

Canadian comments on the revised 16 March version of the UNEA input to the High Level Political Forum:

General comments:

- The mandate of UNEP and UNEA is focussed on the environment and to ensure the environment is at the core of, and a key enabler for SD. This key message needs to be front and centre in the communication from UNEA to the High Level Political Forum. As such the report has to focus on the environmental dimension and the outcomes of UNEA-4.
- In the interest of practicality and time, we provide a few comments below to address some factual errors and add clarity.
- The term “environmental rule of law” is used a lot in the UNEP context and referred to several times in this document. We are not sure everyone has the same understanding of what this is. In one instance below (page 7), we have provided alternative language which could help with clarity, in the context of that particular paragraph.
- We find the term “consolidate” referring to environmental rule of law in the document, is ambiguous and confusing (appearing several times as per below). We would like to see the term removed.

Specific comments:

Page 2, third bullet:

We suggest the following edits:

*The HLPF should call for strengthened action to ~~consolidate and~~ reinforce environmental rule of law and good governance, **including by ensuring sectoral laws take into account environmental obligations and good governance.***

Top of page 5, the titles of the UNFCCC and the Paris Agreement should be corrected to read: **the United Nations Framework Convention on Climate Change and the Paris Agreement.**

Page 7, middle of the first paragraph, we suggest the following edits:

*Rising environmental crimes stemming from weak ~~environmental~~ rule of law **and a lack of respect and enforcement of environmental laws increase the risk to** ~~provide a conduit through which violence against environmental defenders is perpetrated,~~ particularly in marginalized communities. Each week, 4 environmental defenders are killed on average defending the environment and empowering local populations; and for every one person killed, 20 to 100 others are harassed, sued or arrested. **The understanding of, respect for, and enforcement of, environmental rule-of-laws – which describes the context in which laws are to be widely understood, respected, and enforced, with the benefits of environmental protection enjoyed by people and the planet – is key to addressing this implementation gap and need to be strengthened in order to ensure protection of the environment and of people.***

Page 9:

- 2nd paragraph, first line, it should say “**Post-2020 Global Biodiversity Framework**” rather than “post-2020 frameworks for biodiversity”. There will not be several frameworks and this is the correct name.

- We also suggest the following edits:

*Strengthening ~~and consolidating~~ the environmental rule of law and good governance as well as mainstreaming **these concepts into** sectoral laws: Environmental ~~rule of laws~~ and good governance provide a powerful pathway to achieving a broad spectrum of the SDGs. Through the Montevideo Programme for the Development and Periodic Review of Environment Law, UNEP supports member States and relevant stakeholders **to** strengthen environmental laws and their implementation and enforcement, including in the fight against environmental crimes and the protection of environmental defenders across the globe. In particular, the fight against illegal trade in wildlife requires active engagement of indigenous peoples and local communities. The HLPF should call for strengthened action to ~~consolidate~~ and reinforce environmental rule of law and good governance, **including by ensuring sectoral laws take into account environmental obligations and good governance**. The importance of community-based approaches should also be especially be highlighted as they are frequently written off as ineffective, even before the necessary effort has been made to put in place the conditions that will make them effective. Building robust opportunities for indigenous peoples and local communities to be heard and to exercise their rights at all levels is critical in promoting effective wildlife conservation strategies and ensuring environmental rule of law.*