

Comments on the zero draft High-Level Declaration from A Group of NGOs

1. Human health, human rights and environmental protection should form the foundational principles of all commitments highlighted in the Bonn Declaration. The aim of the new framework is to protect human health and the environment from toxic chemicals and waste exposure, which is why it is inappropriate to start the Bonn HLD by praising how useful chemicals are, while the instrument will have to address numerous problems caused by chemicals and waste. Starting the Bonn Declaration with the statement that “chemicals are essential for providing the food we eat; the clean water we drink; ...” leads to confusion and misunderstanding of the idea and essence of the Bonn HLD.
2. The Bonn Declaration should begin with recognizing threats from exposure to toxic chemicals and waste, pointing out that hazardous chemicals, including pesticides, contaminate all environmental media, food and people and cause premature deaths among workers, Indigenous Peoples, and other groups in vulnerable situations, including women, children, and babies.
3. Chemicals and waste contribute to the three planetary crises. Chemicals have already exceeded planetary boundaries. Second, the Bonn Declaration should note that environmental pollution from chemicals and waste contributes to climate change, and climate change simultaneously exacerbates the effects of pollution. Moreover, exposure to chemicals and waste is one of the main drivers behind biodiversity loss, occurring at an unprecedentedly high rate. The Bonn Declaration should also highlight that the annual production and release of chemicals is growing, outstripping the global capacity for ecosystem remediation, negatively impacting a range of human rights, including the right to a clean, healthy, and sustainable environment.
4. The Bonn HLD should not be less ambitious than the Dubai Declaration that among other things states, “We commit ourselves to respecting human rights and fundamental freedoms, understanding and respecting ecosystem integrity and addressing the gap between the current reality and our ambition to elevate global efforts to achieve the sound management of chemicals.”
5. The Bonn Declaration should recognize recent developments in addressing environmental and health issues and commit to their implementation. It should highlight that strengthening the sound management of chemicals and waste contributes significantly to the 2030 Agenda and the implementation of Sustainable Development Goals (SDGs) by protecting the environment, ensuring human rights for health and a healthy environment, supporting equity for the most vulnerable, and mainstreaming gender equality. Assessment and monitoring of chemical footprints in humans, biota and ecosystems is an essential component of sound management of chemicals and waste.

Paragraph 24 of the zero draft HLD should include strong wording that indicates the willingness of governments and other stakeholders to strengthen the work on sound chemicals and waste management to address the problems highlighted above:

- a) **Support human rights to the right** to life, health, **healthy** food, **safe** water and a clean, healthy and sustainable environment for all, and to protect present and future generations, with a focus on individuals, groups and peoples in vulnerable situations;
- b) **Support and monitor the implementation of** commitments from national legislative and enforcement authorities to develop and adopt the necessary legal chemicals and waste frameworks, strategies and action plans to improve the management and control of pollution from chemicals and wastes;
- c) **Support innovations, including making safer alternatives, including non-chemical approaches, ensuring information is available and accessible;**
- d) **Ensure for the whole of government and the whole of society approach. Its success requires political will and recognition at the highest level of government and relies on action and cooperation by all levels of government and by all actors of society.**
- e) **Ensure gender equality and empowerment of women and girls, and on reducing inequalities in the chemicals and waste management;**
- f) Enhance our action to implement and **fully comply** with other relevant chemical and waste multilateral agreements or commitments.

6. The Bonn Declaration should call for establishing an International Fund to implement sound management of chemicals and waste to ensure the availability and accessibility of adequate, sustainable, predictable financial resources based on the polluter-pays principle.
7. The Bonn declaration should highlight the link between specific objectives and targets and their specific indicators such as the chemical footprint to phase out chemicals of high concern and hazards. Both targets and indicators should be time-bound and lead to concrete risk reduction and hazard elimination. The bold goal for chemical footprint reduction is zero as soon as possible.
8. The Bonn Declaration should acknowledge the importance of using best available science that should be free from corporate capture and conflict of interest.
9. The Bonn Declaration should recognize synergies between the chemicals and waste framework and other multilateral agreements, standards and activities in various areas such as health, agriculture, labour, biodiversity, climate, human rights, and due diligence as essential to promote sustainable development and ensure the well-being of people and the environment. For example, recognizing synergies between the chemicals and waste sector and agreements and standards related to health and agriculture can contribute to the safe management and use of chemicals, minimizing negative environmental impacts, safeguarding food safety, and reducing risks to human health

and well-being. Existing chemical treaties provide limited coverage of the regulatory aspects related to the entire life cycle management of chemicals, making it challenging to implement measures for the sound management of chemicals effectively. Therefore, the synergy between the Beyond 2020 framework and existing MEAs must be prioritized as it establishes a framework that functions as an umbrella mechanism.

For further information and clarifications of our comments, please contact:

Olga Speranskaya, Alexandra Caterbow, HEJSupport, info@hej-support.org

Johanna Hausmann, WECF, johanna.hausmann@wecf-consultant.org

Clara Kraske, WECF, clara.kraske@wecf.org

Semia Garbi, AEEFG, Tunisie, semia.tgharbi@gmail.com

Shahriar Hossain, ESDO, shahriar25@gmail.com

Mariana Goulart, EEB, mariana.goulart@eeb.org

Gohar Khojayan, AWHHE, gohar.khojayan@gmail.com

Tuyana Norboeva, Eco-Accord, norboevatv@mail.ru

Sheila Willis, PAN-UK, sheila@pan-uk.org

Susan Haffmans, PAN-Germany, susan.haffmans@pan-germany.org

Ana Paula Souza, Human Rights Officer, Environment and Climate Change Unit, Development, Economic and Social Rights Branch, Office of the United Nations High Commissioner for Human Rights, ana.souza@un.org

Mari Carcamo, Coordinación de RAP-AL Uruguay, coord@rapaluruquay.org

Liz Hanna, Honorary Associate Professor, Institute for Climate, Energy & Disaster Solutions, The Australian National University, liz.hanna@anu.edu.au

Angela Pinilla, Clean Production Action, angela@cleanproduction.org

Mrinalini Rai, Women4Biodiversity, mrinalini.rai@women4biodiversity.org

Rico Euripidou, groundWorkSA, rico@groundwork.org.za