



Reference: G121-0929

Comments by Switzerland on the Draft Declaration of the Belgrade Ministerial Conference (Rev.2 of possible elements, as of February 16, 14:30h).

Switzerland welcomes the substantive elements included so far in the draft.

Part III is very sketchy at this point because substantive negotiations are still lying ahead. It is important that text that is included in part III is based on broad consultations with all parties and the organizations involved in carrying out specific mandates of the EfE ministerial conferences.

Our specific comments, following the current order of paragraphs, are the following:

Introduction

§3 We fully agree that the differentiation in the EECCA region is an important challenge for the EfE process. This challenge has to be seen against the background of a common legacy of environmental legislation and policy implementation in the EECCA countries. How to maintain a common framework while addressing the different trajectories of the countries of the EECCA region, is important for the architecture of the EfE process and perhaps its single most important challenge.

§4 In our view, a major reason for retaining the EfE framework remains the responsibility of the ECE region for addressing global environmental challenges in a regional pan-European framework. "Global" and "regional" environmental challenges are essentially the same but need to be addressed in a way that is specific to each region. What counts are regional actions that address substantive issues such as those mentioned in this para (climate change, chemicals, biodiversity). These global challenges are addressed by the partners of the EfE process already, a fact that needs to be acknowledged here.

I. Evaluation and Implementation

§9 Some of the items mentioned here (accelerating ratification, expanding capacity-building, etc.) should be part of the "deliverables" of the conference and could be moved to part III of the declaration.

§10 The term "soft instruments" is not clear. In addition, it is hard to argue for "increasing the impact" of a soft instruments other than by turning it into a binding instrument. The idea expressed in this para needs to be explained better or the para deleted.

Add new para after §11

While recognizing the achievements of the countries and the regional Initiatives and the pan European cooperation for biodiversity under the PEBLDS we recognize the challenges that remain to achieve in time the global biodiversity 2010 target. We are reconfirming our commitment to achieve the 2010 targets and the Kyiv Resolution to implement this target at the paneuropean level.

II. Capacity building and partnerships

It is appropriate that the focus of this section is on the activities and partnerships that have been developed in the region to build capacity to address priority environmental issues. Given the very general heading of the section, a wide range of items has already been included. The approach to its further development should thus be inclusive rather than inclusive.

Revise § 19 (a similar proposal is, we believe, being made by Nordic countries):

§19 rev: *Agree to pursue the WSSD 2020 target on chemicals by improving the chemicals management in countries of the region, including addressing old legacies. Support the implementation*

of the Strategic Approach to International Chemicals Management (SAICM), and encourage to consider ratification and implementation of international agreements on chemicals and hazardous waste. Support a better global regulation of mercury and other chemicals of global concern, the strengthening of the Aarhus protocols on POPs and Heavy Metals and improved synergies between MEAs, to facilitate improved chemicals management in the region.

Add item on biodiversity **after §19**

Recognition of the need to strengthen regional initiatives by promoting partnerships and capacity building with all stakeholder to achieve the 2010 targets and to implement the Kyiv Resolution under the PEBLDS.

III. The way forward

§24 It needs to be clarified what kind of “links” between problems and responses this para should introduce. Does the para try to say that these links are not clear, or not strong enough? In many cases, the EfE process already provides a framework or forum for an institutionalized response to environmental problems – for example through the EnvSec Initiative for Environment and Security, or through PEBLDS in the area of biodiversity, or on a more general level through the EAP Task Force for strengthening environmental policy-making. However, there is often a lack of clarity on the specific outcome expected – this para could therefore be an introduction for the more specific items mentioned under §25.

§25 This para 25 should in our view treat the substantive commitments of the EfE process in the future: its “deliverables”. Currently, the list of bullets assembled under this para needs still a lot of work. We support the general approach that outcomes and commitments are what is expected from the Belgrade Conference, as was apparent from the emphasis given to the notion of “deliverables” so far. Clearly, the term “deliverables” can mean very different things and requires clarification. So far it includes confirming mandates, renegotiating strategies, prioritize implementation gaps, set new commitments and reconfirm old ones, commit to partnerships, dialogues, and also welcoming new funds. The idea of “who does what in what framework” is not explicit in some of the bulleted items, and a balance must be found between “new” and “old” deliverables. Currently, there are too many new items listed here.

On more specific items, we would like to comment the following:

- EECCA strategy: retargeting does not seem a good option, as it would mean opening an additional parallel negotiation. We prefer this issue to be discussed as part of the future organization and priority areas of the EAP TF.
- Integration of Biodiversity: we welcome the inclusion of this aspect.

Making the deliverables as concrete and time-bound as possible will also require to relate some of them to the contents of §26 (Future of the process) or even moving parts of 26 to 25.

§26 Pending further negotiations, we think that this para should look at the operational aspects of the future process. We understand that the list of bodies included so far is not comprehensive. These need to be included either under this § or §25 (e.g. PEBLDS). An important aspect of §26 will be the organization of the EAP Task Force / PPC after Belgrade, and in particular on the issue of secretariat functions, and their (partial) transfer to institutions in EECCA countries.

Berne, March 15, 2007