

Japan's comments on co-chair's draft papers on SAICM intersessional process

As per the request for comments to the draft papers on intersessional works from SAICM secretariat dated on 12 July 2019, Japan would like to submit our comments as follows:

SAICM/ICCM.5/Bureau.7/4.1 - Other mechanisms to support implementation

Japan expects that the next framework should widely adapt active engagement by stakeholders that can express their commitments and contribute proactively to the sound management of chemicals and waste in various angles. We hope that the new framework will provide an effective platform to propose activities, enhance collaborations, develop projects, and other forward-looking discussions among stakeholders. In this context, the progress management and evaluation framework should be less normative but address such direction to acknowledge the committed results by the stakeholders. In addition, the indicators that will be developed together with the post SAICM targets should include process indicators that reflect such concept.

As the WSSD 2020 will be elapsed, new framework should be aligned the SDGs as much as possible. The evaluation of the effectiveness should be thus synchronized with the ones for the SDGs. In particular, SDGs goal 12.4 should be appropriately realigned with the new framework. The indicators for goal 12.4 could become the outcome indicators for the new framework.

Proposed text on reporting process indicates several timeframes, e.g., 4 years, 10 years. Those process should be harmonized (e.g., 12 years or other interval instead of 10 years), so that the reviewing of the progress could be undertaken efficiently without imposing too much burden on the respondents.

Although it is important to assess the progress of the implementation by stakeholders' reports, we have already known of the existing challenge that the submission rate of reports is much lower than anticipated (e.g., 54 out of 175 countries submitted the report of 2014-2016 review period). Therefore, we should examine the cause of this low reporting rate in detail and consider an appropriate way for raising the reporting rate while reflecting the way to report or a template for reporting. In doing so, we could realize if agreed ambitious targets or practical frameworks are achieved or work well.

In addition, the progress review periods should be pre-determined, so that each stakeholder could well prepare its progress report.

It seems that the term 'target' in the document are not fully defined as various 'targets' are found. Definitions of 'target', 'key target', 'voluntary established target', 'sector specific target', etc. should be included in the text.

Capacity-building is one of the important measures for supporting progress of sound management of chemicals and waste. Japan believes that the mode of capacity-building activities are diverse, including bilateral or multilateral cooperation, in-kind or cash contribution, investment or human resource development, etc. New framework should accommodate a mechanism to report such measures, so that both contributors and their activities will be well acknowledged.

SAICM/ICCM.5/Bureau.7/4.2 - Additional measures to achieve multisectoral engagement

Japan believes the voluntary nature of the SAICM is the key for the next framework of the sound management of the chemicals and waste beyond 2020. The mechanism to promote proactive actions and contributions should be considered instead of too much obligatory and punitive aspects. Forward-looking constructive discussions to involve industrial sectors to the next framework including partnership arrangement etc. should be considered. Thus, Japan concurs the proposed text on implementation and monitoring that the commitment milestones or pledges under strategic objectives are established and monitored.

Science-based policy making is another important aspects that the next framework should consider. Strong data collection and analysis mechanism are necessary, thus the engagement of academia should be explored. It should be highlighted; however, such engagement should not lead to the establishment of new permanent institution such as inter-governmental scientific panel. Instead, more flexible arrangement to invite scientific inputs from competent institutions/experts should be explored.

The draft text provides comprehensive suggested actions by different stakeholders, but some of the suggested actions are not easily imaginable. The 'regional action plans' indicated in the Regional Collaboration needs further clarification if it has a firm basis (e.g. good precedence) or purely author's creation.

SAICM/ICCM.5/Bureau.7/4.3 - Addressing issues of concern

The co-chairs' paper suggests more systematic approach to identify and implement issues of concern under new framework. Japan appreciate and concur the suggested approach in principle, especially, the need to make a distinction between capacity building issues and issues require collective international actions. It is also important to identify champions or stewards responsible for guiding progress. It could be IOMC organizations or other voluntary bodies that commit such role for respective issues.

Criteria for completion/sun setting an issue is another important aspect for proper management of the issues of concern. Termination of an issue should happen in various reasons. In addition to the successful completion, change in priority, loss of interest of stakeholders, withdrawal of champion organizations, taken over by legally-bound instruments (e.g. conventions), etc.

The proposed text on mechanisms for adoption of issues of concern and for monitoring their progress (page2) indicates a 'governing body,' that has a decision-making function. The text should be further clarified the term 'governing body' if it expects the ICCM itself, delegating to a subsidiary body under ICCM, secretariat, or other arrangement. On top of that, the detailed process of the decision making should be discussed.

SAICM/ICCM.5/Bureau.7/4.4 - 'Principles and Approaches' set out in document SAICM/OEWG3.3/4

As recommended by the Co-chairs, the list of principles and approaches should be limited to the global declarations and agreements relevant to sound management of chemicals and wastes. Japan believes that current draft sufficiently covered the major declarations and agreements.

SAICM/ICCM.5/Bureau.7/5 - Draft outline for the secretariat review of successful mechanisms for cost recovery and implementation of the polluter pays principle

The SAICM evaluation indicates the insufficient involvement of industrial sectors, but it is partially due to the insufficient monitoring mechanism to collect information on industrial involvement. For acknowledging the activity and contribution, appropriate indicators should be established in the new evaluation framework.

Japan sees that the effective use of existing mechanisms should be considered as much as practicable before establishing another new mechanism. The integrated approach to financing for the sound management of chemicals and waste were adopted in 2013, but little progress has been made on taking forward the mainstreaming, which is the role of each country in its governing system, and the industry involvement, which includes private sector investments. For enhancing the private sector's investment, virtuous win-win approach for both developing countries and private sectors should be explored.