



February 27, 2004

Open Ended Working Group:
Comments on the Draft Guidance to the Financial Mechanism

The International Persistent Organic Pollutants Elimination Network welcomes the opportunity to participate in the Open Ended Working Group and submit our comments on the current Draft Guidance to the Financial Mechanism.

The International Persistent Organic Pollutants Elimination Network (IPEN) is a network of 350 NGOs and community-based groups around the world working together to eliminate persistent organic pollutants (POPs) and other persistent toxic substances. Our network played a key role in the international negotiations that resulted in the adoption of the United Nations Stockholm Convention on Persistent Organic Pollutants. IPEN participating organizations are currently working to help implement this internationally binding treaty and to raise the level of awareness about toxic substances throughout the world: especially in developing countries and countries in transition. The IPEN Steering Committee promotes the development and implementation of activities, policies and goals based on our common platform – the IPEN Stockholm Declaration – and/or based on decisions of the IPEN General Assembly.

The IPEN Steering Committee has prepared these comments in response to a letter dated October 31, 2003, in which UNEP Chemicals invited nongovernmental organizations, along with governments and others, to participate in the Open Ended Working Group and comment on the October 2003 Draft Guidance to the Financial Mechanism.

Our comments focus on Section 3, Programme Priorities, of the Draft Guidance to the Financial Mechanism. We include the original text for Section 3 below, and indicate our suggested changes with underlined text. We follow each suggested change with an italicized note that explains our reasoning.

If the secretariat has any comments or inquires about this submission, please contact the IPEN International Coordinator, Björn Beeler (BjornBeeler@ipen.org).

Suggested Changes of the IPEN Steering Committee to the Draft Guidance to the Financial Mechanism: Section 3, Programme Priorities

3. Programme Priorities

Priority should be given to the funding of activities that enable Parties to fulfil their obligations under the Convention, in particular:

- development, review and update, as appropriate, of national implementation plans, pursuant to Article 7 of the Convention;
- development and implementation of activities identified in the national implementation plan as national or regional priorities;
- activities that support cooperation and consultation of national stakeholders to facilitate development, implementation and updating of national implementation plans;

Note: This programme priority is derived from Article 7.2. The first and second bullets above deal respectively with Art. 7.1 and Art. 7.3. In light of the fact that the Convention recognizes “the important contribution that the private sector and non-governmental organizations can make” toward addressing POPs, and that Art. 7.2 requires Parties to appropriately cooperate with stakeholders in the NIP process, this important Art. 7 provision should be explicitly reflected among these programme priorities.

- assist countries to reduce the need for specific exemptions;
- activities that support or promote capacity-building, including human resource development and institutional development and/or strengthening;
- activities that promote the improvement of public information, awareness and education on persistent organic pollutants.

Note: This programme priority is required by Article 10, which is a Convention obligation separate and additional to the obligations of Article 7. A precedent for including this programme priority in this guidance document may be found in the Framework Convention on Climate Change, Decision 11/CP.1, “Initial guidance on policies, programme priorities and eligibility criteria to the operating entity or entities of the financial mechanism,” at paragraph 1(b)(iii).

- activities that promote and provide access to technical assistance through appropriate arrangements;
- activities that promote transfer and cooperation for joint development of technology to eligible Parties; and

Note: The additional language will facilitate the development of country-appropriate, endogenous technological capacity to deal with POPs. A precedent for including this programme priority in this guidance document may be found in the Convention on Biological Diversity, Decision I/2, annex I, “Policy, Strategy, Programme Priorities and Eligibility Criteria for Access to and Utilization of Financial Resources” at paragraph III.4(f).

- technology demonstration projects responsive to priorities identified in the national implementation plan and take into account relevant guidance of the Conference of the Parties.
- Activities that provide access to other international, national and/or private sector funds and scientific and technical cooperation, and that channel those resources to the local and national levels, including through non-governmental organizations and private sector entities.

Note: This programme priority reflects the fact that the Convention recognizes the importance of facilitating access to funding that goes beyond that provided through the Stockholm financial mechanism. See Art. 13, paras 3, 7(c) and 7(e). Precedents for including this programme priority in this guidance document may be found in the Convention on Combating Desertification, Decision 24/COP1, annex, “Functions of the Global Mechanism,” at paragraph 2(b); and the Convention on Biological Diversity, Decision I/2, annex I, “Policy, Strategy, Programme Priorities and Eligibility Criteria for Access to and Utilization of Financial Resources” at paragraph III.4(h).