Virtual Working Group on Targets, Indicators, and Milestones

Input by CropLife International

CropLife International thanks the co-facilitators for the opportunity to provide comments on:

- Existing text for targets under Strategic Objective A
- Existing text for targets under Strategic Objective B

CropLife International has included the text below from the SAICM Secretariat, with comments in tracked changes

**Strategic Objective A:** [Measures are identified, implemented and enforced in order to prevent or, where not feasible, minimize harm from chemicals throughout their life cycle [and waste];]

**Considerations:** Intended to cover the need to effectively identify, select and address issues of concern that warrant global action. The intention is to cover topics similar in nature to those covered by the Strategic Approach, emerging policy issues and other issues of concern, as well as topics such as managing specific chemicals, the burden of disease and financing. There may be a need to develop and identify the criteria for issues of concern.

*CropLife International suggest A1.alt to be the preferred option, aligned with comments by other stakeholders at the first conference call, that cautioned an additional burden for many countries by the development and review of plans within SAICM. Target A1.alt Measures needed to be implemented to achieve sound management of chemicals throughout their life cycle are identified within SAICM and updated every xx years.

Target A.2 By [xx], actions to prevent harm from [xx number] specific chemicals throughout their life cycle [and waste] are identified by governments and non-governmental stakeholders.

*CropLife International suggests the deletion of this target, as focus on specific chemicals is unlikely to support the further accelerated implementation of the SAICM key objectives of chemical management.*
Target A.3 By [xx], measures identified to prevent or, minimize harm from chemicals throughout their life cycle (and waste), are implemented and enforced by governments. CropLife International supports this statement but suggests strengthening by specifying the need for chemical legislation and pesticide regulation to be implemented and/or enforced by governments.

Target A.4 By [xx], measures identified to prevent or, minimize harm from chemicals throughout their life cycle (and waste), are implemented by companies. CropLife International supports this target and suggests indicators could track compliance such as with regulations, the implementation of the International Code of Conduct on Pesticide Management by governments and adherence to its requirements by stakeholders.

Target A.5 By [xx], Countries make and meet their commitments and obligations under the provisions of chemicals and waste-related multilateral environmental agreements, as well as health, labour and other relevant instruments. CropLife International generally supports this target but more specificity is needed given its current broad scope – this can be achieved by respective indicators.

Strategic Objective B: Comprehensive and sufficient knowledge, data and information are generated, available and accessible to all to enable informed decisions and actions.

Considerations: Intended to address the need for new information and data to be generated to address gaps and for greater transparency and accessibility, as well as to address the need for training and education to protect all levels of society.

Target B.1 By 20xx, comprehensive data and information on chemicals on the global market, throughout their lifecycle, are generated, made available and accessible [are shared] this is without prejudice to the protection of Confidential Business Information as defined and provided for under relevant legal frameworks.

(Justification for insertion: The legal framework of transparency is discussed and defined in the context of the relevant national, regional or international legal frameworks which provide for the balance between access to data while protecting legitimate interests in CBI, as defined by the respective laws. The
discussions here can provide general targets but should safeguard and not interfere with these legal frameworks providing for specific definitions and provisions defining rights and obligations in this regard. While we strongly support transparency, we would like to remind that this should not be a goal in itself, but it needs to serve a purpose and the effectivity of transparency to reach that purpose should be substantiated.

Target B.3 Information and standardized methods are available and used to understand the impacts of chemicals and waste for improved burden-of-disease and cost-of-inaction estimates, to inform the advancement of chemical safety measures and to measure progress towards reducing those impacts. CropLife International prefers the alternative wording vs the original wording below.

Alt. in the meeting documents SAICM/IP.4/3 Target B.3 By 20xx, stakeholders have put in place mechanisms to access information, without prejudice to the protection of Confidential Business Information as defined and provided for under relevant legal frameworks, and standardized methods to assess, reduce and prevent manage the risk on environment and health impacts at all stages of the chemical life cycle

(Same rational as above)

Target B.4 By 20XX educational, training and public awareness programmes of risks and benefits of chemicals have been developed and implemented with a focus on chemical safety, sustainability and safer alternatives, have been developed and implemented.