

To Co-chairs of
Intersessional Process on SAICM
and the sound management of chemicals and waste beyond 2020

and

the SAICM secretariat

6 July 2017

Dear Madame Co-chair, dear Mr. Co-chair, appreciated SAICM colleagues,

CropLife welcomes very much the opportunity to comment and build on the very well prepared co-chair's summary of the first intersessional meeting in Brasilia earlier this year.

Please find in the following our comments mainly relating to the topic of GOVERNANCE:

- CropLife would encourage broader participation by other UN bodies such as the FAO particularly when topics relating to pesticide management and more generally 'agriculture' are being discussed. The WHO/FAO Joint Meeting of Pesticide Management is closely involved in the EPI Highly Hazardous Pesticides and its management. The JMPM is also currently discussing criteria for measuring progress on HHP management as well has provided the definition for what an HHP by the respective guideline finalized May 2016. Having FAO more closely involved in the SAICM processes would help to avoid duplication of efforts and increase transparency on the activities taken by other important stakeholders, many of which are actively supported by industry.
- In this respect the recent meeting facilitated by the SAICM secretariat provided a beneficial platform for a first mutual information exchange on ongoing activities by key stakeholders. CropLife would appreciate to have such opportunities more often in the future as they could improve progress with the management of certain EPI's.
- In addition, the updated SAICM webpage should provide the today missing platform for each stakeholder to document their efforts in relation to certain EPI's. This would ultimately lead to increased transparency and trust.
- This transparency is necessary to achieve. It could help to avoid or at least mitigate the somewhat unproductive allegations by certain stakeholders against industry in plenary for not making progress in relation to EPI's, particularly Highly Hazardous Pesticides. This was obviously the case at the intersessional meeting in Brasilia where certain NGO's took the opportunity to portray HHPs as an issue that has made the least progress. A SAICM sponsored survey of governments and stakeholders found the opposite where HHPs ranked highest among all emerging policy issues in terms of success for integration into policy activities (see also the respective CropLife intervention).
- In relation to Highly Hazardous Pesticides CropLife International would support broader industry participation at relevant SAICM events. CropLife represents the research based crop protection industry globally. The generic industry represented e.g. by the AgroCare association that often has a significant market share in low income countries or countries

with economies in transition to our current knowledge is not yet a stakeholder to the HHP policy issue under the frame of SAICM. Also, the WHO/FAO JMPM at its recent meeting in Delhi has raised this concern.

- On a final note, CropLife International would like to reaffirm its commitment to the voluntary nature of SAICM. This process offers a flexible and effective framework for multi stakeholder and cross sectorial engagement for chemical management.

We trust you will find our comments useful and are looking forward working with you for the success of the SAICM initiative by 2020 and beyond.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Neumann', enclosed in a thin black rectangular border.

Dr. Christoph Neumann
Director, International Regulatory Policy