

**Draft UNEA 3 Implementation Plan “Towards a Pollution-free Planet” of the  
2019 UN Environment Assembly  
“Innovative solutions for environmental challenges and  
sustainable consumption and production”**

Supplementary Comments by the EU and its Member States

**General comments**

- We thank UNEP for having taken on board a number of comments we made in the past. This is welcome and appreciated. We also refer to our general comments submitted following the subcommittee on November 8<sup>th</sup> 2018.
- We would welcome a reference in the document to the recently announced Global Plastic Platform (GPP) as future instrument to reduce pollution. We would also welcome a placeholder for the upcoming global assessment reports (the GCO, GEO and the GAHP).

**Specific comments**

- In the Introduction and summary, under table 1, concerning the part on "Main expected outcomes", we would appreciate the inclusion of the following sentence: *"Countries have effectively implemented international conventions, frameworks and approaches they have agreed to be part of, or similar measures for the achievement of the sound management of chemicals and wastes."*
- As regards part 3, Key action areas to address pollution challenges, SAICM is only briefly mentioned in the plan. We think a specific reference to the implementation of SAICM is important. This should include a reference to SAICM's "Overall orientation and guidance for achieving the 2020 goal of sound management of chemicals" (OOG) as a priority for the implementation plan to contribute to, including to the implementation of the globally harmonized system of classification and labelling of chemicals (GHS).
- An important element that should also be included in the document is the use of effective incentives to promote pollution reducing technologies and actions (in relation to production and consumption), e.g. through nudging, the removal of subsidies with adverse effects, differentiation of taxes and charges etc.
- We recommend building on the strengths of multilateral environmental agreements to tackle pollution and hence we would welcome a reference to the role of Regional Seas Conventions in page 16 point, 2.3.1. These Conventions are of critical importance and they should be explicitly listed among the relevant MEAs, especially those that have Land-based sources of pollution protocols and those that have legally binding Marine Litter Action Plans. If we take into account that 80% of ML is land-based, this needs to be elaborated in the text. Therefore, the list of RSCs needs to be elaborated in Table 2.

- Some of the RSCs have developed SCP policies including SCP Action Plans and initiatives that interlink RSC with Basel, Rotterdam and Stockholm Conventions (e.g. Barcelona Convention). This would need to be reflected in the relevant parts of the text.
  - The annexes would need to be complemented by mandates from UNEA 2 resolutions (especially the resolution Oceans and seas) and therefore, there will be a need to elaborate the mandates for ML and micro plastics for all Actions Area so that the references to the mandates given to RSCs are clearly elaborated. References on the tasks of RSCs in addressing actions areas are missing and should be clearly elaborated, which closely complements any work under platforms and initiatives. However, the programs of measures mandated under RSCs and based on legal obligations undertaken by the Contracting Parties are crucial at the sea-basin level for overall implementation of Pollution implementation plan.
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