

## UNEP's comments to the CMS Future Shape, Phase II Report:

### **General comments:**

Although the report has condensed the options to a manageable and understandable size, the presentation of the report in general does not allow for an easy reading, evaluation and comparing of the options. It is unclear why certain activities have been assigned to one option and not others. In fact activities in different options are in many cases not mutually exclusive and therefore could have been clustered in a more functional and synergetic way. Furthermore, the criteria used for ranking the activities are highly subjective in most cases. The values given to the conservation, integration and synergies merits of some activities can be easily challenged. In addition, institutional effects are considered always as negative, perhaps because in great scale, staffing was the criteria used. This makes it very difficult to know which option to choose, as the format in which it is presented is quite subjective and detailed. The Executive Summary does not offer a clear vision of the options and their pros and cons. It is very difficult to assess the feasibility or efficiency of any of the action points under the different options, without having a clear estimation of its financial and personnel implications.

The document is not focused enough on institutional issues, which should be the basis for the review of the Future Shape. Some of the action points mentioned in the four options are very detailed and technical and go beyond the objectives this study should achieve. For example, some of the options call for greater scientific collaboration and better coordination of research programmes, etc. Greater cooperation should be emphasized, but only at institutional level. The Report could benefit more if it concentrates on issues of Synergies and coordination in administration of the Convention and its agreements as the core aim instead of combining the administrative issues with technical issues.

Collaboration with other MEAs: this is definitely an area where a lot could be done, but once again, it might be outside of the scope of this study. It would be very difficult, or impossible to influence what happens in other processes linked to biodiversity conventions; in any case, it would not have direct effects in the efficiency of the CMS Family. It is better at this stage to focus the improvements on internal processes linked to the support of integration of the CMS Family and its agreements and MOUs. In other words, let's concentrate our efforts on what we have power over, and what we can influence directly.

### **Comments on Executive Summary and Conclusion:**

The foundation for determining whether an impact is positive/beneficial or negative depends on which angle we look at. It is obvious that conservation effects, promotion of integration within the CMS Family, and the promotion of synergies with external organizations are all aspects that would be positive if achieved. However, institutional and legal effects could very well have a positive twist depending on how they are presented, and which direction they flow, Option 1 on Concentration is concrete and focused on actions within the direct Secretariat reach, which makes it achievable. The assessment made gives this option a low rating in terms of impact, but the action points seem to be feasible internally.

Option 2 on Decentralisation is tempting as it has low financial cost and a high impact compared to the others; however, it remains an option which is geared a lot towards outside partnering and external institutions, which makes its implementation more difficult. It underestimates. The contribution and rationale of two of the activities to the objectives of this exercise is difficult to establish: those are activity 3 on the establishment of new agreements outside of the UNEP family and activity 9 on the partnership with local and indigenous communities. The other activities might generate more costs than actually estimated. The development of regional hubs, partnering with NGOs and MEAs, and monitoring and assessment all require proper funding, no matter how enhanced the efficacy of the activities become.

Option 3, the ideal option seems very attractive, remains unrealistic and expensive. The whole idea of looking at some institutional reform is partly to save on money and other types of resources. This option being outrageously expensive, it defeats the purpose of the whole exercise.

Option 4 is the low cost one. However, if it does not result in delivering economies of scale across CMS, nor does it solve the resources saving issue, then it should be also considered activity per activity, but not as an option as a whole.

One distraction, however, is the different focus of questions used, scoring used and analyses undertaken for each of the option. This may make the reader confused about how to compare each of the options on their face value.

#### **Suggestions for improvement of the report:**

It would probably be useful if the paper could also explore ways and means to improve the fundraising and administrative functions of the Secretariat of the CMS, including common services at those levels. This would help in avoiding duplication of efforts from agreements, MOUs, etc... It might be a good idea to have a clearinghouse mechanism which would centralize all administrative, personnel and financial functions linked to the CMS Family as a whole. Doing this might improve the staffing level needs and allow for common actions to be taken on behalf of the group forming the CMS Family. This would of course save resources, as fewer actions mean less money spent.

Another area that might be helpful to look at is the workload of the staff. There might areas where mergers of roles might be effected, which would allow the same person to cover more. Synergies/mergers between the different agreements would help, as common objectives could have common plans of action, resulting in less operational cost.

To come to an optimum solution for the Future shape, it might be smarter to look at all options, and initiatives clustered within each of them, together, and start picking which activities within these options to consider. This could be done taking into account three criteria, including the cost of the activity, its practicability within a certain timeframe, and its feasibility within the scope of the Secretariat. Activities would have to be realistic and achievable. As the report classifies activities and treats them individually, it makes it easy to see what the merit of each of them is.

Finally, the paper also has some uncommon understandings on issues such as IPBES that may reflect lack of clarity on the part of the presenter with those processes. This needs to be avoided to get more credibility to the arguments presented thereof.