

To the Swiss Federal Office for the Environment in Bern

Michel Tschirren

Dear Michel,

Thank you for the initiative to coordinate the drafting of a proposal for an SPI UNEA resolution, presented at the 8th Annual Subcommittee meeting of the Committee of Permanent Representatives, and for the opportunity to give feedback.

We see that the draft proposal has already captured many priorities noted by "a group of NGOs" in the intersessional process in connection with the SPI discussions. Nonetheless, we have a couple of questions and a few suggestions for additions:

- The draft proposal mentions only sustainable chemistry as a solution to "prevent the adverse effects of pollution and human exposure to harmful substances." However, we believe the resolution should also note Green Chemistry. It is a long-established concept with clear criteria for avoiding the generation of hazardous chemicals and unnecessary rest products from chemical reactions.
- Sustainable chemistry to us is a rather vague concept, with many alternative interpretations. What was the definition of sustainable chemistry applied for the draft resolution?
- It would be important if a draft resolution includes suggestions for setting up long-standing panels for key topics where scientific advice for policymaking will be frequent for the foreseeable future. Such issues could, among other things, include Issues of Concern in the SAICM successor, safe substitutions and non-chemical alternatives, circular economy as an essential strategy for fulfilling many SDG targets.
- The draft resolution should address gender-disaggregated data and gender-specific hazards in chemicals and waste management. While the draft proposal notes that the panel should ensure gender balance and be "interdisciplinary in nature," no explanation is provided about the importance of considering gender-dependent hazards to ensure better recommendations for protective and preventive measures. Thus, In point II of the key functions of the SPI, we suggest adding: "... undertake assessments on the nature and scale of particular issues, **including gender-disaggregated data**, how they may evolve in future, and to generate outputs that inform all actors, ...".
- The resolution should stress that the scope of data sources for review by the SPI scientists is broad. The SPI should establish a format for the systematic consideration of data/knowledge from local and indigenous communities and non-governmental organizations. Such data/knowledge may warrant and inform the collection of

- additional data according to scientifically and statistically valid methods, preventive and protective decisions, in line with the precautionary principle.
- The resolution should be more precise on securing that the SPI scientists have no political, commercial, or economic interests. There must be a strong no-interest conflict policy in the scientists' ToRs. In addition, it is crucial to establish a mechanism that can reject scientists if an apparent or potential conflict of interest is detected. Ideally, an advisory group, entirely independent of governments, should be mandated with the final word in case of such conflicts. That would secure the highest level of credibility of the SPI.

Thank you for considering the comments provided here. We are happy to clarify our standpoints, if necessary, and to continue the dialogue with you on the SPI.

With best regards,

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on behalf of

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