costs for each proposed deliverable and if these are supposed to be delivered through UNEP’s PoW or thanks to partners.

- As the implementation plan is heavily reliant on cooperation in its implementation, the cooperation on resource mobilization with other stakeholders, incl. UN relevant bodies and Multilateral Development Banks, is welcomed.

On governance and process:

- We appreciate the further clarification of the proposed governance structure.

- In general, we appreciate utmost transparency and inclusiveness throughout the process. The institutional structure should enable swift implementation and should therefore be as lean and efficient as possible.

- We note that the implementation plan is to be seen as living document, and welcome the idea of linking UNEA 3 and 4 and future UNEAs. However, a long-term plan requires some stability and we would like some clarification on what components of the plans are supposed to be seen as ‘living’?