

SUPPORTING DOCUMENT II.I

Compendium of comments to the System-wide Strategy

**United Nations Children’s Fund (UNICEF)- Alex Heikens, Senior Adviser Climate and Environment
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UNICEF would like to propose “Children and the Environment” as an additional cross-cutting theme under Areas of enhanced collaborative partnerships for coordination.

United Nations Forum on Forests (UNFF) - Hossein Moeini-meybodi, Senior Forest Policy Officer

General Comment:

Sections 1 "General background" and Section 2 "Situational analysis" should review the current state of play in the coordination on the environment within the UN system with a particular focus on enhancing collaboration among the existing interagency networks and building on their work. These interagency mechanisms include wide variety of networks, dealing with specific issues such as the EMG, UN-Energy- UN Water, UN Ocean, and CPF. Some like the CEB deals with broader system-wide issues. In discussing this paper, it is important to understand how the proposed strategy intends to build upon the existing inter-agency processes and coordination mechanisms.

Specific Comment:

Section 1 on the general background further highlights the need to :

"As an integral dimension of sustainable development, the environment is inseparable from economic and social development: environmental sustainability is locked together with economic and social development as the foundation underpinning those processes. Furthermore, environmental issues, in particular those of global concern to the international community, are inherently multidimensional and the various subsets of environmental, economic and social issues and interests are interconnected."

We are in full agreement with the above statement. While, UNEP is the authoritative body within the UN on the environmental issues, it is of critical importance that the EMG works closely with and builds on the work of the other interagency mechanisms and networks. This will help to ensure that the interconnection of three pillars of sustainable development are reflected properly in the work of different interagency mechanisms.

Regarding the Vision (section 4), the following is stated:

"a) Medium-term vision:

Coordinated and coherent United Nations system wide integrated response to important and emerging issues of global concern in the field of the environment, especially to fill the gap between commitment and implementation of internationally agreed environmental objectives and goals, bearing in mind post 2015 development agenda"

In regard to coordination on specific themes, such as forests, the text mentions the need to create collaborative partnerships (see section 5, Strategic direction, caput); moreover, the text seems to indicate the need for establishing new coordination mechanisms and processes. As indicated earlier, instead of creating new coordination mechanisms, it is rather necessary to focus on how the proposed strategy can mobilise the existing collaborative partnerships for more effective coordination, for which medium and long-term vision as well as common policies and approaches would be useful as set out in the text. In the case of forests there is already a Collaborative Partnership on Forests - CPF, created to support the work of UNFF and where UNEP is represented. CPF can certainly be enhanced to allow for more deep discussion of the environmental aspects of Sustainable Forest Management.

In terms of resource tracking (7.), implementation structure (8.), and reporting and accountability (9.), as well as monitoring (10.), the proposed strategy should make use of the existing EMG, CEB and other inter-agency coordination mechanisms to avoid the fragmentation and duplication of the system. The EMG can also enhance its work modalities (currently it has few meetings which mostly deal with specific projects and themes) and have additional meetings, with broader agendas where the environmental aspects of themes are discussed and coordinated. They may include longer in person meetings which may happen in the margins of UNEP's CPR and UNEA, for instance.

United Nations Economic Commission For Europe (UNECE)- Marco Keiner, Director Environment Division

The mandate and ECE support

UNEP has received a clear mandate to coordinate system-wide work on environment. To do so, using the platform EMG, UNEP proposes a draft outline for a UN system wide strategy on the environment. ECE supports UNEP in fulfilling its coordinating role.

Main scopes of the proposed strategy are to avoid overlapping and duplication of work in the UN system, to strengthen collaborative partnerships among UN system organizations in the field of environment, and to optimize the use of resources. The strategy would be an umbrella instrument for the coordination of environmental activities of all other UN organizations. It would respect the mandate and autonomy of the respective organizations, but also asking them to contribute to reporting, monitoring, evaluation, and to accept the existence of medium and long-term plans with set priorities, and also accept remedial actions where performance indicators show low performance.

Roles and responsibilities of partners under EMG

Based on these observations, there are some general questions that must be considered in the further development of the strategy: How will be the repartition of roles? Who will assess and decide where duplication and overlapping of work exists and who has to abandon which areas of work? Who will it be to analyse and highlight where and in which organizations available resources could be used in a better way? What will be the future role of the EMG? Will it continue to be the consultative instrument it is now, or will it take over the above tasks?

A sentence in the strategy says: "The United Nations system-wide strategy will encompass a number of sub-strategies pertaining to specific thematic issues, some of which may already exist under the leadership of a specific United Nations body or specialized agency." This means that the strategy is intended to allow different organizations and bodies to continue to be active and to lead on some

thematic issues where they are strong and clearly already in the lead. This is something ECE finds to be important as there are areas where ECE is a strong and active leader in its region.

The strategic priorities set out in the proposed medium and long-term plans under the strategy could be perceived as superseding already existing work plans, for example, under MEAs. Would Parties accept the existence of such UN-level plans (which could even contradict the workplans adopted by the MEA's Meetings/Conferences of the Parties)? Who will be the author(s) of the system-wide plans? And who actually will undertake the proposed evaluations? The same question must be answered for the proposed establishment of a "financial resource tracking mechanism": Who will track the resources of whom? This item of the strategy needs much more elaboration in the draft outline, based on forthcoming discussions in the EMG SOM.

Para 8 of the draft strategy states that "It is hoped that through the endorsement of a United Nations system-wide strategy by States members of the respective organizations through their governing bodies, the strategy will be integrated into their policies and programmes into the field of the environment." For ECE, that would mean that the Commission Session / EXCOM would need to endorse the strategy and delegate its implementation down to the Committee on Environmental Policy (CEP). Such an approach could be perceived as a system-inherent top-down approach, sidelining the CEP and the independent MEAs, and undermining their autonomy and competency.

Reporting

The proposed strategy is built on the "classical" UN approach, which is stocktaking of who does what in the system. It can be expected that extensive questionnaires will be sent out to all participating organizations. The draft strategy also stipulates that "Reporting is based on i) key performance indicators – measured against agreed common policies/standards/norms that are applied across all entities, departments and offices of the United Nations system, ...". Such could interfere and overlap with what ECE already has as indicators of achievement in the strategic framework of the sub-programme Environment on which it already has to report on. On the other hand, the draft strategy wants to "Propose system-wide key performance indicators on environmental integration (based on strategic priorities set out in the medium and long-term plans) to provide a high level measure of how the strategy is being implemented." If understood correctly, it means that the performance indicators are specifically about environmental integration and how the strategy is implemented i.e. not the same kind of indicators that ECE has in its strategic framework. It needs to be clarified what indicators exactly should be introduced, and reported upon.

In the draft strategy, a series of progress reports, and a sophisticated system of reports on key performance indicators, monitoring, evaluation, review etc. is proposed. The question arises who will do all this work. If not done by UNEP or EMG, such reporting could be a huge burden on the resources of the participating UN organizations, and it could lead to a duplication of or adding an additional layer to the current duties for monitoring, evaluation and reporting, and thus being in contrast to the aim of efficient use of scarce resources. It could increase the burden of reporting and leave less time to implementation for the benefit of member States, unless additional resources would be made available.

Our advice is to avoid new bureaucratic mechanisms, rely to the largest extent possible on existing reporting mechanisms within established environmental conventions and mechanisms, but make sure that UNEP gains the overview and information that is needed.

More detailed comments

On the proposed areas of enhanced collaborative partnerships for coordination (table): It needs to be better explained why “Energy” is listed as a thematic issue. Also, the thematic issue “Freshwater” could be renamed to “Water and Sanitation”. “Environmental rule of law” could be replaced by “Environmental governance”, and a theme “Transport and Environment” could be added.

To conclude, a system-wide approach, if light, would make sense. However, many details need to be elaborated in the draft strategy, such as the issue of resources, resource tracking, roles for participating organization, the roles of UNEP and EMG, and also the role of UN member States and at which point they will be able to contribute to the strategy, and when, through which bodies and with which purpose the member States are supposed to endorse it.

Summary

In sum, we will strongly and actively support the clear mandate given to UNEP to coordinate system-wide work on environment. This is a needed and positive step in the right direction.

However, it appears that more tasks would be created for all organizations participating in EMG, which would increase the overall workload and could be counter-productive to the initial purpose of the exercise. In that regard, approaches must be worked out and assessed based on the established reporting mechanisms within the existing environmental agreements and mechanisms at the regional and global level. The proposed construction of the strategy should become “lighter”, and strive to avoid additional reporting, monitoring and evaluation, while ensuring that UNEP is allowed to get the needed overview and information?