



Submission from the following organizations and stakeholders:

Health and Environment Justice Support (HEJSupport)

Swedish Society for Nature Conservation (SSNC)

Pesticide Action Network (PAN International)

Pesticide Action Network (PAN)

groundWork South Africa

Women Engage for a Common Future (WECF)

Armenian Women for Health and Healthy Environment (AWHHE)

Toxisphera

Commonweal

Rapal Uruguay

For questions, please contact:

Olga Speranskaya, HEJSupport: olga.speranskaya@hej-support.org

Alexandra Caterbow, HEJSupport: alexandra.caterbow@hej-support.org

Andreas Prevodnik, SSNC: andreas.prevodnik@ssnc.se

Meriel Watts, PAN: meriel@merielwatts.net

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

Zuleica Nycz, Toxisphera: zuleica.nycz@gmail.com

Maria Carcamo, Rapal Uruguay coord@rapaluruguay.org



VIRTUAL WORKING GROUP ON TARGETS, INDICATORS AND MILESTONES

REQUEST FOR ELECTRONIC FEEDBACK

Group Mandate: make proposals that progress work on this topic in lead-up to IP4, building on the outcome of the Technical Working Group as presented in meeting documents SAICM/IP.4/3 and SAICM/IP.4/INF/15. Specific tasks include:

- (i) Finalize the targets proposal currently set out in SAICM/IP.4/3, with a view to enable multi-stakeholder and multi-sectoral commitment and action, where appropriate;
- (ii) Develop a set of recommendations for a process to establish indicators and milestones for finalized targets.

Instructions for providing electronic feedback:

Please provide electronic feedback on:

Part (i) Existing text for targets under **Strategic Objective A.**

Part (ii) Existing text for targets under **Strategic Objective B.**

Please refer the following meeting documents for more detailed information on each target:

- [SAICM/IP.4/3](#) - Proposed targets prepared by the Technical Working Group on targets, indicators and milestones for SAICM and the sound management of chemicals and waste beyond 2020
- [SAICM/IP.4/INF/15](#) - Supplementary information on proposed targets prepared by the **Technical Working Group** on targets, indicators and milestones for SAICM and the sound management of chemicals and waste beyond 2020

Please submit your feedback and proposals to the SAICM Secretariat at saicm.chemicals@un.org, with a copy to delfina.cuglievan@un.org by **Friday, 13 November 2020**.

PART (i) Provide feedback on existing text for targets under **Strategic Objective A**

**please try to insert comments in revisions mode below*

We offer these suggestions for improved targets, because the existing targets are inadequate as they do not measure “impact” and place too much emphasis on “process”, a weakness that was specifically identified in the Evaluation of SAICM from 2006 to 2015: “The third SAICM outcome – monitoring progress through the 20 indicators - had a number of weaknesses.... the 20 indicators are outputs based, with the absence of a complementary set of indicators that assesses outcome and impact.”

Strategic Objective A: ~~Measures are identified, implemented and enforced in order to prevent or, where not feasible, minimize harm from chemicals throughout their life cycle and waste~~

Considerations: Intended to cover the need to effectively identify, select and address issues of concern that warrant global action. The intention is to cover topics similar in nature to those covered by the Strategic Approach, emerging policy issues and other issues of concern, as well as topics such as managing specific chemicals, the burden of disease and financing. There may be a need to develop and identify the criteria for issues of concern.

Target A.1 Countries/governments, in conjunction with all other stakeholders, develop and periodically review national implementation plans, including the work programmes for the Issues of Concern, in order to achieve sound management of chemicals ~~and waste~~ throughout their life cycle. ~~are identified within SAICM and updated every [xx] years.~~

Target A.1 bis Implementation of the national plans are reviewed by the SAICM Multistakeholder committees every 3 years.

~~**Target A.1.alt** Measures needed to be implemented to achieve sound management of chemicals throughout their life cycle are identified within SAICM and updated every xx years.~~

Target A.2 By [xx], effective actions, captured by indicators, to prevent or eliminate harm from [xx number] specific chemicals of particular concern¹ throughout their life cycle, including ~~and in waste~~, are identified and implemented by governments and non-governmental stakeholders.¹

¹ Chemicals covered by the Issues of Concern, including nanoforms, and for the Issue of Concern Chemicals in Products, chemicals with the intrinsic hazard properties listed in the Chemical Scope of the Chemicals in Products Programme, page 9.

Target A.3 By [xx], **effective actions, captured by indicators, measures identified** to prevent or **minimize eliminate** harm from chemicals throughout their life cycle {and waste}, are implemented and enforced by governments.

Target A.4 By [xx], **effective actions measures identified** to prevent or, **minimize eliminate** harm from chemicals throughout their life cycle {and waste}, are **identified** and implemented by companies.

Target A.5 By [xx], Countries make and meet their commitments and obligations under the provisions of chemicals and waste-related multilateral environmental agreements, as well as health, labour and other relevant instruments.

Target A.6 By 2030, all chemicals, or groups of chemicals, of global concern², are phased out or effectively restricted at the national, regional and global level, throughout the entire life cycle, including in products and waste, so that exposure of humans and the environment is prevented or restricted.

Target A.7 By 2030, the use of Highly Hazardous Pesticides is eliminated from agriculture.

Target A.8 By 2030, all vulnerable groups are protected from the adverse impacts of chemicals and waste

² Chemicals regulated by the Basel, Minamata and Stockholm Conventions, the Montreal Protocol of the Vienna Convention, the IARC list of carcinogens, and relevant regional regulations, e.g. the EU Restriction of Hazardous Substances (RoHS) Directive and Substances of Very High Concern (SVHC), as defined in article 59 of the EU REACH regulation. Complementary criteria for chemicals of concern should also be developed, as the listed multilateral agreements fail to capture dispersal of chemicals of concern in multi-national supply chains, trans-generational and cocktail effects, etc.

PART (ii) Provide feedback on existing text for targets under **Strategic Objective B**

**please try to insert comments in revisions mode below*

We offer these suggestions for improved targets, because the existing targets are inadequate as they do not measure “impact” and place too much emphasis on “process”, a weakness that was specifically identified in the Evaluation of SAICM from 2006 to 2015.

We also provide alternative text, because it is based on a proposal that was shared with the co-chairs of the working groups for Issues of Concern (group C) as well as Targets, Indicators and Milestones (group A) already in connection with IP3, but was not reflected in the compilation document.

At IP3, when some targets were moved from the C working group to A, our proposal that was originally raised in working group C was lost.

We have raised this issue with the Secretariat earlier.

Upon request, we can show you emails as proof of our written submission and communication about this in connection with IP3.

We kindly again ask you to include our proposal, since our targets capture a much-needed focused ambition level for key issues to address, which we believe the current suggested targets are missing.

In Annex A, you will find a more detailed outline of our suggested targets and examples of indicators that could be used together with them, as well as the rationale behind the suggested targets. A logical chronological set of indicators (and milestones if such will be formulated) can be linked to our targets, to capture successively increased ambition levels.

Strategic Objective B: Comprehensive and sufficient knowledge, data and information are generated, available and accessible to all to enable informed decisions and actions.

Considerations: Intended to address the need for new information and data to be generated to address gaps and for greater transparency and accessibility, as well as to address the need for training and education to protect all levels of society.

Target B.1 By 2030, comprehensive **gender-disaggregated** data and information on chemicals throughout their lifecycle, **including GHS formatted information on their properties and hazards, and safer alternatives** on the ~~global~~ market, are generated, made available and accessible ~~{are shared}~~ **to all stakeholders within and outside supply chains.**

Target B.2 By 2030, full GHS is adopted by all countries, and updated as new versions are published, and the information on chemical classification and labelling is freely accessible to all.

Target B.3 By 2026, a global minimum cross-sectoral transparency standard for chemicals of global concern³ is in place and used to support the work on Chemicals in Products internationally and in national implementation plans, as well as the transition to non-toxic materials flows, e.g. via circular economy.

Target B.4 By 2030, a publicly available global database administrated by UNEP for chemicals of global concern is in place to support informed decision-making, and it will expand over time as needed, when increasingly more countries report to it.

Target B.5 By 2025, information on HHPs produced, imported, exported and used is available to all stakeholders.

Target B.6 By 2030, information on nonchemical alternatives to HHPs and especially agroecological approaches is made available to farmers.

Target B.27 By 2025, all stakeholders and governments have and are using the most appropriate and standardized tools, guidelines and best available practices for assessments, including of burden-of-disease and cost-of-inaction and sound management, as well as for the prevention of harm, generic risk reduction, monitoring and enforcement of sound management of chemicals and waste.

~~**Target B.3** Information and standardized methods are available and used to understand the impacts of chemicals and waste for improved burden of disease and cost of inaction estimates, to inform the advancement of chemical safety measures and to measure progress towards reducing those impacts.~~

~~**Alt. in the meeting documents SAICM/IP.4/3** Target B.3 By 20xx, stakeholders have put in place mechanisms to access information and standardized methods to assess, reduce and prevent health impacts at all stages of the chemical life cycle.~~

Target B.8 By 20XX, gender-responsive educational, training and public awareness programmes on chemical safety, sustainability and safer alternatives have been developed and implemented.

³ Chemicals regulated by the Basel, Minamata and Stockholm Conventions, the Montreal Protocol of the Vienna Convention, the IARC list of carcinogens, and relevant regional regulations, e.g. the EU Restriction of Hazardous Substances (RoHS) Directive and Substances of Very High Concern (SVHC), as defined in article 59 of the EU REACH regulation. Complementary criteria for chemicals of concern should also be developed, as the listed multilateral agreements fail to capture dispersal of chemicals of concern in multi-national supply chains, trans-generational and cocktail effects, etc.

