

**Submission to SAICM IP3 discussions,
United Nations Special Rapporteur on human rights and hazardous substances and wastes,
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Thank you for the opportunity to comment on the co-chair's paper for a successor to the current Strategic Approach to International Chemicals Management (SAICM). I would like to briefly comment on a few points.

Review mechanism

It is vital that the successor to SAICM clearly and regularly demonstrates its impact at the national level to ensure the continued interest in and legitimacy of investments in global initiatives.

The current co-chair's paper completely lacks an effective review mechanism. States have pledged repeatedly to achieve the undefined concept of "sound management of chemicals" through successive declarations and pledges. The Overall Orientation and Guidance and its "11 basic elements" is the closest SAICM has come to a meaningful definition, which should frame and orient future reviews of national efforts.

Indeed, several countries have taken steps to implement the 11 basic elements of sound chemicals management since 2006. However, efforts in many countries has either stalled or regressed – and any progress achieved was almost never a result of SAICM. During my official and unofficial visit to countries of varying levels of development in the past five years, not one country has mentioned what it is doing as a consequence of SAICM to achieve sound chemicals management.

The inclusion of mechanism to review and comment on each States progress toward the 11 basic elements of sound chemicals management would not only incentivize reporting, but also create a positive incentive for countries to make and demonstrate progress. It could also creating new avenues for multi-stakeholder and multisectoral participation. For more information on one example of such a review mechanism, I refer you to my 2018 report to the UN General Assembly, section C, available here in all UN languages:

http://ap.ohchr.org/documents/dpage_e.aspx?si=A/73/567

Financial mechanism

Although SAICM has the broadest mandate on chemicals and waste cluster, it is plagued by the least resources of any agreement in the cluster. This is not an accident. Mobilizing significant financial resources, in particular new and additional financial resources, greatly benefits from legally-binding obligations.

In addition to the lack of commitment by low- and middle-income countries that would hinder new and additional funding by Governmental donors, the proposal that the private sector directly or indirectly contributes funding under a voluntary framework raises concerns regarding both the integrity and sustainability of the successor to SACIM. To mobilize private sector contributions, which are correctly pointed out as both lacking and warranted, but without compromising the integrity of future international efforts on chemicals, States should be required to collect fees nationally that would then be contributed to SAICM. This would likely require an obligation by some or all States under SAICM, questioning the validity of a purely voluntary effort.

The name of SAICM

The name of the successor of SAICM cannot be understated regarding its importance, and the existing name is problematic in terms of raising the profile of chemicals and wastes.

The concept of 'sound chemicals management' discourages interest and engagement in the topic of chemicals and health. In my view, people seem to care about their wellness and wildlife, rather than the off-putting terms like "management" and "chemicals." The sustainability and/or environmental policies of various business enterprises reflects this reality.

If one of the main objectives of SAICM's successor is to raise awareness and thus the priority of chemicals and wastes publicly and politically, then I would suggest that a better name and framing is required. Investments have already been made by various actors in communication research to better understand what resonates with the public when it comes to chemicals and waste issues. I would be happy to see if these studies could be made available to inform whether a better name than the "Strategic Approach to International Chemicals Management" could be developed.