

**Comments from the United States of America
on the
Proposal on objectives in support of the 2030 Agenda and related milestones**

November 27, 2017

The United States agrees that it is critical to develop objectives and milestones for a future approach to chemicals (and potentially waste) management, and we believe this document is a useful starting point for this process. We are especially appreciative that this proposal is based on the 11 basic elements already agreed under the auspices of the OOG. Our specific comments and suggestions for improving on this initial draft are included in the below list.

Overall Comments

- We believe that some of the objectives laid out here are too rigid and should be made more flexible, and therefore achievable (see comments below). Objectives that are too prescriptive may be in conflict with the provisions of existing domestic legislation. The 11 basic elements described in the OOG are helpful in that they provide a framework for the development of chemicals management programs while allowing countries and stakeholders the ability to tailor implementation to national circumstances.
- The objectives should be modified to reflect actions by a range of stakeholders, not just governments. A number of the sub-objectives currently focused on country actions could be broadened to include a stakeholder role. Examples include sub-objectives 4a, 4b, 7a, 7b, 8a, 8b, 9a, 9b, 10a, 10b, and 11b.
- Stakeholders have not yet agreed if and how waste should be included in a future approach, and these objectives will need to be updated once there is agreement on this topic.
- It is not clear to us what is meant by using this document as a template for an action plan/ roadmap along the lines of the GPA. We would note that the GPA was never agreed and was very difficult to negotiate, so we caution against the development of a prescriptive policy roadmap.
- It is inappropriate for this document to suggest timeframes and indicators for implementation of objectives – this is a decision that should be made by SAICM stakeholders once objectives are agreed.

Specific Comments on Draft Objectives

We will likely have additional comments on specific objectives as this process evolves, but these are our initial reactions:

- It is not clear to us what is meant by “other relevant transport and pollution agreements” referenced in objective 3e.

- Objective 5b should be revised to reflect the primary role of governments in developing and implementing legal requirements for sound chemicals and waste management, while engaging stakeholders in the process.
- Objective 5c. Should include reference to “occupational exposure” and encourage the collection of information on the life-cycle of chemicals.
- The role of stakeholders in providing data and information on chemicals and waste throughout the lifecycle should also be included in Objective 7a. Likewise, stakeholders also have a role in supporting and participating in the implementation of GHS, where relevant.
- Objective 8a should reference the legislative/policy framework for the sound management of chemicals and wastes (1a) and the technical infrastructure needed to support the life-cycle management of chemicals (4a) using best practices.
- Objective 9c: This objective seems to fit better under objective 8, Risk Reduction.
- We believe that objective 10a should be edited to reference “resource efficiency,” rather than “circularity,” because this is the agreed term used by the international community. We also do not support the emphasis on substitution in this objective, and we would note that there are no such things as “non-hazardous chemicals” and “non-chemicals solutions”: everything is made of chemicals, and all chemicals can be hazardous depending on human exposure levels.
- Objective 11b references the costs of inaction. We believe this reference should be removed because rigorous data on these costs is lacking.
- Objective 11c calls for new partnerships and linkages. We do not support the creation of new structures or partnerships.

Linkages to the 2030 Agenda

We have reviewed the mapping of objectives and milestones to specific SDG targets, and we believe this structure is useful because it offers suggestions regarding how objectives contribute to SDG implementation without prescribing how countries should implement the SDGs. However, we believe the details of the map should be put to the side for now and revisited once the objectives and scope of a future approach are agreed. We would also note that many of the Agenda 2030 goals and targets are likely to be relevant for any proposed objective, so it may be helpful to include a list of such overarching linkages, as well as linkages between specific objectives and particular goals/targets.

Linkages to the International Health Regulations

We support the linkage of this work to the ongoing effort to achieve the critical capacities, including those related to chemical events, set out in the IHRs, a binding all-hazards preparedness agreement among all members of the WHO. Building on this, we believe there is an opportunity to leverage the IHR Joint External Evaluations, a voluntary external assessment

of country capacity, and the follow-on country planning efforts, to further strengthen country-level capacity building efforts related to SAICM.

Working Group

Finally, this document mentions that it was agreed at the Brasilia meeting that an intersessional working group would be established to create this milestones document. Has that group been formed, or is this call for comment intended to form the group? We would ask that Kate Weber (WeberKP@state.gov) and Laura Nazef (Nazef.laura@epa.gov) be added to any future mailing list for an intersessional working group.