



**United Nations Environment Programme
Committee of Permanent Representatives
152nd Meeting**

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**Remarks by Brazil on item 6
Medium-Term Strategy 2022-2025
Programme of Work and Budget 2022-2024**

as delivered by Mr. Patrick Luna,
Deputy Permanent Representative of Brazil to UNEP

Mr. Chairman,

I would like to start by thanking the Secretariat for preparing a revised version of the draft Medium-Term Strategy (2022-2025) and draft Program of Work and Budget (2022-2023) ahead of this meeting, incorporating guidance provided by Member States in the previous discussions. Taken together, both documents amount to over a hundred pages. Looking forward, my delegation suggests that further revisions be presented with track changes. Otherwise, it becomes challenging - at least for smaller delegations - to follow the updates and to contribute to the improvement of the MTS and PoW.

Brazil is pleased with the overall direction that the process is taking. At the same time, we note that some outstanding issues that have been consistently raised by a number of delegations have not yet been met with adequate formulations in the MTS and PoW, such as the recognition that poverty eradication unfortunately remains today's greatest global challenge for sustainable development, particularly as the world grapples with the recovery of a pandemic that has been claiming lives and threatens much of the social and economic achievements of the past years.

Mr. Chairman,

Rather than indicating the paragraphs Brazil applauds, which are many, I will now focus on some of the specific issues that, from our vantage point, still require further work.

Brazil reiterates that the MTS should recognize that, in addition to the moral challenges they pose, inequality and poverty can also trigger negative impacts on the environment. None of the three environmental crises identified in the situation analysis can be solved without significant advancement in social and economic development, particularly in developing countries. The eradication of poverty should be presented as cross-cutting concern in the MTS and be embedded in each of the three strategic objectives on climate, nature and pollution.

Mr. Chairman,

Like many other delegations, Brazil has been underscoring that the MTS and PoW must be aligned with the implementation of the 2030 Agenda, accelerate the achievement of the SDGs and be fully consistent with the multilateral environmental agreements and universally agreed-upon language.

We appreciate that the expression “nature-based solutions” has been replaced with the concept of “ecosystems-based approaches” (except in footnote 89), so as to align the text with our consensual vocabulary. We note, however, that both documents still use the adjective “green” as a qualifier to a significant number of nouns - such as “green technologies”, “green finance”, “green recovery” and “green choices”, to name just a few. Since there is no multilateral understanding on what this adjective means in these contexts, Brazil would suggest referring to the adjective “sustainable” instead. While some paragraphs of the draft MTS also allude to a “transition to the circular economy”, Brazil notes that this language should be put in line with the conceptual understanding contained in Resolution 1 adopted at UNEA-4, according to which circular economy is one of the many pathways to achieve sustainable consumption and production.

Brazil has been supporting the notion that this is an MTS for the Decade of Action. From our vantage point, this means that UNEP should be better positioned to assist Member States in the achievement of the environmental dimension of the goals we have put to ourselves for 2030. References to a post-2030 period should be made with the utmost caution, so as not to prejudge existing and future intergovernmental processes.

Brazil also considers that, in the road to 2030, UNEP could do more to ensure that the all agreed-upon goals are fulfilled, including on the financial commitments by developed countries in relation to official development assistance and other mechanisms contained in environmental treaties. The involvement of the private sector, which is indeed crucial, should not be presented as an alternative to North-South cooperation regarding means of implementation, an issue that the document still fails to address.

The draft MTS and PoW should also be careful not to address issues that fall outside of the purview of UNEP altogether. A few paragraphs still touch on questions that, from our vantage point, pertain to peace and security. Others, particularly regarding "finance and economic transformations", can inadvertently encourage trade barriers that are inspired by goals different from environmental ones.

Mr. Chairman,

Like many other delegations, Brazil has been drawing attention to the issue of how the draft MTS and the PoW position UNEP in its relationship with the MEAs and other UN organs. The coordination role assigned to UNEP in paragraph 88 of "The Future We Want", and the quest for synergies emerging thereof, cannot lead us to turn a blind eye to the legal autonomy of each MEA, in line with Article 34 of the Vienna Convention on the Law of Treaties. Coordination must respect the mandates and scopes of each MEA, and synergies will be positive to the extent that they rationalize administrative costs and generate improved conditions for Member States, in particular developing ones, to discharge their commitments according to the treaties. In this regard, there is room for improvement in the draft MTS on all three thematic subprogrammes.

The language in the chapter dedicated to "chemical and pollution action", for instance, should make it even more clear that the MTS does not prejudge ongoing consultations on the post-2020 framework on chemicals. The chapter on "nature action" indicates that the MTS will position UNEP to assist in the implementation of the post-2020 framework on biodiversity, another ongoing process. From our vantage point, it would be preferable if it indicated that UNEP will assist Member States in achieving all three objectives of the Convention on Biological Diversity, including the implementation of the Nagoya Protocol.

Brazil notes that the chapter on environmental governance of the PoW does not reflect accurately the third objective of the CBD, the fair and equitable sharing of the benefits arising out of the utilization of genetic resources. We suggest that an additional item be included, on legislation aimed at the implementation of international arrangements for the payment of ecosystem services. Regarding the interface between biodiversity and digital transformation, the documents should also recognize the challenges associated with the use of digital sequence information (DSI), without due regard to the sharing of benefits. In the PoW, the paragraphs on "living in harmony with nature" seem to neglect both the third objective of CBD and the well-established environmental law principle of common but differentiated responsibilities in what relates to means of implementation.

Turning to the subprogramme on "climate action", Brazil takes this opportunity to recall that our efforts are anchored in the UNFCCC, therefore references to this treaty should be included in the text. By referring solely to the Paris Agreement in many paragraphs, the draft MTS overlooks some commitments on finance and transparency. Also, Brazil considers that UNEP's availability to support Member States should be flexible enough to

cover, upon request, measures and policies that are not contained in their NDCs but also might lead to the reduction of emissions.

Mr. Chairman,

I will now turn to the sub-programme on science-policy, which relates to a foundational mandate of UNEP. Brazil highlights that science must be prepared in a multidisciplinary approach, and that more attention should be given to the scientists in the developing world. The scientific inputs provided by UNEP must be based on solid and impartial information, make use of reliable databases and define its methodologies based on fair baselines. Incomplete scientific data can mislead policymakers, exacerbating problems rather than contributing to solving them. Brazil notes that, in the draft PoW, UNEP proposes to take an active role regarding 26 indicators for the SDGs, some of which lack internationally established methodologies. In doing so, UNEP will be expected to fully engage with the academia of developing countries and avoid misleading causal relationships.

Thank you, Mr. Chairman.