

UNEA 3 implementation plan – "Towards a Pollution Free Planet"

***Draft EU and MS comments
to be submitted to the Secretariat by 18 October***

General comments

- We appreciate that UNEP's work on the Implementation Plan is picking up speed. While many aspects remain to be further specified, we welcome the approach to the implementation plan and the proposed outline overall.
- 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 POW/B.
- On the relationship with the POW/B:
 - One of the main elements that needs to be defined as soon as possible is a budget proposal.
 - For 2019, it should be clarified what activities will be taken up under the existing POW and its sub-programmes, including the estimated impact of related budgets. We would appreciate further information on this.
 - For 2020-2021: EU/MS consider it important that based on the estimated costs, the proposed POW & Budget 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 subprogrammes.
 - As the implementation plan is heavily reliant on cooperation in its implementation, financial cooperation with other stakeholders, incl. UN relevant bodies and Multilateral Development Banks (for certain deliverables) should be considered.
- On the content and elements of the proposal:
 - EU/MS support the proposed objectives of the plan and its relevance to the contribution to achieve the 2030 Agenda and its SDGs. In particular, the links to the most relevant SDGs and targets, such as SDG 12 and 3.9, could be emphasized. Further links could be made with action undertaken to support the implementation of relevant conventions and other relevant international processes, not least within the chemicals and wastes sectors.
 - The success and impact of the Implementation Plan will depend on the scope, focus and ambition of voluntary action and partnerships that it will be able to catalyze. The implementation plan should therefore include a section dedicated to a specific outreach/partnership-strategy and related activities by UNEP to leverage relevant action, partnerships or alliances. It should also be elaborated how the results and outcomes as well as best practices with promising "on the ground" results are communicated to UNEA.

- We support the proposal to develop roadmaps on the different action areas. With regard to the two cross-cutting flagship initiatives proposed, we welcome the idea of a regular synthesis report on pollution. 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 that light, 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. 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 the platform.
- On governance and process:
 - We would appreciate further clarity and more detailed information regarding the proposed institutional and governance structure, including the proposed Pollution Solution Center (as introduced in Figure 3) and the proposed steering committee.
 - In general, we appreciate utmost transparency and inclusiveness throughout the process.
 - We would appreciate further clarification as to how the implementation plan and relevant outcomes of UNEA 4 are intended to interact.
 - Finally, UNEP should clarify how it is envisaged that UNEA 4 adopts the implementation plan.

Specific comments – Annotated Draft Outline of the UNEA 3 Implementation Plan

- First of all we wish to note the links and differences between the "Towards a Pollution Free Planet" (in the note to CPR) and the "Beat Pollution" (in the annotated draft outline of the implementation plan) campaigns. We stress the importance of coherence between the documents and request for further streamlining, especially in the outline document.
- Add elements to the **Table on pages 1-2** and where appropriate throughout the text to ensure consistency:
 - In the "*objectives*" section:
 - *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.*
 - *Promote dedicated and effective national administrations adequate for addressing pollution.*
 - In the "main expected outcomes" section:
 - *A clear reference to improvements on the ground are missing. Without any change in the situation in the field, an implementation plan would be rather fruitless.*
 - In the "scope and targeted audience" section:

- *We would welcome a reference to people, whose livelihoods are affected by pollution.*

- Add references to private sector sustainability reporting (especially in the field of pollution minimization) should be included; especially in the parts of the text that refer to mobilizing stakeholders
 - **In Part 2 – The approach to the implementation plan:** References to relevant MEAs and the SAICM "Overall orientation and guidance"¹ and their implementation should be included.
 - **In Part 3 – Key action areas to address challenges to act on pollution:** "Methods and approaches" should be specifically mentioned as part of action area 3 on "infrastructure". This in addition to technology, since some effective methods and approaches may not rely on technology in the common understanding of the term. Standards (for product categories) should be specifically mentioned, especially in relation to promoting circularity. The report on soil pollution (resolution UNEA3/6) should be added to the list of reports in the "Science base of environment and health risk of pollution to health" section of the figure for action area 1.
 - **In Part 4 – Coordination and resources:** We would welcome a reference to further collaboration with relevant UN and other international agencies, such as the WHO, FAO, World Bank, UNITAR and others and efforts related to the 2030 Agenda more generally, as well as development banks and insurance companies, also drawing upon the UNEP Finance Initiative ².
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SAICM "Overall orientation and guidance for achieving the 2020 goal of sound management of chemicals": ¹ <http://www.saicm.org/Portals/12/Documents/OOG%20document%20English.pdf>

² <http://www.unepfi.org/psi/the-principles/>