

World Health Organization comments on SAICM Secretariat DRAFT Proposal on objectives in support of the 2030 Agenda and related milestones

Background

1. At the first meeting of the intersessional process considering the Strategic Approach and the sound management of chemicals and waste beyond 2020 (Brasilia, Brazil, 7-9 February 2017), participants agreed that the SAICM secretariat, in consultation with the Bureau of the International Conference on Chemicals Management (ICCM), would produce a document as follows:

In line with paragraph 10 of resolution IV/4 and in consultation with relevant stakeholders, a proposal on objectives in support of the 2030 Agenda and related milestones, with the objectives to be aspirational in nature, limited in number and centred on the 11 elements of the Overall Orientation and Guidance and the paper to be developed through an intersessional working group open to all stakeholders

2. The ICCM Bureau has invited comments on the SAICM Secretariat's DRAFT Proposal on objectives in support of the 2030 Agenda and related milestones¹ by 1 December.

WHO comments

3. The World Health Organization has considered the Draft proposal in light of the WHO Road map to enhance health sector engagement in SAICM towards the 2020 goal and beyond, which was approved by the 70th World Health Assembly in May 2017.
4. SAICM's 11 basic elements were designed address what is critical at the national/regional level in the timeframe to 2020. The WHO Road map has a longer timeframe and is broader in scope, which is relevant to setting objectives beyond 2020. While the Road map is constructed differently (Outcome Statements, Action Areas and Activities) the comparison aims to identify any key areas of work by the health sector that are not covered by the SAICM Draft objectives.
5. Road map actions that are missing and do not easily fit under the 11 objectives:
 - a) Some of the more specific road map actions aren't included such as phasing out lead in paint or actions on healthy health care settings. Countries may wish to consider a few very specific targets to work towards.
 - b) Filling knowledge gaps is only covered in relation to alternatives (see 10a & b). It is not easy to see where more general filling knowledge gaps would fit within the 11 objectives.
 - c) Environmental and human monitoring programmes are missing from the milestones and objectives. It's hard to see where this would fit under the 11 objectives – unless it is considered 'monitoring impacts' under objective 9.
 - d) Countries/organizations establishing their own indicators (aligned with regional, international indicators where possible). This does not fit under the current proposed structure.

¹ <http://www.saicm.org/About/Bureau/Bureaumeetings/tabid/5949/language/en-US/Default.aspx>

- e) Training and education is completely missing – this could cover training medical workers, as well as integrating safer chemical design considerations into academic programmes.
 - f) Improving the balance of multi-sectoral representation in the beyond 2020 forum (whatever it becomes). A future version of the SAICM proposal should include objectives at the international level.
6. WHO Road map actions that are missing but could be considered to fit within the 11 objectives:
- a) Awareness raising/risk communications could be considered a ‘best practice’ for risk reduction and included under objective 8.
 - b) Setting priorities (not just dealing with them as per 9b) based on an understanding/analysis/identification of vulnerable populations (and ecosystems), and exposures and releases of concern. This could be considered a ‘best practice’ for risk reduction and included under objective 8.
 - c) Vulnerable populations writ large are not well covered. The only place this is mentioned is under 9a about monitoring impacts. This should at least be mentioned as well under objective 8 on risk assessment and risk reduction.
 - d) Method development is related to best practices so could be included under Objective 8.
 - e) Establishing (Health based) guidelines for water, air, soil, food, products, occupational exposure could be included under Objective 8 about risk reduction or Objective 1 on policy and legal frameworks.
 - f) Primary/basic data collection – e.g. civil registrations and vital statistics, documenting cases of chemicals causing harm/death as well as toxicosurveillance/vigilance. This is covered by 9a but it warrants highlighting as “collecting data on the impacts” could be interpreted as laboratory toxicity studies.
 - g) Laboratory capacity is not specifically mentioned though could be implied through implementation of multilateral environment agreements and the International Health Regulations (IHR)(2005). It could also be specifically included under Objective 6.
7. Objective/s should be included to support implementation, including:
- a) The development by sectors (e.g. agriculture, environment and labour) of road maps or plans to support implementation, as has been done by WHO for the health sector. It is important that environment engages as a sector, to clearly signal equal partnership among the sectors and to avoid the perception that the beyond 2020 framework is “owned” by the environment sector and the other sectors “contribute”.
 - b) An objective of balanced sectoral representation in the beyond 2020 forum (as mentioned above in 5. F)), including specific targets.
8. Additional more detailed WHO comments on the draft proposal are presented in Annex 1.

Additional WHO comments on Proposal on objectives in support of the 2030 Agenda and related milestones (version 23 October 2017)

Key Area I: Legal frameworks, implementation and enforcement

Objective 1: Legal frameworks that address the life-cycle of chemicals and waste

- 1a. Countries have basic policies and legislation in place to manage chemicals and waste throughout the life-cycle.
- 1b. Countries have developed and are implementing mechanisms to review, update, and strengthen their policy, legislative and regulatory frameworks in light of national priorities and international commitments.

Objective 2: Relevant enforcement and compliance mechanisms

- 2a. Countries have functional chemicals and waste enforcement and compliance mechanisms in place.
- 2b. Countries have developed and are implementing procedures to review, update, and strengthen their chemicals and waste enforcement and compliance mechanisms.

WHO comments

Objectives 1 and 2 should be combined because compliance and enforcement should be part of basic legislation.

Objectives could then be centred on (with corresponding milestones):

- (1) Basic policies and legislation –ultimately this will need to be defined.*
- (2) Programme and infrastructure to implement the policies and legislation. (Would replace Objective 4 below)*

Objective 3: Implementation of chemicals and waste-related multilateral environmental agreements, as well as health, labour and other relevant conventions and voluntary mechanisms

- 3a. Countries are implementing their obligations under the chemicals and waste-related multilateral environmental agreements.
- 3b. Countries are implementing the relevant provisions of the International Health Regulations (2005) (IHR).
- 3c. Countries are implementing relevant ILO Conventions, Protocols, Codes of Practice, and Recommendations.
- 3d. Countries are implementing the FAO/WHO International Code of Conduct on Pesticide Management and relevant technical guidelines.
- 3e. Countries are implementing other relevant transport and pollution agreements.

Key Area 2: Institutional frameworks, stakeholder participation, and sectoral engagement

Objective 4: Strong institutional frameworks and coordination mechanisms among relevant stakeholders

- 4a. Countries have developed administrative, regulatory, and technical infrastructures to manage chemicals and waste throughout the life-cycle, including those aimed at preventing illegal traffic in chemicals and wastes.
- 4b. Countries have developed and are implementing comprehensive and inclusive stakeholder and sectoral engagement plans/platforms, as well as active coordination and networking mechanisms.

Objective 5: Industry participation and defined responsibility across the life cycle

- 5a. Industries, including primary producers, downstream companies, distributors and vendors, are incorporating sound chemicals and waste management into corporate policies and practices, and reporting on that incorporation, including via sustainability reporting.
- 5b. Industries work in partnership with government and other stakeholders in developing and implementing legal requirements for sound chemicals and waste management throughout the life-cycle.
- 5c. Industries work in partnership with government and other stakeholders to implement cost recovery policies and systems, risk reduction measures, and innovative approaches to sound chemicals and waste management throughout the life-cycle.

WHO Comments *The following should be added:*

- providing information on chemicals in products throughout their lifecycle

- occupational exposure

Objective 6: Strengthened capacity to prepare for and respond to chemicals accidents, including institutional-strengthening for poison centres

- 6a. Countries have formalised and/or strengthened legal, administrative, and technical infrastructures and capacities to deal with chemical accidents, including involvement of sub-national and local authorities.
- 6b. Countries have established or strengthened poison centres and ensure access by all relevant stakeholders to poison information services.

Key Area 3: Information, risk assessment/reduction and monitoring

Objective 7: Collection and systems for the transparent sharing of relevant data and information among all relevant stakeholders using a life cycle approach

- 7a. Countries have established a system and are able to collect relevant data and information on chemicals and waste throughout the life-cycle, and are making it available to relevant stakeholders.
- 7b. Countries are implementing the GHS.

Objective 8: Chemicals risk assessment and risk reduction through the use of best practices

8a. Countries are able to undertake risk assessment and risk reduction actions.

WHO Comments It isn't clear what this means in practice. How would being "able" to do RA/RR differ from having the legislative/policy framework (1a) and the technical infrastructure (4a) to manage chemicals throughout their life-cycle. Also as worded this loses the critical aspect about the use of best practices.

8b. Countries are actively participating in networks to identify and promote best practices for risk assessment, risk reduction, and reduced-risk alternatives, taking into account the full life-cycle.

Objective 9: Monitoring and assessing the impacts of chemicals on health and the environment

9a. Countries ~~to~~ collect and consolidate data on the impacts of chemicals on human health and the environment, including to estimate, communicate, and monitor the scope and magnitude of these impacts, in particular for vulnerable populations.

Deleted: have capacity

WHO Comments This includes too many different aspects and needs to be broken down. Perhaps it could be combined with 7a and split out as follows:

Countries are:

- (1) Collecting data and information on chemicals throughout their lifecycle, including on the impacts of chemicals on human health and the environment. A fundamental component of this would be to ~~improve basic collection systems such as those to document the causes of hospital admissions and death due to chemical exposures, as well as PRTRs.~~
- (2) Consolidating and analysing data and information to identify impacts and trends, and to estimate and monitor the scope and magnitude of these impacts, including for vulnerable populations ~~where possible.~~
- (3) ~~Make the data and analysis available to relevant stakeholders.~~

Commented [WHO2]: Note: This is a WHO road map action

Commented [WHO3]: Since disaggregated data is not always available.

Commented [WHO4]: From 7a

9b. Countries are taking action ~~to reduce risks of~~ identified issues of concern, according to national priorities.

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WHO Comments This may fit better under objective 8. Further, the first step should be to set priorities and this is not captured in these milestones. Note: Setting priorities is a WHO road map action.

9c. Countries and all relevant stakeholders (governments, industry, labour unions, etc) are taking effective action to protect workers and promote safety and health at workplaces dealing with any part of the life-cycle of chemicals and wastes.

WHO Comments This would fit better under Objective 8 since it is related to risk reduction. Alternately it could be mainstreamed into other actions and avoid overlap.

Objective 10: Development and promotion of environmentally sound and safer alternatives

10a. Countries are taking steps to develop and promote innovation, circularity (design, prevention, re-use, recycling), and substitution use of non-hazardous chemicals and non-chemicals solutions).

10b. 

WHO Comments 10b is covered by 10a, and in any case it is not clear what it means for a country to have “scientific capacity to encourage research...” Countries could do research with their scientific capacity.

Deleted: Countries have scientific capacity to encourage research for and development of environmentally sound and safer alternatives.

Key Area 4: Political leadership, outreach, and promotion

Objective 11: Inclusion of the sound management of chemicals and waste in national health, labour, social, environment and economic budgeting processes and development plans

11a. Countries have included sound management of chemicals and waste in national sustainable development plans and in relevant sectoral plans and budgets (e.g. national health, labour, and social), as well as engaged the commitment of the highest possible level of policy and political officials in their development.

11b. Countries are demonstrating and communicating the economic value of sound chemicals and waste management, including the costs of inaction and/or poor management, and have launched public awareness campaigns regarding the importance of sound chemicals management.

11c. Linkages and partnerships have been established between chemicals and waste units and other relevant aspects, sectors, and stakeholders of the 2030 Agenda at the national, regional, and international levels.

Such aspirational and limited-in-number objectives as those proposed above could be part of the core beyond 2020 package. They could also be complemented with sectoral or stakeholder-specific objectives and milestones/targets. For example, linked to target 11(c) could be the WHO Chemicals Road Map target of establishing a global chemicals and health network.²

² The full action reads: “Establish a global chemicals and health network, with links to existing subregional, regional and international networks, to facilitate health sector implementation of this road map (including participation in the Strategic Approach).”