

# UNEP Management Response to the Evaluation of the Subprogramme Chemicals and Pollution Action 2015-2024

## A. Introduction

An [evaluation of the Subprogramme on Chemicals and Pollution Action](#) (SP-CPA) was conducted by the UNEP Evaluation Office, covering the period from 1 January 2015 to 31 December 2024. The evaluation resulted in **five recommendations** (para. 33 of the Executive Summary of the [Evaluation Report](#)).

This document outlines the **management response** to these recommendations, elaborated by the Industry and Economy Division, as lead for the Chemicals and Pollution Action Subprogramme. In preparing the recommendations' implementation plan to be submitted to the Evaluation Office, management will keep consulting with relevant Divisions and Offices, considering that several of the issues identified require UNEP-wide input.

## B. Overall response

UNEP Management welcomes the Evaluation of the Chemicals and Pollution Action Subprogramme and its contribution to effective delivery of the Medium-Term Strategy (MTS) 2026–2029 and Programme of Work (PoW) 2026–2027.

As recognized in the evaluation report, UNEP management has already put in place changes to address challenges identified by the evaluation, in the latter part of the period under evaluation. In particular, UNEP management initiated a shift toward stronger technical capacity, greater programmatic integration, and enhanced institutional coherence. The results framework embedded in the MTS 2026-2029 and POW 2026-2027 also largely addresses the evaluation's suggested action.

The UNEP management response will identify action areas to address the recommendations in a cohesive and integrated manner. UNEP will build on changes already initiated, while taking into consideration the current resource-constrained context and ongoing reforms as part of UN80. In defining the response actions, UNEP will also consider the suggested actions identified in the evaluation report for each of the recommendations (section 3.3 of the Evaluation Report).

## C. Management Response to the evaluation's recommendations

The UNEP management response for each recommendation is summarized below. Unless otherwise indicated, most actions will be implemented by December 2027, and UNEP Management appreciates the support of the Evaluation Office in tracking and reporting on progress.

**Recommendation 1: Strengthen Strategic Planning and Continuity Across MTS Cycles.** Ensure that future iterations of the SP-Chemicals and Pollution Action maintain strategic continuity across MTS cycles to support long-term coherence, learning, and impact assessment.

### **Management response: Accepted**

UNEP welcomes the recommendation, which has already been taken into account in the design of the new [Medium-Term Strategy 2026-2029](#) and [POW 2026-2027](#). The new PoW 2026–2027 is guided by a single *Impact Framework*, which clearly articulates pathways, impacts and outcomes for achieving UNEP's strategic objectives across climate stability, living in harmony with nature, and a pollution-free planet. A dedicated theory of change for the Chemicals and Pollution Action Subprogramme is currently under development to further guide internal strategy implementation. The PoW 2026–2027 includes both **impact- and outcome-level**

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**indicators**, including measuring policy change and shifts in industry behaviors. As such, a significant part of the recommendation has already been adopted by management as useful improvements to the Chemicals and Pollution Action framework.

Under the new Medium-Term Strategy 2026–2029, the thematic areas of the Chemicals and Pollution Action Subprogramme remain fully aligned with, and build upon, those of the MTS 2022–2025, with an increased emphasis on supporting member states in addressing chemical pollution from key sectors that were previously part of the previous strategy but now with **a more comprehensive strategy on how this can be done to address, in tandem, the economic, social and environmental contexts of countries.**

Additionally, the recommendation will be useful in the implementation phase of the MTS 2026-2029 and POW 2026-2027. In further developing the project portfolio for the Chemicals and Pollution Action subprogramme, UNEP will **align all projects to the new MTS and POW results framework and indicators**, while ensuring continuity with the previous cycles. **Long-term result measurement considerations** will be included in a strengthened impact measurement approach. UNEP will also look into strengthening internal systems **for planning, management and reporting** on projects, to facilitate the aggregation of project-level reporting at the subprogramme level.

These efforts are expected to result in better alignment of efforts and resources towards the expected impact of the subprogramme, i.e. reduced exposures to hazardous chemicals and pollution, and better ability for UNEP to track progress over time, which in turn will help identify areas needing additional investment or corrective strategies.

**Recommendation 2: Strengthen SP-Chemicals and Pollution Action Governance and Strategic Coherence.** Improve internal governance, coordination mechanisms, and accountability to enhance SP-CPA's ability to deliver coherently across Divisions and Regional Offices.

### **Management Response: Accepted**

UNEP welcomes the recommendation as an opportunity to further strengthen impact potential, coherence, and accountability, and will address this recommendation taking into consideration existing procedures, roles and structures as currently defined, the resource-constrained context in which it is operating, and ongoing UN80 reform.

The project portfolio developed in implementation of the Medium-Term Strategy 2022-2025 has already been shaped to **ensure coherent delivery on key priorities across all relevant UNEP Divisions and Regional Offices**. The portfolio is composed of UNEP-wide projects, particularly **focusing on the most critical topics for addressing pollution, including plastic pollution and pollution-related issues with other sectors, such as textiles, mining and the minerals value chain, electronics**, and chemical pollution, including pesticides, in **agriculture**. The portfolio will also continue to include work on **air and water quality** and on addressing the environmental drivers of **antimicrobial resistance**. Working with **capacities across UNEP** is now fostering substantive alignment as a result of joint implementation across divisions and regions. In line with UNEP's Delivery Model Policy, all the projects of the Chemicals and Pollution Action Subprogramme have been developed through **co-creation with Regional Offices** to ensure contextual relevance, ownership and coordinated delivery.

UNEP will further institutionalize regular inter-divisional and inter-regional strategic planning to proactively steer and inform the continued development of the Chemicals and Pollution Action portfolio, inform resource mobilization and thus ensure coherent and impactful delivery globally.

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UNEP will also identify **internal capacity gaps** and recommend measures to address these capacity gaps and strengthen its delivery capacity and responsiveness, taking into account the current resource constrained context. **UNEP management will carry out a six-monthly review of performance against results**, discussing among the leads of each area of focus the progress, and the areas for which UNEP will add value to that of the partners it will work with. This review will be used for determining corrective actions and to further steer the portfolio.

**Recommendation 3: Improve Delivery through focused Portfolios, Knowledge Systems, and Sustainable Resourcing.** Strengthen the operational delivery of SP-Chemicals and Pollution Action by streamlining its portfolio, investing in institutional learning, and addressing resourcing gaps.

### Management Response: Accepted

UNEP welcomes this recommendation and has already begun implementing it. During the MTS 2022–2025 period, a more focused portfolio was developed under the themes of *Circularity in Sectors, Towards Zero Waste and Pollution and Health*. Both GEF-financed and other donor- financed projects were fully aligned to the Chemicals and Pollution Action subprogramme results framework. This focused portfolio has enabled UNEP, with its partners, to **consolidate efforts and align resources around core priorities**. In this next MTS 2026-2029 period, this portfolio will concentrate on key sectors and issues as noted above, where work on **circularity in sectors includes consideration of chemical pollution**, and where **action on waste management concentrates, as a first solution, on eliminating waste generation in the first place**. This strategy is proving already to enable countries to use resources more efficiently where material use, efficiency considerations, and reuse are critical for benefiting economies.

UNEP will further invest in resource mobilization, aimed at securing a more diverse funding base and at addressing resourcing gaps. GEF-9 will start in July 2026, and **UNEP will engage with member states to understand their priorities within the work of this subprogramme that are eligible for GEF financing**. The Global Environment Facility (GEF) is to date the most significant financing mechanism at scale for the Chemicals and Pollution Action subprogramme, while other smaller funding mechanisms, such as the Global Framework for Chemicals Fund and the Special Programme, provide funding for supporting countries in creating the policy and legal enabling environment for addressing chemical pollution. Such an approach will allow UNEP, and the member states it supports, to use these **financing streams in complementary ways**, adding value and efficiency in the use of funds. UNEP will further bring together **more consolidated reporting** across these funding sources to inform funding decisions, including in the use of the planetary funds.

UNEP will further **institutionalize learning** for the Chemicals and Pollution Action Subprogramme, through using its **main internal knowledge management system** to serve as a home for knowledge on solutions for addressing chemical pollution. The aim will be to facilitate continuous learning and alignment of efforts, and to enable teams at various levels to effectively promote pollution prevention objectives, including as part of United Nations Sustainable Development Cooperation Frameworks.

**Recommendation 4: Catalyse Green and Circular Markets as a Strategic Delivery Mechanism.** Position SP-Chemicals and Pollution Action as a driver of market transformation and innovation through targeted engagement in priority sectors. SP-Chemicals and Pollution Action can catalyse green and circular markets by combining its normative role (science, policy, standards) with UNEP's finance and economic expertise via

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the Finance and Economic Transformation subprogramme. This creates a powerful delivery mechanism: market transformation as a driver of sustained pollution reduction, closing the gap between policy ambition and real-world impact.

### Management Response: Accepted

UNEP welcomes the recommendation and has already shifted its programmatic focus in this direction, with a strengthened focus on supporting interested countries that wish to promote circular, zero-waste and pollution-free sectors and value chains. This enhanced focus is embedded in the MTS 2026-2029 and builds on the strategy and progress made during the previous MTS and POW cycle.

UNEP management recently reframed its work towards industry innovation alongside chemicals and health **with the aim of bringing pollution considerations alongside market opportunities**. Industry and Economy Division is also **increasing its capacity to support interested countries in looking at the opportunities that the growing green chemicals markets** can create for their economies. The aim is to enable countries to promote shifts in key sectors of the economy that bring economic and environmental benefits in tandem.

**The economic case for action which will be discussed at the Conference of the [Global Framework on Chemicals - For a Planet Free of Harm from Chemicals and Waste](#)** for which UNEP provides the secretariat, is also a step in this direction. As part of the redefined structure for the Industry and Economy Division, industry innovation and chemicals and health will bring together **a more coherent approach to circularity, waste reduction and finance to ensure they are closely aligned** in project design and fund mobilization efforts. Industry engagement, sustainable finance and sectoral actions will continue to be strengthened across the entire Chemicals and Pollution Action portfolio.

**Recommendation 5: Elevate the Visibility and Political Salience of the Pollution Agenda.** Enhance the visibility, influence, and strategic positioning of SP-CPA by framing pollution as a public health and development issue and integrating it more deeply into UN and national platforms.

### Management Response: Accepted

UNEP welcomes the overall recommendation as an opportunity to further strengthen the visibility of the pollution agenda, particularly given the **costs incurred to the public health budget**, and to the **increasing risks of antimicrobial resistance** as a result of environment-related causes of resistance. This visibility is also needed owing to the **opportunities that economies can harness** given the **return on investment for circular economy and the reuse of resources and products without them becoming waste**, and the **new market opportunities that green chemicals present** given the trends that are showing market growth. The importance of pollution for health and economies is now embedded in the narrative of the MTS 2026-2029 narrative and in UNEP's communication efforts and is at the core of its programmatic work and of policy initiatives like the **Global Framework on Chemicals**.

UNEP will further strengthen these efforts, including by raising awareness during relevant fora, such as the **High-level Political Forum**, by continuing its efforts to develop knowledge efforts, and by continuing to actively promote the implementation of the **Environment Management Group's [UN Common Approach towards a Pollution-Free Planet](#)** with the engagement of all relevant UN agencies. UNEP will finalise and disseminate knowledge materials to support UNEP focal points in their efforts to promote the stronger

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uptake of the pollution agenda in United Nations Sustainable Development Cooperation Frameworks.

**Industry actors across high impact sectors and the investor community are increasingly showing interest in the costs but also the market opportunities** that are relevant to this subprogramme. UNEP will determine how to engage with this growing trend to see how to enhance its support to member states.

Actions in response to this recommendation are contingent on the availability of resources and UNEP will respond to the extent possible in the context of existing initiatives, such as the Global Framework on Chemicals which will regularly report on progress. The [Intergovernmental Science-Policy Panel on Chemicals, Waste and Pollution \(ISP-CWP\)](#), to which UNEP provides secretariat services, might also play a key role to this end, but this is beyond the scope of this evaluation's management response.