Dear SAICM Secretariat,

in preparation for the next intersessional meeting, you have asked of inputs by SAICM stakeholders. Now, we - Friends of the Earth Germany - like to mention only some of those points which are of importance for us:

- The enabling framework should have a broad scope. The exact wording – e.g. „issues of concern“ respectively „emerging issues“ – is not of importance as long as the scope stays as broad as before. The scope should not be limited to issues which are only of overall global concern.
- State Parties should develop mandatory national action plans (NAP) for risk reduction, and should participate in global periodic reviews of national efforts for ensuring chemical safety.
- Regarding the waste sector: In order to optimise waste management in a sustainable manner, it is needed to look at all kinds of waste – not only hazardous, associated waste etc..
- Transparency obligations to ensure a safe circular economy without hazardous chemicals are necessary.
- Measures are necessary which encourage stakeholders e.g. in agricultural sector as well as in the industry to use non-toxic alternatives wherever possible in order to avoid or to minimise the use of hazardous chemicals in consumer products.

We hope you will find these points useful.

Best regards

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