



IOE comments on the paper Stakeholder Engagement at UNEP - Draft Policy - 4 December 2013

Thank you for giving the IOE the opportunity to comment on the paper

Mission of the IOE

The International Organisation of Employers (IOE) is the largest network of the private sector in the world, with a membership of 150 business and employer federations in 143 countries. In social and labour policy debate taking place in the International Labour Organization, across the UN and multilateral system, and in the G20 and other emerging processes, the IOE is the recognized voice of business.

The IOE seeks to influence the conditions for doing business, including by advocating for regulatory and other frameworks at the international level that support entrepreneurship, private sector development, and sustainable development. This will enable businesses to work with others to tackle the global challenges we face today.

The IOE supports national business organisations in guiding corporate members in matters of international labour standards, business and human rights, corporate social responsibility, environment and sustainable development.

IOE specific interest with the environment and sustainable development

- The IOE recognises that valuing the environment and working towards sustainable development is a key driver for enterprises to engage with their supply chain and their customers and to enhance their reputation.
- Businesses contribute to making enterprises sustainable and growing employment prospects and economies, which help achieve the wider sustainable development goals.
- The workplace is an important source and place of information and education on environmental and sustainability issues. Information provided to workers can permeate to the family and community
- In many countries, the employer may be the only, or best, accessible source of environment and sustainable development information and interventions or may be the financial provider for access to relevant services.
- As the IOE represents businesses across all sectors, sizes and geographies through their national employers' organisations, we recognise that there are both challenges and opportunities for businesses from issues surrounding environment and sustainable development.

IOE engagement with UNEP

IOE has enjoyed recognition and accreditation to the Major Groups of UNEP for many years. It is accredited with ECOSOC and would wish to receive continued UNEP accreditation

We fully endorse the need for UNEP engagement with stakeholders that can provide added-value. We support the overarching principles and approaches being discussed that engagement should be based on:

- Acknowledgement of the inter-governmental nature of UNEP processes
- Systematic participation in all decision-making instances
- Transparency and accountability for mutual benefit
- Respect for diversity of views and respect for self-organisation
- Non-regression on current engagement practices

The IOE believes that it can make a considerable contribution to the proposed functions of a global coordination mechanism by

- Advocating and raising awareness
- Brokering knowledge and information:
- Encouraging innovation:
- Promoting multisectoral action:
- Promoting accountability:

The IOE added-value to improve the environment and help deliver sustainable development is by leveraging the workplace as a means of providing information and action for all workers, their families and communities. For this to be most effective it is also necessary for member States to engage stakeholders such as Employers' and business organisations in discussions and policy development at national level and the IOE is able to support national Employers' and business organisations in that engagement.

IOE specific views: Draft UNEP Policy on Stakeholder Engagement

The IOE recognises and supports the UNEP's efforts to enhance Major Group and Stakeholder (MGS) engagement in its work across agenda setting, policy deliberations and implementation and notes that

- Business has collaborated and partnered with UNEP in many initiatives over the years, and appreciates UNEP's dedication to openness and substantive engagement for Major Groups and Stakeholders, including business; the progress in this area made over the last ten years has advanced UNEP's work, and provided lessons in good practice.
- UNEP's arrangements have provided opportunities both for multi-stakeholder interactions, such as at the Global Major Groups and Stakeholders Forum (GMGSF) meetings and Major Groups Facilitation Committee (MGFC), but also for single constituency activities. UNEP has also offered options for both globally organized constituencies to take part as well as for groups with regional perspectives. We hope this flexibility and range of options can be maintained and strengthened.
- The impact of UNEP work is very wide and it is important that those affected have an influence on the work of UNEP. But it is even more important that those who can most help UNEP achieve its mission have the commensurate influence.

As UNEP is seeking to expand the categories of Stakeholders beyond the 9 Major Groups to a wide variety of constituencies, including Environmental NGOs (as distinct from other NGOs), social movements, families and citizens, among others, as well as restructure the interface for Major Groups and Stakeholders to UNEP HQ in Nairobi, based in large part on regional representation, we believe the following challenges need to be addressed

Supported and phased introduction of new stakeholder categories

Major Groups are recognized in Agenda 21 as partners in implementation, with a stake across a broad range of issues, as set out in the respective chapters of Agenda 21. We continue to see the value of a distinctive and privileged role for Major Groups across UNEP's entire work program.

We also see great opportunity in broadening the involvement of other stakeholders in UNEP, especially where these stakeholders can assist with specialized knowledge, in informing policy deliberations and assisting implementation.

However, rapidly introducing several new categories of stakeholders, putting all stakeholders on the same footing with Major Groups and obliging Major Groups and Stakeholders to organize in the same ways, all at the same time -- as the draft policy seems to suggest -- raises several questions and poses potential practical problems in that:

- addition of numerous stakeholder designations could overwhelm resources that are already stretched.

- it could make it more difficult for groups with particular expertise or focused contributions to be involved.

The IOE believes that a phased process of transition should be followed to introduce new stakeholder categories and consider options for new structures and modes of interaction that would appropriately include them. It is also critical to ensure that adequate resources are in place to support new groups.

The draft policy raises several issues that should be clarified as part of this transition:

- What is a “general” NGO (as distinct from an “environmental” NGO)?
- How are citizen and social movements defined? Would political parties be included? How would this potentially very diverse range of interests coordinate with one another to designate their representatives or come to agreement on common messages?
- How would diverse and disparate categories of NGOs (disabilities; foundations; volunteer groups, older persons, migrants, etc.) organize to select a combined representative when needed to do so, and arrive at shared views?
- How would UNEP accreditation criteria be satisfied by some of the new stakeholder groups?
- What mechanism would UNEP use to validate accreditation?

New Regional Level of Representation

The draft policy proposes instituting a regional level of representation for both the MGs and stakeholders, from which global representatives would be selected. This poses particularly the following practical difficulties that need to be resolved:

- Not all UNEP Regional offices maintain consistent practices for their consultations with MG/S. For example, not all MGs are involved in UNEP Regional office consultations.
- Some constituencies are not structured entirely along UNEP’s regional lines. Business and trade unions are 2 examples of globally networked groups that do not align with the regional structures as proposed in the draft policy.

Major Groups and Stakeholders Body

The draft policy seems to propose a Major Groups and Stakeholders Body, made up of 72 Major Group and stakeholder representatives, to “coordinate” participation; this body also appoints 12 members to serve as a “secretariat.” It is not entirely clear whether this coordination would be limited to the regional level or also include global level effort.

A group of this size can provide a forum for sharing of information and discussion among stakeholders, but it is probably too large to undertake coordination or other day to day work, especially during a UNEA meeting. We would strongly encourage a much simpler and smaller body, modeled on the current Major Groups Facilitation Committee (MGFC).

Conclusions

The IOE believes that the following actions should be considered:

- Maintaining the 9 Major Groups categories, with an additional seat in NGOs reserved for ENGOs, and building on this as the core of a reinvented MG/S Facilitating Group. In this regard, giving consideration to where each of the 9 MGs can make additional contributions in support of UNEP’s work program.
- Encouraging clear criteria and definitions for new categories of stakeholders, starting with those explicitly mentioned in recent decisions, i.e. people with disabilities and volunteers organizations, for a transition that would add them to the MG/S Facilitating Group;
- Offering guidance on how stakeholders do take part, so that stakeholders have a common understanding and expectation.
- Giving consideration to involving different groups of stakeholders on a case by case basis, relevant to the particular issues under discussion, where they might be impacted or have a particular solution to share, and the role which various stakeholders can play during UNEA.

Consideration could also be given to dedicated discussions or other forums that would allow new stakeholders to contribute their perspectives on their priority issues.

- Encouraging UNEP Regional offices to follow consistent basic practices in engaging with major groups and stakeholders, so that the system evolves to a common set of practices.
- Allowing those groups that are globally networked to select their own regional and global representatives directly, and nominate them to the regional groups' meetings.
- Recognising the importance of building on what has worked well in UNEP's procedures for working with MG/S. As the UNEA begins its work, it is likely that adjustments will need to be made, and this should be built into stakeholder expectations so that the effort to strengthen substantive engagement of stakeholders will continue to evolve with UNEA itself.

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