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We recognize that it is very important that the successor to SAICM post 2020 supports the Agenda 2030 in the best possible way, as well as puts even stronger focus on the 11 basic elements of sound chemicals and waste management according to SAICM's Overall Orientation and Guidance (OOG). We support the development of complementary targets to the already existing Agenda 2030 targets, with specific reference to the goals where SAICM clearly supports the Agenda 2030. Furthermore, we think that targets for the 11 basic OOG elements should be developed. A standardized reporting scheme and requirements in relation to the targets should be established.

The above was raised by SAICM stakeholders, or briefly touched upon, at the first intersessional meeting. We also want to highlight two additional things that have not been discussed.

Chemicals in products (CiP) has been an emerging policy issue in the SAICM work since 2009. Repeatedly, studies by various stakeholders show that hazardous chemicals are found in consumer products all over the world. The root cause of this problem is non-transparency between stakeholders in supply chains. In connection with IICM4, the CiP Programme was launched, to provide guidance for fostering transparency in supply chains. So far, only one private sector organization has registered to the programmeⁱ. We recognize the importance of the CiP Programme up to 2020, but strongly believe that it is necessary to take the work with CiP to a new level in the successor to SAICM post 2020, as a purely voluntary framework will not safeguard sufficient information sharing on chemicals in products among stakeholders.

We live in a globalized economy. This implies that any hazardous chemical not disclosed by a stakeholder in a supply chain potentially becomes a global issue, with widespread impacts. Hazardous chemicals in products is not a local issue, rather a global. There is also an aspect of justice linked to it. Some low income regions, such as Africa, are net importers of products and completely dependent on the good will of the exporters to disclose the presence of hazardous chemicals in the products. In the objectives of the CiP Programme it says "Information on chemicals relating to the health and safety of humans and the environment should not be regarded as confidential"ⁱⁱ. Chemicals that are mutagenic, carcinogenic, toxic to reproduction (CMR), endocrine disruptors (EDCs), neurotoxic, persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) may have serious and often irreversible effects on human health and the environment, yet only a few of them are currently regulated or banned under the Stockholm and Minamata Conventions.

So, which are the chemicals that are not yet regulated or banned, but ought to be?

A prominent tool for identifying them is the SIN listⁱⁱⁱ, and the Clean Production Action's GreenScreen List Translator^{iv} can also be helpful. When it comes to EDCs specifically, the UNEP/UN Environment reports on EDCs^v and the Endocrine Disruption Exchange list of potential EDC^{vi} are relevant.

Consequently, there is no need to reinvent the wheel; we can just adopt already existing data and classifications.

The presence of chemicals with the above mentioned qualities in products should not be allowed to be referred to as intellectual properties by companies. In fact, chemicals with

- potentially serious impacts on human health and the environment, and
- global transport and distribution in products.

warrant global action and regulation or bans.

We therefore urge the SAICM stakeholders to seriously consider exploring the possibility of creating **a post 2020 framework with a legally binding component on full transparency of the contents of chemicals of very high concern, especially those currently not regulated/banned by any international convention, in all constituent components of products.** This information could, e.g., be contained in a chip in each component and easily retrieved by scanning. Most of the costs for establishing such a system will be on high and middle income countries that are net producers of products. But everyone, not the least net importer countries, gain from full transparency. It will be easier for importers and exporters to secure compliance with national regulations, substitution work will be simplified, and materials not suitable for recycling due to their content of hazardous chemicals can be separated, and terminal waste treated safely and properly. **We suggest that the SAICM stakeholders take a decision at the next intersessional meeting to commission a legal consultant to investigate how a post 2020 legally binding successor to SAICM , that builds on the existing voluntary regime can be constructed.** This would add flexibility and a whole new dynamics and significance to SAICM post 2020.

We also suggest that the SAICM stakeholders take a decision at the next intersessional meeting to commission a consultant to investigate how chemicals that should be subject to legally binding rules on transparency are best identified, based on preexisting lists for chemicals of very high concern.

We strongly believe that CiP is mature enough of being elevated into a legally binding component, not the least because transparency is key for a safe circular economy, and a circular economy will be an important strategy to facilitate fulfillment of a number of targets to the Sustainable Development Goals of the Agenda 2030.

Target 8:4 directly refers to circular economy, and there are clear linkages to several other targets (3:9; 6:3; several targets to goal 8, referring to providing jobs; 11:6; 12:2; 12:4; 12:5; 14:1; 15:1 and 15:6).

With a circular economy we can:

- Save raw materials;
- Save water;
- Save processing chemicals;
- Save energy;
- Prevent creation of waste needed to be landfilled or incinerated; and
- Potentially creates new jobs.

There are already large informal partially circular economies in many low and middle income countries. They support many poor people. It is hard as it is to secure safe working conditions in the informal sectors, and non-transparency of the chemicals contents in products means that many

materials handled by informal recyclers potentially contain chemicals hazardous to their health and to the environment. This is a serious issue that further adds to the need for global action to elevate the work with CiP into a legally binding component.

As far as we know, at the first intersessional meeting for the post 2020 process no SAICM stakeholder specifically raised CiP in this holistic, truly life cycle perspective, in relation to a circular economy and its importance for the realization of the Agenda 2030. We want to be clear, specific and concrete already at this early stage in the discussions on the successor to SAICM post 2020. **Elevating the CiP work into a legally binding component, requiring full transparency of the contents of chemicals of very high concern in all constituent components of products, in the successor to SAICM post 2020, and highlight its crucial importance for a safe circular economy, necessary for fulfillment of the Agenda 2030, would substantiate the function of the SAICM post 2020 framework for sustainable development in a very concrete way.**

Consequently, we kindly request the SAICM secretariat to include our input to the document to be further discussed at the second intersessional meeting 2018.

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ⁱ<http://www.unep.org/chemicalsandwaste/what-we-do/science-and-risk/chemicals-products/cip-programme-participating-stakeholders>

ⁱⁱChemicals in Products Programme, page 8.
(file:///C:/Users/hemdator/AppData/Local/Microsoft/Windows/INetCache/IE/2GY1YBOB/CiP%20programme%20October2015_Final.pdf)

ⁱⁱⁱ<http://sinlist.chemsec.org/>

^{iv}<https://www.greenscreenchemicals.org/learn/greenscreen-list-translator>

^v<http://www.unep.org/chemicalsandwaste/what-we-do/science-and-risk/endocrine-disrupting-chemicals>

^{vi} <https://endocrinedisruption.org/interactive-tools/tedx-list-of-potential-endocrine-disruptors/search-the-tedx-list>