
**Second meeting of the Consultative Group
of Ministers or High-level Representatives
on International Environmental Governance**
Helsinki, 21-23 November 2010

Comments received from Governments on the papers:

- 1) “Elaboration of Ideas for Broader Reform of IEG”**
- 2) “Annotated table of broader IEG reform in a standardised format”**

Compilation by the UNEP Secretariat

Issued without formal editing.

Summary

Upon request by Governments, the Secretariat in the following compilation makes all comments received from Governments on the papers prepared for the second meeting of the Consultative Group on international environmental governance, available for general insight.

No.	Requesting government	Requested changes	Notes
1.	Australia	<p><u>General</u></p> <ul style="list-style-type: none"> • The relationship between the two documents is unclear. <ul style="list-style-type: none"> ○ Please advise of the status of these documents in relation to the upcoming Consultative Group meeting in Helsinki. ○ Please clarify the interrelationship between the documents. • Could the Secretariat provide logistical information on how the documents be discussed and decisions be made on options in the documents at the Helsinki meeting/further consultations? <p><u>Draft Elaboration of Ideas for Broader Reform of IEG</u></p> <ul style="list-style-type: none"> • Australia does not accept the statement on p3 that “Governments have agreed that the status quo of the IEG system is no longer an option” • It would be useful for assessment purposes if an analysis table in the same format as the ‘Annotated table’ in the other information note were included in this document. • Please clarify whether any of the options in this document require or relate to broader reforms. • How would these options fit with the ongoing process of strengthening UN system-wide coherence, i.e. the “Delivering as One” concept? How would they fit with other ongoing UN processes? • The draft document would be greatly enhanced by a financial cost-benefit analysis matrix across all proposed options in order to allow easier comparative evaluation. • The draft should clarify which MEAs are within its scope. Perhaps it would be useful to provide a table/list to indicate the coverage of the term ‘MEA’ in the document. • Some information could usefully be provided on the relationship between UNEP and UNESCO as envisaged within the different models. Particularly in relation to areas in which the two agencies would be conducting joint activities. • How do the options proposed relate to existing mechanisms and functions? Where there is duplication how would this be resolved? • Please advise how the further financial support required to implement these reforms would be levied? • Please provide detail on any impacts the proposed options would have on the legal sovereignty of MEAs? <p><u>Option a) 1</u></p> <ul style="list-style-type: none"> • Please provide greater analysis of the gaps this network would address. • How would this network work effectively in practice? • How does this proposal differ from the “UNEP-live” framework proposal? • How would this option improve on the performance of scientific and technical advisory bodies already associated with MEAs? It would be useful to include some information about existing networks under relevant MEAs. • How would the capacity building programme be implemented and how would it link to existing programmes, such as those run by the Global Environment Facility? 	

- What organisational structure and legal personality would the network require?
- How would a multi-scaled and multi-thematic global information network work in practice?
- Who would be responsible for administering this network?
- How would it be financed?
- How can the global community ensure that this option will successfully overcome existing gaps?
- Please provide further analysis on how the option will address and avoid existing problems of “being too top down, too sporadic and too disjointed to match the long-term efforts needed to sustain the evolution of national institutional infrastructures”?

Option b) 1

- How would this option impact the legal sovereignty of MEAs?
- What influence would the organisation have over MEAs and their funding and autonomy? Could it override them in these matters? How would this be effected?
- How would universal membership of the Governing Council increase UNEP’s ability to influence other agencies and MEAs?
- What gaps in UNEP’s mandate are not met by its current activities and functions?
- What are the core environmental principles that would be a critical part of the organisation? How would these principles be agreed upon?
- How can effective and efficient decision making be maintained/increased with universal membership?
- Is it proposed that this organisation supersede UNEP? If not, how would it interact with UNEP?
- What would be the proposed mandate, functions, organisation, and legal personality (including in relation to the MEAs and existing bodies in the UN system) of such an organisation?
- How is it proposed such an organisation be funded and governed?

Option c) 1

- Please provide analysis of how the effectiveness of MEA COPs would be impacted upon through shared resourcing.
- Is the purpose to gain efficiencies in costs, or to create synergies of policies and implementation?
- How will decisions be made about synergising COP processes?
- How would the clustering occur from a practical point of view?
- What is intended by the statement “a clear national benefit must be part of the outcome”?
- What comprise the subset of ‘biodiversity related MEAs’?
- How does this proposal relate to other non-UNEP MEAs, like those administered by UNESCO?
- Would the larger MEAs have more influence in decision-making and budget than smaller MEAs in clustered secretariats or would they all have equal status?

Option c) 2

- Who would give final approval for the system-wide strategy? Would it be UNGA?
- How could the strategy interact with MEAs? How could it affect their decision-making autonomy, work programs and budget?
- What value would this add to the system already in existence?
- Please detail further how the proposed option would actually achieve the range of benefits identified by

the paper , being:

- bringing more clarity to the current proliferation of forums where environment issues are discussed and/or coordinated at the interagency level;
 - setting basic guidelines for interagency cooperation on environmental issues; and
 - developing a division of labour that identifies and leverages the comparative advantages of different agencies and maximises the UN's impact within the context of the sustainable development agenda.
- Please provide further analysis of how this could promote and produce efficiency gains.

Option d) 1

- What incentives are there for private foundations and businesses to invest in public-private partnerships to address environmental issues (through the kinds of mechanisms represented by the health funds)? Are there examples of environmental funds with strong corporate or philanthropic support?
- How would it operate administratively?
- Under what parent body would the structure sit?
- How would the funding be distributed?
- What are the risks and benefits of widening the donor base, in terms of long-term funding availability, funding priorities and the creation or reform of institutional mechanisms?
- How would this interact/relate to MEA funding arrangements, e.g. would it complement or supersede existing MEA and other funding arrangements?

Option d) 2

- Where would such a body sit?
- How would it operate administratively?
- How would this mechanism interact with the existing financial mechanisms, e.g. the GEF and the Multilateral Fund for the Implementation of the Montreal Protocol?
- To what extent would this proposal make a difference in terms of administrative costs?
- What systems will be developed to ensure adequate multilateral funds delivery?
- How will this proposal achieve improved environmental outcomes through on-the-ground programming?
- Would this proposal entail a change to the constitution of the existing financial mechanisms?
- How would the funding be distributed?
- How would this interact/relate to MEA funding arrangements, e.g. would it complement or supersede existing MEA funding arrangements?
- How would this mechanism impact MEAs' abilities to leverage funding?
- How would this option impact the legal sovereignty of MEAs?

Option d) 3

- How would this option be operationalised?
- How would this option relate to the MEAs? What would be the impact on their funding flows?
- How would this option impact the legal sovereignty of MEAs?

- Where would responsibility for the distribution of funding lie?
- How would a new overarching coordination body differ from the role of the GEF?
- Could the GEF's coordination role be enhanced to achieve these objectives?
- There are various financing bodies (GEF, international financial institutions (IFIs)) such as the World Bank and regional development banks, etc), some within and some outside the UN system. How would these bodies cooperate and coordinate to link with a global environmental policy-making body and avoid duplication?
- Does this proposal seek to merely enhance links and collaboration between existing funding bodies or will it perform more of a coordination and oversight function?
- What would be the proposed mandate, functions, organisation, and legal personality of such a body?
- How will this proposal ensure it is effective and efficient when implemented? What auditing arrangements would be put in place to ensure this?
- Has a cost-benefit analysis been undertaken to support this proposal?

Option e) 1

- How would the proposed increase in UNEP's biannual budget to \$900 million be financed?
- If supported, would this be the most effective use of global resources?
- What measures could be put in place to ensure positive environmental outcomes?

Option e) 2

- How will this proposal improve on existing capacity building and technical assistance measures under MEAs?
- What intergovernmental body would oversee the overarching framework?
- What would be the functions, mandate, funding arrangements and organisational structure of the Secretariat?
- What would be the functions, mandate, funding arrangements and organisational structure of the intergovernmental body? What would be its relationship with pre-existing UN bodies?
- Who would form part of the multi-stakeholder partnership?
- How would the policy framework be identified?
- How would these bodies be established?
- How would this framework impact on MEA autonomy and legal sovereignty?
- How would this framework impact on current MEA funding arrangements?
- How would the overarching framework interact with MEAs? Would it impact their work programs?
- Why couldn't the role of the GEF/UNEP be enhanced and its operations improved to perform these functions?

Annotated Table of Broader IEG Reform

- In general much greater/more in-depth information/analysis of these proposals is required before an adequate assessment can be made of their relative merits.
- Please provide more detail on the impact of these options on the operation and sovereignty of existing MEAs.

- Please provide more detail on how the proposed bodies would interact with existing UN bodies.
- Please provide more detail on how the proposed bodies would interact with other existing bodies such as the International Whaling Commission.
- How would these options fit with the ongoing process of strengthening UN system-wide coherence, i.e. the “Delivering as One” concept? How would they fit with other ongoing UN processes?
- How would duplication be dealt with/avoided?
- Please explain the difference between broader reform options 2, 4 and 5.

- *Enhancing UNEP*
 - How would the GC/GMEF achieve universal membership?
 - How would the proposed budgetary increase to enhance UNEP’s operational capacity be financed?
 - Would the membership of the CPR remain the same?
 - This approach raises questions about the relationship between UNEP and UNESCO and the administration of conventions such as the World Heritage Convention which are not UNEP Conventions. Please clarify.
 - How will an enhanced UNEP prevent/decrease institutional fragmentation?

- *A new umbrella organisation for sustainable development*
 - What organisations would sit under the umbrella organisation? How would the hierarchy be structured?
 - How would an agreement be reached to draw funding from the existing organisations?
 - Would this organisation be in addition to UNEP or would it replace UNEP?
 - If in addition to UNEP, how would it be associated/relate to UNEP?
 - How would the organisation ensure the environment pillar is strengthened?
 - How would the organisation differ from the UNDP/relate to the UNDP?
 - How would the organisation impact the financial and human resource of MEAs?

- *Specialised agency, such as World Environment Organisation*
 - Would this organisation be in addition to UNEP or would it replace UNEP?
 - If in addition to UNEP, how would it be associated/relate to UNEP?
 - What procedure would give the agency’s General Council legal autonomy over MEAs?
 - How would membership be harmonised?
 - How would a WEO prevent/reduce duplication?

- *Possible reforms to ECOSOC and the Commission on Sustainable Development*
 - What organisations would be associated with the consortium? How would the hierarchy be structured?
 - How would an agreement be reached to draw funding from the existing organisations?
 - In addition to the suggestion of transforming CSD into a Consortium for Sustainable Development, two suggestions for reform have also been raised at CSD meetings: i) transforming CSD into a Council to replace the Trusteeship Council or ii) making CSD an organ of the General Assembly like the Human Rights Council. How does this proposal relate to/differ from these proposals for

		<p>CSD reform?</p> <ul style="list-style-type: none"> ○ Would these reforms be in addition to UNEP? If so, how would they relate to UNEP? ○ How would the organisation ensure the environment pillar is strengthened? ○ How would the reforms differ from the UNDP/relate to the UNDP? ○ Please provide more detail on the financing arrangements for this option? Would it pull funds from MEAs? <ul style="list-style-type: none"> ● <i>Enhanced institutional reforms and streamlining of present structures</i> <ul style="list-style-type: none"> ○ What organisations would be associated with the consortium? How would the hierarchy be structured? ○ How would an agreement be reached to draw funding from the existing organisations? ○ Would these reforms be in addition to UNEP? If so, how would they relate to UNEP? ○ How would the organisation ensure the environment pillar is strengthened? ○ How would the reforms differ from the UNDP/relate to the UNDP? ○ How would this framework impact the financial and human resource of MEAs? 	
2.	Canada	<p>The draft documentation received is very informative. We offer two suggestions for your consideration as you revise the document “Draft Elaboration of Ideas for Broader Reform of International Environmental Governance”: 1) further clarity and consistency on the information presented throughout the document - for example, the legal and financial implications for each of the reform options should be outlined more clearly to allow for an informed decision; 2) use a more neutral tone. You will find below, more detailed comments on the two papers.</p> <p>I) INFORMATION NOTE “DRAFT ELABORATION OF IDEAS FOR BROADER REFORM OF INTERNATIONAL ENVIRONMENTAL GOVERNANCE”</p> <p><u>Objective A) Creating a strong, credible and accessible science base and policy interface.</u></p> <p>Option: Create a multi-scaled and multi-thematic global information network of national, international and independent scientific expertise for keeping the impact of environmental change on human wellbeing under review and issue early warnings. The network would be facilitated by a web-based facility for sharing of “live” information with the support from an interagency cooperation arrangement.</p> <p><u>Comments:</u></p> <p><u>Section “Description of option”:</u></p> <ul style="list-style-type: none"> ☐ We suggest further elaboration of the concept of UNEP as overall coordinator of the vast network of information resulting from the intergovernmental and inter-agency research and scientific assessment work (e.g. how would this work?). ☐ First paragraph on page 9 (“Similarly, a coalition of institutions...”): It would be useful to mention at least one example of an existing interagency coordination mechanism being envisaged. 	

Section “Financial and legal implications”:

□ This section does not currently address the financial implications of the proposed option. We suggest it be added to be consistent with the title of the section.

□ The third paragraph (“Efforts to secure sufficient, predictable and coherent funding...”) should be further elaborated as it does not demonstrate how efforts to secure sufficient, predictable and coherent funding could be facilitated through the network.

□ Last paragraph on page 9: The proposal for a possible overarching framework for capacity building and technical assistance should be further developed. It is unclear how a multi-scaled network would contribute to strengthening the scientific capacities of developing countries. This appears to be mixing concepts; what is posited is the need for coherence and targeting of global science, which is distinct from creating capacity for science (and identification of national priorities) within developing countries.

Objective B) Developing a global authoritative and responsive voice for environmental sustainability

Option: Establish a global policy organization with universal membership to set, coordinate, and monitor the global environmental agenda.

Comments:

Section “Status”:

□ 5th paragraph on page 10 (“Reflecting on such changes, the Governing Council...”): In order to be more accurate, we would suggest that the last part of the second sentence quotes the exact text of the Nairobi Declaration as follows: “To that end, the Council decided to improve the governance structure of UNEP and, in that context, emphasized that the United Nations Environment Programme should serve as the world forum for the ministers and the highest-level government officials in charge of environmental matters in the policy and decision-making processes of the United Nations Environment Programme.”

□ Last paragraph on page 11 (“It must be recognized...”): We suggest the deletion of the whole section (from “It must be recognized...” until “...expected to adopt decisions.”) because it is too one-sided. If the concerns noted in the paper remain, then views supporting universal membership of UNEP GC should also be added. However, our preference would be to delete the text.

Section “Gaps”:

□ First paragraph on page 13 (“If UNEP is going to have the political weight...”): We would suggest using a more neutral tone and focus on factual information. For example, language contained in the last sentence (“how can UNEP have legitimacy with 58 members and make recommendations to bodies such as the COPs with three to four times as many?”) should be avoided. The numbers alone would not necessarily give UNEP guidance more legitimacy, but rather it is the quality of that guidance, its relevance to the issues being addressed in any particular forum (such as at a COP) and its perceived usefulness.

Section “Financial and legal implications:

□ We suggest adding information to clarify what would be required to make the membership of UNEP

Governing Council universal (e.g. UNGA resolution?) It would also be useful to include some kind of definition of “assessed contributions”.

Objective C) Achieving effectiveness, efficiency and coherence within the UN system

Option 1: Clustering secretariat functions and common services--establish a mechanism for global, overall coordination among existing MEAs, with one mechanism having innovative tasks that are not performed by MEA Secretariats individually, and without prejudice to their decisionmaking and budgetary independence. This would include joint MEA institutional structures, including: 1. Secretariats, 2. Legal, financial and conference services, 3. Reporting, 4. Scientific structures, 5. Programmatic structures 6. Knowledge management and IT.

Comments:

Section “Status”

First paragraph on p. 15 (“Intensive treaty negotiation...): We suggest inserting the word “sometimes” in front of “resulted” as coordination is not necessarily always inefficient.

Sub-paragraph (b) on p. 16 (“the secretariats of three global MEAs...): the Global Programme of Action should be removed as it is not a multilateral environmental agreement like the Rotterdam and Stockholm Conventions.

Section “Description of option”

Second paragraph on p. 18 (“Reducing the number of meetings...): With respect to the Chemicals and Waste ExCOP, these were not “back-to-back” meetings. It would be more accurate to refer to the “Simultaneous meetings of Conferences of the Parties to the Basel, Rotterdam and Stockholm Convention, which focused on synergies between the three conventions.”

Third paragraph on p. 18 (“Coordination of scientific information...): The paragraph should clarify whether the “hub” would replace existing scientific bodies, such as the Subsidiary Body on Scientific, Technical and Technological Advice to the CBD, or play a complementary role.

Fourth paragraph on p. 19 (“In this model, the Executive Director...): Point 3 (“avoid that current staff confines their interaction to their respective secretariats; and”) is not clear and more information on what this means/implies would be useful.

Option 2: Establish a UN system-wide medium-term strategy for the environment, coordinating all environmental activities of the UN.

Comments:

Section “Gaps” (p. 22)

The first paragraph states that there are “sometimes competing or incoherent decision-making structures” in international policy. It would be helpful to illustrate this statement with specific examples.

Objective D) Securing sufficient, predictable and coherent funding.

Option 1: Widen and deepen the funding base.

Comments:

Section “Description of option”

- First paragraph after Table 1 on p. 26 (“A successful model of innovative financing...”): While we believe it is good to mention the GAVI example, it would be useful to provide a few examples of environmental initiatives such as CDM, Payment for Ecosystem Services schemes, etc.

Option 2: Establish a joint management mechanism for all major trust funds for the environment with equal roles for project selection, appraisal and supervision of environment-related activities, in accordance with the respective spheres of expertise.

Comments:

Section “Gaps” (p. 28):

- The last sentence of the first paragraph refers to the relatively small resources UNEP receives under the GEF compared to other implementing agencies (“This relates in particular to UNEP, which as the global authority...”). The discussion of international environmental governance is broader than UNEP. This section of the paper is supposed to be about why funding for global environmental issues should be more centralized. We therefore suggest deleting the last sentence of this paragraph to achieve a more neutral tone.

Option 3: Link global environmental policy making with global environmental financing.

Comments:

Section “Description of option” (p. 32):

- The second paragraph under this section (“The fragmented financing system...”) states that there is no legal recognition the UNEP Governing Council should play a role in guiding the GEF environmental priorities and overall direction. Clarification is needed on what “legal recognition” means.
- The last sentence of second paragraph refers to “the GEF’s authority based on financial power”. This statement should be clarified and the GEF mandate should be mentioned.

II) ANNOTATED TABLE OF BROADER IEG REFORM IN A STANDARDISED FORMAT

Option: Enhancing UNEP

- Mandate, Legal personality:** The column should specify whether a UN General Assembly resolution would be required (we suspect it would, at least for the issue of universal membership of the Governing Council). Mention should also be made as to what would be the level of approval needed for the

		<p>GC/GMEF to fulfil the role of the GEF Assembly in providing strategic and overarching guidance to the GEF Council.</p> <p><input type="checkbox"/> Funding arrangements/financial implications: The column mentions that increased funding for an enhanced UNEP could be achieved through a combination of assessed contributions and voluntary and non-core funding from donors. A clear indication of what is intended by “assessed contributions” should be included (e.g. does it mean an increase in the funds coming from the UN budget?).</p> <p>Option: Specialised agency, such as World Environment Organisation</p> <p><input type="checkbox"/> Mandate, Legal personality: Mention should be made of the fact that a WEO would be established by an intergovernmental legally-binding agreement.</p> <p><input type="checkbox"/> Funding arrangements/financial implications: It is suggested that activities could be funded through a trust fund such as the Global Fund, or the WTO technical assistance fund. Further details on this would be useful.</p>	
3.	Germany	<p><u>General comments</u></p> <p>We welcome that the paper presented by the co-Chairs of the Consultative Group provides more detail on the remaining nine options and puts more focus on the gaps of the current IEG system as requested by the Consultative Group in Nairobi. Germany further welcomes that the paper concentrates on the reform of the IEG while putting it into the wider context of the sustainability governance (ISDG).</p> <p><u>Option B 1. Establish a global policy organization with universal membership to set, coordinate and monitor the global environmental agenda</u></p> <p>The paragraph provides a useful explanation of the status of UNEP and the reasons why it is not able to fully fulfil its mandate. We are rather surprised that the description of the options is limited to upgrading UNEP and to universal membership to UNEP. During the Belgrade Process and also in Nairobi there were more options under consideration. For instance, Germany and the EU are striving to establish a UN specialised agency (UNEO) based in Nairobi. We are requesting the inclusion of this option as well as of the other options for broader reform so that they can be properly discussed in Helsinki.</p> <p><u>Option C 1. Achieving effectiveness, efficiency and coherence within the United Nations System – Clustering secretariats functions and common services</u></p> <p>We support the objective of clustering functions of MEAs and thus enhancing collaboration among them as far as this leads to more efficiency and effectiveness in the IEG system.</p> <p>Stronger environmental policy guidance also needs to provide strategic guidance to the existing funding mechanisms for the environment including the GEF. The Assembly of a future specialised agency for the environment should continue to fulfill UNEP's existing mandate to provide policy guidance and should cooperate in this respect with the COPs of the Conventions which are the competent bodies for the financial mechanisms of the Conventions. All Parties to the Conventions should support efforts to streamline guidance to</p>	

		<p>the GEF and make it more coherent. Convention Secretariats may provide useful information for this process.</p> <p><u>Option D 2. Establish a joint management mechanism for all major trust funds</u></p> <p>There are several options on how to achieve an efficient dovetailing of the most important international financial mechanisms for the environment. The reform options should respect the Paris-/Accra principles. Regarding the proposed new financial tracking system, it should be highlighted that both the national reports to the Environmental Conventions and the OECD-DAC reporting system (Rio markers and Creditor Reporting System) provide comprehensive data in this respect.</p> <p><u>Option D 3. Link global environmental policymaking with global environmental financing</u></p> <p>As mentioned above, stronger environmental policy guidance needs to provide more strategic guidance also to the existing funding mechanisms for the environment including the GEF. We support a better realignment of the multilateral policy making and the international funding mechanisms.</p> <p><u>Option E.1. Establish environment-development country teams and or/desks in existing intergovernmental offices in developing countries</u></p> <p>We support the use of existing structures and a stronger participation of UNEP in UN country offices according to “Delivering as One” and “System Wide Coherence” efforts. A fragmentation through setting up separate UNEP country offices should be avoided, whereas a strengthening of UNEP regional offices might be necessary to back up demand voiced at national level. The experience of the “Delivering as One” pilot countries should be used to further extend coherent UN support to other countries and enhance UNEPs involvement and cooperation with other agencies in-country.</p>	
4.	Japan	<p>1. General Comments</p> <ul style="list-style-type: none"> ➤ The additional information in the documents, such as the detailed description of the options, the financial and legal implications, and the status and gaps are useful for our consideration of the options. It could also be useful to indicate the linkages between the functional options and the institutional reform options in the table of broader IEG reform. ➤ Many efforts are being made to enhance International Environmental Governance and the discussions for incremental reforms are ongoing at the CPR. We think it is necessary to consider the options for broader reform based on these ongoing efforts. <p>2. Specific Comments</p> <p>(1)Draft Elaboration of Ideas for Broader Reform of International Environmental Governance</p> <p><u>A) Creating a strong, credible and accessible science base and policy interface</u></p> <ul style="list-style-type: none"> · <i>Create a multi-scaled and multi-thematic global information network of national, international and</i> 	

independent scientific expertise for keeping the impact of environmental change on human wellbeing under review and issue early warnings. The network would be facilitated by a web-based facility for sharing of "live" information with the support from an interagency cooperation arrangement.

- We think it would be effective to consider this option based on the GEO process in UNEP. We would appreciate more information about what has been achieved and what are the difficulties under the GEO process in the context of this option. It could be helpful if there were more information on the legal and financial implications in developing GEO5 to meet the objective of this option.

B) Developing a global authoritative and responsive voice for environmental sustainability

· Establish a global policy organization with universal membership to set, coordinate, and monitor the global environmental agenda.

- Most of the subsidiary bodies that have been set up under the UNGA have representative membership. We are concerned that UNEP with universal membership could lead to inefficient operation of UNEP and complicate the process of consolidating various opinions among member states. We think it is necessary to take into consideration the effectiveness and efficiency of operation and decision making in the subsidiary bodies of UNGA that have universal membership.

C) Achieving effectiveness, efficiency and coherence within the United Nations system

· Clustering secretariat functions and common services- establish a mechanism for global, overall coordination among existing MEAs, with one mechanism having innovative tasks that are not performed by MEA Secretariats individually, and without prejudice to their decision-making and budgetary independence. This would include joint MEA institutional structures, including: 1. Secretariats, 2. Legal, financial and conference services, 3. Reporting, 4. Scientific structures, 5. Programmatic structures, 6. Knowledge management and IT.

- We believe it is worth considering how we can cluster the secretariat functions and common services without affecting the decision making and budgetary independence of the MEAs, in terms that it could reduce the running costs for MEA secretariats and the burden for MEA parties. We would appreciate more information regarding the description about creating a mechanism for providing common services for clustered Conventions in UNEP and the relationships between UNEP and the MEA secretariats under this mechanism, taking into account that the arrangements for joint services and functions could differ in each cluster. Moreover, it is difficult to understand the value of a global mechanism for overall coordination when it is unclear how the clustering of secretariat functions will be formed.

D) Securing sufficient, predictable and coherent funding

· Establish a joint management mechanism for all major trust funds for the environment with equal roles for project selection, appraisal and supervision of environment-related activities, in accordance with the respective spheres of expertise

➤ We have some doubts about the feasibility and efficiency of designating a central management authority or creating common criteria and application procedures, regarding that all major trust funds have specific procedures for project selection, appraisal and supervision. However, setting up a financial tracking system to integrate the information of projects implemented under major trust funds could be an option worth considering, for the effective and efficient use of funds. It could be helpful if there were more information on the financial and legal implications of UNEP setting up a financial tracking system.

· *Link global environmental policy making with global environmental financing*

➤ It could be effective for GC/GMEF to provide policy guidance to GEF, in the context of linking global environmental policy making with environmental financing. However, GEF is an independent finance mechanism and we have some doubts about the feasibility of abolishing the GEF Assembly, which is the governing body for GEF, and the GC/GMEF taking up its function.

E) Ensuring a responsive and cohesive approach to meeting country needs

· *Establish environment-development country teams and/or desks in existing intergovernmental offices in developing countries around the world.*

➤ We think it is effective and efficient to further enhance UNEP's cooperation with UNDP and the UN system through the One UN Programme and UNDAF processes. The existing intergovernmental offices, such as the UNEP regional offices and UNDP country offices, should be utilized as much as possible. We do not see the necessity for establishing a new institutional structure similar to that of the FAO with regional, sub-regional and country offices. It is important for UNEP to implement activities at the national level in areas where it has comparative advantage under its current mandate. UNEP's mandate should not be changed to include operational activities.

· *Develop an overarching framework for capacity building and technical assistance for the operational activities of MEAs, UN agencies and IFIs.*

➤ We think there will be difficulties in deciding on priority areas and advising on the allocation of resources under an overarching framework with a broad range of activities and various relevant organizations. Moreover, the linkage between the overarching framework and the Bali Strategic Plan is unclear. We think it would be helpful if there were more information about the reasons for the overarching framework and the differences from the Bali Strategic Plan. The UN resolution 64/204 invites the relevant United Nations funds and programmes and the specialized agencies and MEAs to consider mainstreaming the Bali Strategic Plan in their overall activities. We think it is important to support and review the activities in the UN system in line with the Bali Strategic Plan based on this UN resolution.

(2)Annotated table of broader IEG reform in a standardized format

		<p>· <i>Enhancing UNEP</i></p> <ul style="list-style-type: none"> ➤ We are concerned that UNEP with universal membership could lead to inefficient operation of UNEP and complicate the process of consolidating various opinions among member states. We think this option should be considered carefully and it is not appropriate to refer to it in this table. ➤ GEF is an independent finance mechanism and we have some doubts about the feasibility of abolishing the GEF assembly and the GC/GMEF taking up its function. ➤ The description of 'Funding arrangements/financial implications' refers to assessed contributions. We think this is not appropriate as an option for enhancing UNEP since this would change the nature of UNEP which is to be funded from voluntary contributions from Member states from its establishment. 	
5.	Mexico	<p><u>General Comments:</u></p> <ul style="list-style-type: none"> • The document reflects the endeavors that the Member States and the United Nations Environmental Program (UNEP) have carried out to identify a better understanding about the ways to achieve a substantive reform of the international environmental governance. • In this context, the document presented by the Executive Director containing the nine indicative options that were considered during the First Meeting of the Consultative Group in July 2010, notably contributes to this proposal. • In general, these efforts should be addressed to strengthen and improve existing mechanisms and to consider the establishment of new mechanisms, only in cases where it may be extremely necessary and once the corresponding cost-benefit analysis is carried out. <p><u>Specific Comments:</u></p> <p>Objective a) Creating a strong, credible and accessible science base and policy interface.</p> <p>1. Create a multi-scaled and multi-thematic global information network of national, international and independent scientific expertise for keeping the impact of environmental change on human well-being under review and issue early warnings. The network would be facilitated by a web based facility for sharing of -live information with the support from an interagency cooperation arrangement.</p> <p>Mexico agrees on the importance of defining an institutional framework of a global information network, as well as its links with existing processes and proposals at the local, regional and international levels (for example GEO or IPBES).</p> <p>Objective b) Developing a global authoritative and responsive voice for environmental sustainability</p> <p>1. Establish a global policy organization with universal membership to set, coordinate, and monitor the global environmental agenda.</p> <p>Taking into account that the role of the United Nations Environment Programme is to be the leading global</p>	

environmental authority that sets the global environmental agenda, that promotes the coherent implementation of the environmental dimension of sustainable development within the United Nations system and that serves as an authoritative advocate for the global environment; Mexico considers that the current challenges posed to the international community require the involvement of all the countries in the debates and decision-making processes within this program, thereby legitimizing the strategies and actions that ought to be instrumented to confront these challenges.

Although the document suggests that the financial and legal implications for implementing this option are minimal, Mexico considers it pertinent to include more precise information in order to evaluate:

- The structure of the proposed organization;
- The mechanisms and criteria for determining the scale of assessment of the States in light of the implied increase resources that it will entail.
- To determine how the proposed organization would be linked with the existing Multilateral Environmental Agreements.

Objective c) Achieving effectiveness, efficiency and coherence within the United Nation's system

1. Clustering secretariat functions and common service-establish a mechanism for global, overall coordination among existing MEAs, with one mechanism having innovative tasks that are not performed by MEAs Secretariats individually, and without prejudice to their decision making and budgetary independence. This would include joint MEA institutional structures, including: 1. Secretariats, 2. Legal, financial and conference services, 3. Reporting, 4. Scientific structures, 5. Programmatic structures 6. Knowledge management and IT

2. Establishing a UN system-wide medium-term strategy for the environment, coordinating all environmental activities for the UN.

Mexico considers that this strategy would facilitate the creation of synergy between the different environmental programmes and bodies within the UN. With this goal, it would be indispensable to include a well defined framework on the competences that UNEP, Environment Management Group (EMG), Chiefs Executive Board (CEB) and United Nations Development Group (UNDG) would have on the process.

On this matter, Mexico considers it timely to follow-up the current process of fusion between the Executive Secretariats of the Chemicals Conventions.

Objective d) Securing sufficient, predictable and coherent funding

1. Widen the donor base, e.g. establish mechanism for receipt of private/philanthropic donations.

2. Establish a joint management mechanism for all major trust funds for the environment with equal roles for project selection, appraisal and supervision of environment-related activities, in accordance with the respective spheres of expertise.

		<p>It is important to find alternative ways to rationalize and improve existing financial mechanisms and the management of resources. In this context, Mexico considers it necessary to take into account the central role of the GEF in the efforts to achieve this objective, as well as the importance of strengthening and increasing the basis for fund-raising to face future challenges in an effective manner. This option could be evaluated in combination with options 1 and 3 of this objective.</p> <p>Any financial scheme or mechanism should ensure a decision making process based on the principle of equality among States.</p> <p>3. Link global environmental policy making with global environmental financing.</p> <p>Objective e) Ensuring a responsive and cohesive approach to meeting country needs</p> <p>1. Establish environment-development country teams and/or desk in existing intergovernmental offices in developing countries around the world.</p> <p>It is necessary to consider the fundamental role that the regional offices of UNEP play in supporting the developing countries. Therefore, measures should be put in place to strengthen these offices. In this respect, it is important to clarify the role of any “strategic regional office” in addition to the existing regional offices. This would imply assigning important resources of UNEP’s biannual budget to an initiative that in principle would not add value.</p> <p>2. Develop an overarching framework for capacity building and technical assistance for the operational activities of MEAs, UN agencies and IFIs.</p> <p>Bali Strategic Plan for Technology Support and Capacity-Building represents the cornerstone of the efforts on this matter. It would be important to have access to information on the proposal to establish a Secretariat that facilitates the implementation of the objectives of an eventual new framework for technology support and capacity building, as well as on its structure.</p>	
6.	Norway	<p>Ad " Draft Elaboration of Ideas for broader Reform of International Environmental Governance" (Doc 1)</p> <p><u>General comments:</u></p> <ul style="list-style-type: none"> • There is too little analysis of the <i>pros and cons</i> of each option, or of different modalities. • The “description of option” segments generally present <i>one</i> interpretation, rather than discussing various scenarios or ways to operationalize them. The descriptions presented do not necessarily reflect the discussions in the Consultative Group. • The options are generally presented primarily from a UNEP perspective, including those options that will clearly affect other UN entities, without presenting their views or experiences. This may give the impression of “UNEP making the case for an expanded UNEP”. • There are in general too many undocumented statements (e.g. “this option <i>would</i> lead to”) 	

More specific comments on each option:

Re A. "Creating a strong, credible and accessible science base and policy interface":

- As noted by several delegates in Nairobi, this is an area where key structures and processes already exist (e.g. IPCC, GEO5) and where important progress has been made lately (e.g. towards establishing IPBES). We hence miss an analysis of how far we can reach towards the defined objectives by building on these structures/processes, including functions that may be taken care of by a future IPBES. Any discussion of the possible need for a new "multi-scaled global network" should be based on such an analysis.

Re B. "Establish a global organization with universal membership to set, coordinate and monitor the global environmental agenda":

- See general comments above.
- The paper would have benefitted from being more analytical and bringing in different perspectives. It argues in favour of a UNEP with universal membership, without analyzing *why* this has not happened until now.
- The paper argues that UNEP requires more weight within the UN system, i.a. in order to make recommendations to and review the activities of other agencies. We would have liked to see this statement accompanied by a review of how this is seen by other agencies.
- Under "financial and legal implications" the paper indicates that " the CPR could act as the executive body .." (p.14), without any reference to the fact that this would actually require two major reforms – agreement on the establishment of an executive body and on a revised mandate for CPR .

Re C: "Achieving effectiveness, efficiency and coherence within the United Nations":

C1. "Clustering...":

- This chapter would have benefited by a review of what kind of decision making processes in what fora such an option would require, in order to give member states a realistic understanding of the amount of time and resources that would have to be invested in order to implement it.

C2. "Establish a UN system wide strategy..."

- See general comments above.
- This chapter discusses this option as if it were identical with recommendation 3 of the JIU report. However, the option on the table has no reference to UNEP's MTS being adopted as the UN system-wide

strategy. During the Nairobi meeting (and in the Belgrade process), the proposal was rather made that the CEB should be requested to take on the responsibility for developing such a strategy, in order to ensure a system-wide ownership. This way of doing it would take into account the comments made by CEB to the JIU recommendation. We would like the revised paper to elaborate on options for how such an inclusive process could be designed.

Re D: "Securing sufficient, predictable and coherent funding":

- See general comments above, in particular on the need for more analysis and inter-agency involvement. This chapter would benefit from incorporating experiences of funds and agencies more experienced with managing large financial flows.
- Some of the options presented would require very complex and cumbersome processes, a complexity that could well be better reflected in the paper. A joint management mechanism for all major trust funds for the environment would be quite a different exercise than the chemicals and wastes synergies process referred to as a proxy (p.30). And also rather different from GAVI, with its specific focus on vaccines and immunisation.
- When using examples like GAVI or GFATM from the health sector as models, one should also analyze the implications of new vertical structures like these for an already fragmented system.
- It would be useful if the paper could single out some options that are less complex and/or controversial and elaborate more on them. This could i.a. include the option of setting up a financial tracking system, which might be a useful complement to a UN system wide strategy (ref C2 above).
- The rather radical proposal of abolishing the GEF Assembly and let the GC/GMEF take over its function is presented as having many "pros", but hardly any "cons". How would such a reform be perceived by other stakeholders than UNEP, e.g. the World Bank or UNDP?

Re E: "Ensuring a responsive and cohesive approach to meeting country needs"

- See general comments above. We would have expected this chapter to start with an analysis of what countries need from the system and the major shortcomings in today's delivery. This should be followed by a discussion of how the UN system can better respond to these needs – in a cohesive manner.
- There is a section (under E1) describing UNEP's involvement with collaborative mechanisms like UNDAF, PEI and Delivering as One, but this is not followed by an analysis of how these mechanisms can be streamlined or used more effectively in order for the system to better respond to country needs. The draft paper seems to take for granted that it is mainly up to UNEP to fill the gaps in how the system today responds, thereby moving swiftly to describing a need for establishing UNEP country offices. The fact that such an option will require a doubling of UNEP's budgetary resources is put forward without any discussion of alternative uses of these resources. We need a much broader analysis of alternative options in this chapter, and we need the benefit of inputs from other UN agencies, not least UNDP.

		<p>Ad “Annotated table of broader IEG reform in a standardized format” (Doc 2)</p> <p>Our understanding at the Nairobi meeting was that this format was presented as a means to give a standardized presentation of the various options under discussion. Instead, the table has now been filled with proposals that have <i>neither been tabled nor discussed</i> in the consultative group. The two documents are hence not discussing the same options. The table also describes forms only, without relating these to the functions they are to perform, and are as such not in line with the “form follows function” approach.</p> <p>We fear that this approach will be more confusing than helpful for the group’s work, and would propose that the table be withdrawn in its present form.</p>	
7.	Sweden	<p>Sweden welcomes the paper drafted by the co-chairs with the assistance of UNEP. It gives an informative and concrete basis for the discussions in Helsinki. The paper could be further improved by being streamlined and some of the proposals could be elaborated and motivated further. In a few cases we would prefer a more nuanced, broader approach with solutions proposed that take into account the potential and comparative advantages of not only UNEP, but also the rest of the entities of the UN system. We thus believe it is crucial to bring in the views and perspectives of other actors in the international environmental effort within the UN system and beyond - including the Conventions, the GEF, the OECD and the World Bank.</p> <p>As the broader reform of IEG is an issue where there are strongly diverging views among member states, it is crucial that the options tabled for discussion in Helsinki really capture those aspects where there is greatest potential for a convergence of views. Another overarching comment is that the solutions proposed should also be as cost-efficient as possible, and always build on existing structures where possible. Please see below for more detailed comments.</p> <p>A) Creating a strong, credible and accessible science base and policy interface</p> <p>The idea of a network is interesting as long as it is based on already existing regional networks. But, we see a need to further clarify which concrete result that would be achieved with this quite ambitious proposal in relation to the gaps identified. In our view, lack of capacity, rather than lack of information is the most urgent gap. A competence exchange function could be linked to this option where countries with high capacity and good environmental statistics could assist countries with lower capacity.</p> <p>Further clarification is needed on the governance of the network. For instance, which would the several layers of governance be? We are not convinced that several layers are necessary and it could be difficult for governments to be represented by other countries in the global network.</p> <p>We are positive towards the proposal of a web based platform, as long as it is does not entail new reporting but is based on already existing data. We note that the platform is already included in the draft PoW for 2012-2013 (sp Governance). There is little mention of indicators in the proposal. A global database with capacity to sort</p>	

environmental data by DPSIR-indicators (a framework already adopted by the EEA) would have a lot of merit as these often can be very policy relevant. UN Data should be included as an important component – UN Data could more or less address all the challenges referred to. There is no mentioning of the experiences from Infoterra – how come?

The section on Financial and Legal Implications should address financial consequences of the proposal, which it does not in the current draft. We also think it would not be an appropriate task for the experts in the network to facilitate efforts to secure funding – this is a task for policy makers, even though a network of course could assist with economic evaluation of the cost-effectiveness of different measures etc.

B) Developing a global authoritative and responsive voice for environmental sustainability

Sweden welcomes the strong emphasis on universal membership, which could be a low-hanging fruit in comparison with several of the other options. It is very good that universal membership is "de-dramatized" considering that it would not entail less influence for member states nor higher cost. It is, however, only one aspect and we would like to inclusion of other measures to establish a global policy organization. One such measure would be introduction of assessed contributions and ultimately an upgrading of UNEP so it could operate on operating on an equal footing with other UN specialised agencies.

C) Achieving effectiveness, efficiency and coherence within the United Nations system

Option C. 1

We share the analysis of the current situation but arrive at a somewhat different conclusion as regards desirable solution. Sweden sees a great potential for synergies through a clustered approach, with increasingly closer cooperation. We are not convinced that a Joint Executive Management Team under UNEP's ED is the best solution, i.a. because UNEP does not host all the secretariats.

There is a lot of focus on the administrative functions which might not be where the greatest potential for synergies are as regards for instance biodiversity (cf. outcome of Helsinki seminar in April). We need to look at each cluster in itself and analyse/identify the greatest needs and potential for synergistic cooperation. The importance of a needs-based, bottom-up approach needs to be emphasized in the text, and reflected in the solution proposed.

Option C. 2.

Sweden thinks it is important that a system-wide strategy is not developed by UNEP's (or any other agency). We would like this option to respond to recommendation 2 in the JIU-report rather than (recommendation 3):

"The General Assembly should consider adding a system-wide policy orientation for environmental protection and sustainable development of the United Nations system in the United Nations Strategic Framework for the biennium programme plan; and in the event of this decision, should request the Secretary-General to prepare such a system-wide orientation for its approval through the Chief Executives Board."

We especially welcome the wordings in the information note on that a strategy should encompass division of labour and comparative advantages of different agencies.

D) Securing sufficient, predictable and coherent funding

Option D. 1.

We see a lot of merit in this option but are not convinced that it is really a "broader reform", or that it actually is an institutional issue. It is not described in the text how the "concerted institutional push" mentioned under Financial and Legal Implications would be undertaken.

As regards the GAVI-example we think it is interesting as an important added value of IFFIm's is that it affords GAVI a certain level of predictability. But the mechanism is wholly dependent on market trust. One of the factors that contribute to market trust is simplicity. The vaccination business is in its essence relatively simple with established models and existing country programs as well as clear lines of site between investment and results. We are not sure that the same can be said of the environment business. Is it possible to sell a environmental mechanism to the markets or is the business still too complex with too many unknowns?

It is also important to remember that IFFIm is not a source of endless amounts of free money. By front-loading IFFIm has boosted GAVI's total funding to levels that might be difficult to sustain. As the front-loading effect tapers off other funding must come in to take its place or funding levels will decrease. This is a situation GAVI is facing right now. To justify front-loading the investment case for reducing future costs should be strong.

Option D. 2.

Sweden thinks that the proposal of a Financial Tracking System (1) is interesting and we see merit in elaborating on the proposal, especially it's financial implications. We need to look into which institution that would be most suitable to keep track of the contributions, based on the systems already in place today. OECD could, for instance, be one candidate as they already follow-up some financial flows in this field.

We see some difficulties with the proposal on a joint management mechanism for all major trust funds for the environment (2). In our view this is to start in the wrong end. As long as there is not agreement on one joint environmental agenda (incl. governance of it), the decisions on management and distributions of funds cannot be taken by an authority above the heads of the donors to the respective funds.

It is not clear how a joint mechanism could be established without creating a new structure – and more duplication of work -, even if it would make use of "the extensive expertise of existing funding agencies".

The section on Financial and Legal Implications needs to be developed. The comparison with the costs of the chemicals and waste synergies-process does not feel relevant when we discuss an integration of all environmental finance in the UN system as well as the GEF and WB.

Option D. 3.

The link between environmental policy making with finance could certainly be improved, but we do not share

the conclusion that “Ministers of environment are removed from the decision-making of the most important environmental funds”. It is up to every government to decide which ministry shall be responsible for the GEF. If a government has decided it should be the Ministry of Finance or the MFA, it is up to them and not for the GC, UNGA or any “global authority” to decide. It is in addition the *governments* of member states that are represented at international meetings, not individual ministries. For the same reason, the proposal to abolish the GEF Assembly is not reasonable.

As regards both D.2. and D.3, what we would emphasize is the importance of stronger national ownership, rather than centralization of decisions on policy priorities. There are interesting openings in the reform decisions of GEF 5 to enhance national ownership and link GEF-planning is more closely to the national development plans in a broad consultative process (with additional participants). As there will be emerging demand for policy advice at the country level, it would be logical for the UNEP to take on a more formal role as normative policy advisor in the national context, while respecting the principles of the One UN.

E) Ensuring a responsive and cohesive approach to meeting country needs

Option E. 1.

The need for capacity building is immense and there is great room for improvement of the current workings. There are many national processes (NBSAP, NAPAs, PRS, MDGRs etc.) that could be used as vehicles for mainstreaming of environment in (national) development – any initiatives should build on, develop and streamline these and other existing processes.

We think it is unfortunate that the proposal is UNEP-biased. For example, it is stated what UNEP has accomplished at the country level but nothing on what UNEP’s PEI-partner UNDP, or others, have achieved. Departing from the already existing structures and models, for ex. “One UN” and the PEI, would give us a both more cost-efficient and relevant proposal. Giving UNEP a mandate to have operative activities as the country level could add to the fragmentation at the country level rather than address it, and result in environmental issues being handled separately from development issues. In addition, we see a risk of duplication and overlap with the mandate that UNDP has as regards environment - there are already structures for operative environmental activities at the country level. Another aspect is that we if we want to get backing for any broader reforms, we have to be realistic. Considering that an implementation of the proposal would necessitate a doubling of UNEP’s budget, it is not realistic.

The objective as we see it is to achieve better *integration* of environment into development. Thus we would recommend a proposal more in line with the heading: “Establish environment-development country teams and/or desks in existing intergovernmental offices in developing countries”. Considering the cost-aspect, and the objective of integration, we favour most strongly elaboration of the idea of environmental desks in existing offices. Another cost-effective alternative that we see merit in is temporary secondment of UNEP staff to UN country teams.

Option E. 2.

We support the principle of a UN-wide plan for capacity building for environment as it would mean broader ownership for the issue. It would preferably be adopted by CEB and be a strategy that would guide all UN

		<p>agencies in their work with capacity building. We do not, however, see the necessity of creating yet another bureaucracy being set up to implement the strategy. It's implementation would ideally be the responsibility of all the concerned agencies, and ideally be followed-up in the UNDG.</p>	
8.	Switzerland	<p>1) Annotated table of broader IEG reform in a standardised format</p> <p>We generally welcome the work undertaken with regard to analyzing the five broader reform options that were identified at the second meeting of the Consultative Group of Ministers or High-level Representatives on International Environmental Governance in Rome 2009. This kind of systematic and comparative analysis is needed in order to bring the work of the consultative group forward.</p> <p>However, we are of the opinion that the analysis must be deepened considerably. In order to provide a solid basis for the discussions in Helsinki, more is needed than a table containing a “rudimentary description” of the broader reform options. In our view, the table was first and foremost intended as a tool for identifying the criteria for the further analysis, but the analysis does not necessarily have to be presented in this format. It might be more appropriate to present the analysis in a format comparable to the other draft background document, fully taking into account the criteria contained in the table.</p> <p>In a first step, the proposed five broader reform options need to be further elaborated. So far, it is not clear what each of these broader reform options means in practical terms. For all of the proposed options, there is not only one way of implementing them. In that sense, several sub-options exist. The analysis needs to spell out these different sub-options. In a second step, each of these sub-options should be analyzed separately in view of the identified criteria.</p> <p><i>For the option “Enhancing UNEP”, we see for example the following two sub-options: (1) an enhanced UNEP without (increased) operational capacity, and (2) an enhanced UNEP with further increased operational capacities.</i></p> <p><i>These two sub-options are both ways to “enhance UNEP” yet they differ fundamentally. Therefore, they should be analysed separately. They have different financial implications, as you have already described in the table. The first option has “very few financial implications and can be strengthened through institutional realignments”. The second option “would require a significant increase of financing”. The two sub-options would also have different implications for the mandate, the added value compared to the current IEG system etc. The implications need to be identified and elaborated in a thorough analytical report. The same is the case for the other four options for broader reform. The analysis should also clearly distinguish between different sub-options.</i></p> <p>The analysis should also make a clear distinction between changes that are absolutely necessary in order to put a specific option or sub-option into practice and further changes that would be helpful or interesting to be undertaken within this specific option or sub-option.</p> <p><i>For example, enhancing the mandate of UNEP by giving the GC/GMEF the role and mandate of the GEF Assembly is a new reform idea and there is no emerging consensus on it. Contrariwise, the change of universal membership is probably necessary for implementing an enhanced UNEP. Therefore, these two changes should</i></p>	

		<p><i>not be referred to in the same manner. Also the proposals to create permanent committees (science and policy interface, review body) are not indispensable elements of reform for enhancing UNEP. They should be presented in a manner that clearly distinguishes them from the indispensable elements.</i></p> <p>2) Draft Elaboration of Ideas for Broader Reform of International Environmental Governance</p> <p>The extensive elaboration of ideas generally meets our expectations in the sense that the analysis of each of the new ideas for broader reforms is certainly helpful and provides a good basis for the discussions on IEG in Helsinki. We look forward to the debates where we will provide our view on the content of the different ideas.</p> <p>3) Link between the five broader IEG reforms and the nine new ideas for broader reform</p> <p>The draft background documentation still does not make clear what the connection is between the ideas for a broader reform of IEG and the five reform options identified at the Rome meeting. In one way or the other it should be explained how the two papers relate to each other, for example whether the ideas are part of the five options and how they can contribute to the implementation of the options.</p>	
9.	Turkey	<p>"We believe that restructuring UNEP with the implementation of the given nine options will be very effective. However, the gaps of these options should be known very well and the strong points of these options should be brought forward. All of these options should be implemented after making a prioritization between the options.</p> <p>We also believe that coordination with the studies carried out by the European Union would be beneficial. These studies should be taken into consideration while determining the environmental policies."</p>	
10.	USA	<p>Comments on: Annotated table of broader IEG reform in a standardized format</p> <p>The United States believes that the options listed in this table require extensive further discussion before governments could truly consider these as options and any recommendations could be made. We have not yet had intergovernmental discussions on several of these options, and, based on earlier IEG meetings, there is clearly no consensus on several others. Some interesting concepts are listed, but a number of details are still lacking from most proposals. We must also reiterate that we are not supportive of the creation of any new institutions.</p> <p>Comments on: Draft Elaboration of Ideas for Broader Reform of International Environmental Governance</p> <p>A. Creating a strong, credible and accessible science base and policy interface.</p> <p><i>Create a multi-scaled and multi-thematic global information network of national, international and independent scientific expertise for keeping the impact of environmental change on human wellbeing under review and issue early warnings. The network would be facilitated by a web-based facility for sharing of "live" information with the support from an interagency cooperation arrangement.</i></p> <p>We believe this option encompassed efforts already agreed to be undertaken – UNEP "live" agreed at</p>	

GC25 – which we strongly support. From that perspective, we are very supportive of the concept. We do not support an additional, duplicative mechanism.

B. Developing a global authoritative and responsive voice for environmental sustainability.

Establish a global policy organization with universal membership to set, coordinate, and monitor the global environmental agenda.

The United States does not support the creation of a new global policy organization, or the evolution of UNEP into a specialized agency. UNEP is an effective organization, the UNEP Governing Council is an able policy-making body, and the Global Ministerial Environmental Forum already has engaged, universal participation.

C. Achieving effectiveness, efficiency and coherence within the United Nations system.

1. Clustering secretariat functions and common services--establish a mechanism for global, overall coordination among existing MEAs, with one mechanism having innovative tasks that are not performed by MEA Secretariats individually, and without prejudice to their decision making and budgetary independence. This would include joint MEA institutional structures, including: 1. Secretariats, 2. Legal, financial and conference services, 3. Reporting, 4. Scientific structures, 5. Programmatic structures 6. Knowledge management and IT.

The United States has a number of concerns and questions about this option, which requires significant further discussion. From an administrative viewpoint, there is a clear argument to be made for considering this option. However, any pooling of functions must make sense; combining administration functions for secretariats that are subject-matter similar, reside in the same institutions, and/or geographically co-located would be most practical, and would need to be considered on a case-by-case basis. Such an approach could help improve delivery of services and must improve cost-effectiveness. Any clustering of services cannot impinge on decision-making matters or the commitments of Parties. We note as well that clustering secretariat functions and overall coordination among existing MEAs are two separate issues, and that all policy-related matters are the purview of COPs. **We think it prudent to see the results of the chemicals synergies process before considering any administrative clustering for other MEAs.**

2. Establish a UN system-wide medium-term strategy for the environment, coordinating all environmental activities for the UN.

The United States would like to invite further discussion on this option. The UNEP MTS is not appropriate for the entire UN system, but another strategy may be useful as a guide for agencies in carrying out work. However, we note that every UN body has a specific mandate, and any coordination should be at the level of activities only. We also believe that the EMG already helps to fulfill this need.

D. Securing sufficient, predictable and coherent funding.

1. Widen and deepen the funding base.

The United States believes that this may be an option worth exploring, and we would appreciate further discussion. We support exploring new approaches to seek voluntary funding for activities in UNEP's program of work, and other bodies working on the environment; however, a "mechanism" may be too formalized. We expect any fundraising activities to follow GC guidance and adhere to the priorities expressed in UNEP's Programme of Work, so as to support – and not divert from – core activities.

2. Establish a joint management mechanism for all major trust funds for the environment with equal roles for project selection, appraisal and supervision of environment-related activities, in accordance with the respective spheres of expertise.

The United States does not support this option. We have a number of concerns and questions regarding this proposal. Most specifically, we wonder how such a fund would prioritize disparate areas? Also, would one priority get all the funds? Further, how would this work for funding outside of the direct UN system? If the issue is lack of coordination of financing among MEAs, could that not be solved by improving the horizontal information flow rather than by establishing a new body with authority over all funds? Finally, this idea may have unintended consequences of adding additional bureaucracy and complication in areas where trust funds are operating effectively.

3. Link global environmental policy making with global environmental financing. Originally under b) 4 but at the request has been moved under d)

The United States does not support this option. Links between policy making and financing already exist. The GEF is the financial mechanism for several legally binding treaties, which provide the GEF with guidance on funding priorities through recommendations from the COPs. It would not be practical for the GC/GMEF to provide guidance on funding because it would be difficult and inefficient to negotiate funding priorities; the COPs have more expertise in this. We also note that some of the differentiation or fragmentation may actually be intentional and beneficial in terms of providing focus on particular problems.

E. Ensuring a responsive and cohesive approach to meeting country needs.

1. Establish environment-development country teams and/or desks in existing intergovernmental offices in developing countries around the world.

Based on the new information on the "Draft elaboration of ideas" paper, the United States believes that this option would be very difficult to implement, particularly as it requires changing UNEP's mandate, the nature of UNEP as an entity, and relationships within the UN system. We are certainly supportive of strengthening UNEP and the role of environment in UN work, but this option is rather extreme and runs counter to a number of recent UN decisions and program directions (notably One-UN and joint UNEP-UNDP activities). We also note that the cost implications alone may prove prohibitive. We would insist on extensive further discussion on this option. First, UNEP-UNEP cooperation should be increased to ensure environmental capacity in-country.

2. Develop an overarching framework for capacity building and technical assistance for the operational

	<p><i>activities of MEAs, UN agencies and IFIs.</i></p> <p>The United States believes that this option requires extensive further discussion before it could go forward. In general, guidance is useful, but frameworks can either be empowering or restrictive. Perhaps something more targeted than this proposal could be useful rather than taking on the whole MEA, agency, and IFI world at once – working only within the UN would be a better first step. We have historically felt that capacity building is best served by being integrated into the specific development and project components being.</p>	
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