

# Input to the Intersessional Process on SAICM and the sound management of chemicals and waste beyond 2020

Dear Madam/Sir,

Appended to this document are two documents initially prepared by Greenpeace for submission to the United Kingdom's Chemicals Stakeholder Forum (UKCSF) in response to an invitation to assist the establishment of UK's position on sound management of chemicals and waste beyond 2020. We have subsequently been encouraged by UKCSF to submit them directly to the SAICM secretariat as a contribution to the Intersessional Process. We hope that they may provide some useful principles and ideas to help guide the discussions on the future of SAICM beyond 2020 as they go forwards.

We have particular interest in the science-policy interface mentioned in the co-chairs' summary report. From our perspective, it will be necessary but not sufficient only to strengthen the existing scientific bodies currently advising different aspects of global chemical and waste sound management work. Just as the somewhat fragmented existing chemical and waste instruments will require an overarching framework to ensure co-ordination and to fill the gaps, so the existing relevant scientific bodies, which normally sit ONLY under, or work ONLY for, one of these existing instruments, would also benefit substantially from consolidation. We see a huge potential for greater collaboration, streamlining, or even merging of separate working groups and/or taskforces under one overarching scientific panel/body, in order to enhance the breadth and depth of strategic guidance, improve coherence and synergy, avoid duplication of work, and increase efficiency and credibility of policy decision-making on global chemical and waste work. There could also be significant financial benefits from such consolidation.

An overarching panel might also enable more timely and consistent responses within potential action areas under SAICM and beyond 2020, e.g. EPIs. We fear that the current lack of a stable, strong and credible overarching scientific body under SAICM, may well have contributed in part to the relatively slow progress on such issues. Furthermore, such a global overarching scientific body could provide the critical mass necessary in order to encourage engagement of the wider scientific community with relevant expertise on chemical and waste issues, which has not so far been mobilized as effectively as it could. By analogy, many scientists & civil society organisations around the world have been mobilized by the critical mass of the IPCC within the field of climate science. We hope the document in Annex 1 which was originally prepared for UKCSF could serve as a contribution to this broad issue.

The second annex was a very brief analysis of the correlation between SDGs and sound management of chemicals and waste beyond 2020. In our opinion, the core but not exclusive focus of the 'beyond 2020' mechanism under discussion should be on the two SDGs listed below, which are complementary to each other:

- 1) SDG 12.4 sound management of chemicals and wastes through life cycle to minimize adverse impacts on human health & environment, in accordance with agreed international frameworks. Note: 1) it's not restricted to activities by 2020 and should be extended to beyond 2020, and 2) this beyond 2020 framework under

discussion will be one of the “agreed international frameworks” to make contribution to SDGs), and

2) 12.5 waste generation reduction.

Working on Targets 12.4 & 12.5 will be dealing with the root causes for many other SDGs, e.g. 14.1 marine pollution, 3.9 death from chemicals & pollution etc.

We hope you find our submission useful.

Please feel free to get back to us if you have any questions.

With thanks and best regards,

Dr Melissa Wang  
Greenpeace Research Laboratories  
Greenpeace International

Dear Brenda, UNEP and SAICM colleagues,

Thank you very much for your hard work on the Intersessional Process on SAICM and the sound management of chemicals and waste beyond 2020.

Greenpeace has submitted to the United Kingdom's Chemicals Stakeholder Forum (UKCSF) in response to an invitation to assist the establishment of UK's position on sound management of chemicals and waste beyond 2020. We have subsequently been encouraged by UKCSF to submit them directly to the SAICM secretariat as a contribution to the Intersessional Process. We hope that they may provide some useful principles and ideas to help guide the discussions on the future of SAICM beyond 2020 as they go forwards.

In short, we see a huge potential and benefits for greater collaboration, streamlining, or even merging of separate working groups and/or taskforces under [one overarching scientific panel/body](#). It might also [enable more timely and consistent responses](#) within potential action areas under SAICM and beyond 2020. Furthermore, it could provide the critical mass necessary in order to [encourage engagement of the wider scientific community](#) with relevant expertise on chemical and waste issues, which has not so far been mobilized as effectively as it could.

On the other hand, we think the core but not exclusive focus of the 'beyond 2020' mechanism under discussion should be on the SDG 12.4 & 12.5, which are complementary to each other. Here attached you'll find the [full cover letter](#) of our submission to intersessional process, with more detailed documents on [1\) science-policy interface, and 2\) correlation between SDGs and sound management of chemicals and waste beyond 2020](#) as annex to the cover letter.

Thank you very much! And we hope you'll find the documents helpful.

Please do not hesitate to let us know if there is anything else we could be of help.

Sincerely,

Dr Melissa Wang

## UK Chemicals Stakeholder Forum

### Sub-Group on the Strategic Approach to International Chemicals Management (SAICM)

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#### Briefing document of IPCP (International Panel on Chemical Pollution) for SAICM Science-Policy Interface discussion

Submitted by Greenpeace Research Laboratories (in consultation with IPCP, [www.ipcp.ch](http://www.ipcp.ch))

#### ***Executive Summary:***

In the first SAICM intersessional meeting in Brazil from 7 to 9 February 2017, a science-policy interface has been proposed again as an important element for the realization of sound management of chemicals and waste beyond 2020.

In this regard, the IPCP (International Panel on Chemical Pollution), with its comprehensive knowledge and expertise on chemical science and policy issues, a profound understanding and extensive experience on science-policy interface work on international, regional, and national levels, and a mission very much in line with the post-2020 chemical and waste management agenda, would be a suitable candidate or, at least, an established and credible starting point for such a role, while providing the opportunity to minimize the concern over duplicated effort and resources. The way IPCP has been working is also consistent with the preferred model suggested in the report from Nordic Council of Ministers. Therefore the analysis and proposition of IPCP could be an important contribution that UK makes to this crucial 'beyond-2020' discussion.

#### ***Background:***

The fourth session of the International Conference on Chemicals Management (ICCM4), through Conference resolution IV/4, launched an intersessional process to provide recommendations on the Strategic Approach to International Chemicals Management (SAICM) and the sound management of chemicals and waste beyond 2020.

The first meeting of the intersessional process on SAICM and the sound management of chemicals and waste was held in Brasilia, Brazil from 7 to 9 February 2017.

The science-policy interface has been proposed again as an important element for the realization of sound management of chemicals and waste beyond 2020. In the [co-chairs' summary](#) the advised action points on science-policy interface includes:

- Explore how to strengthen the link between science and policy in global chemicals governance.
- Consideration of the social interface.
- Explore approaches on the use of science to inform policy making and action, including existing mechanisms, in other clusters, such as climate change and biodiversity.

This document provides an initial analysis of the potential to build the science-policy interface for sound management of chemicals and waste beyond 2020 based on the work and

experience of IPCP, as a contribution that UK could make to this crucial discussion about SAICM beyond-2020.

### ***Science-policy interface for sound management of chemicals and waste beyond 2020:***

The importance of scientific information in sound chemical management has been emphasized in the Overarching Policy Strategy (OPS) of SAICM, on risk reduction, knowledge and information, as well as capacity building and technical cooperation. The role of science in SAICM and beyond-2020 agenda-setting is perhaps of most relevance in relation to emerging policy issues, the nominations of which, along with any subsequently adopted resolutions, must be based on sound science, showing the link between chemical exposures and effects on human health and the environment<sup>1</sup>.

Abundant experience has been gained under other international mechanisms to demonstrate the importance and value of a credible and transparent scientific panel or advisory group in guiding timely and informed decision-making through provision of scientific expertise and advice, e.g. IPCC (Intergovernmental Panel on Climate Change) for UN Framework Convention on Climate Change, POPRC (POPs Review Committee) of the Stockholm Convention, CRC (the Chemical Review Committee) under the Rotterdam Convention, the Scientific Groups of the London Convention/London Protocol on the Prevention of Marine Pollution by Dumping of Wastes and Other Mater, and GESAMP (Join Group of Experts on the Scientific Aspects of Marine Environmental Protection) for different UN systems.

Although precise models and mandates vary among those science panels, the core principles are similar in each case, including an ability for such bodies to work independently of vested interests to provide high-quality scientific advice and reports on both established and emerging issues of relevance to those instruments, drawing upon other expertise as required. In the case of chemicals management, such an interface could, for example, consider evidence relating to substances and groups of substances under regulation or of emerging concern in a transparent way, and could suggest concrete and focused action if mandated, with a credibility and, therefore, authority of which is internationally accepted. This model was preferred in the “Chemicals and Waste Governance Beyond 2020” report by Nordic Council of Ministers, which was presented to the Brazil meeting.

In the same report, it was suggested that ways should be sought to utilize more effectively the existing scientific panels that focus on chemicals and waste, in order to avoid duplication and extra costs.

Taking all of these into consideration, IPCP could serve as a strong candidate or, at least, an established and credible starting point to fill this gap, which has also been mentioned in the Nordic Council report.

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<sup>1</sup> Nordic Council of Ministers (2017): Chemicals and Waste Governance Beyond 2020.

### ***IPCP (International Panel on Chemical Pollution):***

[IPCP](#) is a non-profit association established under Swiss law in 2008. With an increasing awareness of the chemical cocktail humans and the environment are exposed to, and inspired partly by IPCC, the IPCP aims to provide leadership in identifying priority topics of concern, to bridge the gap between science, policy and the public, and therefore to provide policymakers with credible scientific basis to aid decision-making on chemical issues. The IPCP members are independent academic scientists from across the globe and from many scientific fields, which differs from most discipline-based scientific organizations that derive their membership from multiple sectors such as academia, business and government. As such, the IPCP strives to preserve its independence from other sectors and its scientific credibility. The core goal of IPCP of providing independent scientific input and helping to bridge the science-policy gap is fully in line with the needs of SAICM in developing a post-2020 framework.

For these reasons, the IPCP has been closely involved in the SAICM process in the past.

- On policy: IPCP has extensive experience from projects under SAICM and the Stockholm Convention. It has been deeply involved in the 3 science areas in SAICM OPS identified above (details in Annex 1). It has provided detailed analysis of issues connected with substances and groups of substances under regulation or as emerging concern, e.g. PFCs (Per- and poly-fluorinated compounds) and EDCs (Endocrine Disruptive Chemicals), as well as suggesting concrete and focused action for the work of UNEP, OECD and other organizations. Such a role is consistent with the preferred model suggested in the Nordic Council report.
- Funding: The work of the IPCP is mainly project-funded; funding mainly comes from the OECD, UN Environment, and the Swiss Federal Office for the Environment.
- On Science: IPCP has chosen to work independently with other scientific organizations such as SETAC (Society of Environmental Toxicology and Chemistry) in order to maintain its position as an organization of independent academic scientists. A list of IPCP publications can be found in Annex 2.

(For the details of the individual projects or publications, please contact IPCP directly at [info@ipcp.ch](mailto:info@ipcp.ch))

Therefore, in our view, given its broad knowledge and expertise on chemical issues, its deep understanding and extensive experience on science-policy interface work on international, regional, and national levels, and the fact that its mission is very much in line with SAICM and the post-2020 chemical management agenda, IPCP already provides a strong basis upon which to build a science-policy interface or standing scientific advisory body to guide the future work post-2020. Building on IPCP, rather than starting from scratch, will minimize the funding and other resources required in order to establish such capacity. Further discussion of synergies among this new interface with existing ones under different international chemical mechanisms might be useful to further streamline the resources and outputs, by e.g. possibly integrate existing ones with SAICM/post-2020-framework or help the existing ones operate in liaison with SAICM/post-2020-framework.

The analysis and proposition of IPCP could be an important contribution that UK makes to this crucial 'beyond-2020' discussion.

## UK Chemicals Stakeholder Forum

### Sub-Group on the Strategic Approach to International Chemicals Management (SAICM)

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#### Discussions around the post 2020 framework for SAICM (the Strategic Approach to International Chemicals Management) - Greenpeace Views on Most Relevant SDGs:

SDG 3: good health & well being - 3.9 death from chemicals: further regulations on pesticide & industrial chemicals (e.g. EDCs) are closely relevant to the environment & health burden (e.g. NHS burden) in the UK, particularly in the light of Brexit.

SDG 9: industry innovation & infrastructure: a good chemical and waste management system should be one that could drive innovation for a greener and more sustainable future, particularly in the light of Brexit.

SDG 11: sustainable cities & communities: a chance to re-define what kind of sustainable cities & communities are desired by people, e.g. tackle the air pollution issues.

SDG12: responsible consumption & production: planetary boundary for resources and for pollution has a limit. The unsustainable consumption in developed world drives unsustainable production and lots of unnecessary waste (of resource & energy) & pollution. The double standard implemented by many global companies not only bring in pollution into manufacturing countries, but also bring pollution back to developed countries (like UK) via either global trade, or the trans-boundary movement of chemicals.

SDG 13: climate action: SAICM (& chemical and waste issues) could be more prioritized if the climate relevant regulations/conventions could be included under its umbrella, e.g. the Montreal Protocol.

SDG 14: life below water - 14.1 reduce marine pollution: it could include both chemical and waste (e.g. plastic) pollution which is currently quite a hot topic in the UK. In 2015 Meeting of Contracting Parties to London Convention/London Protocol, the governing bodies "encouraged Parties to take into account the issue of plastics and marine litter when applying the dredged material waste assessment guidance". LC/LP could however could only deal (partly) with end of pipe problem, therefore it's up to SAICM beyond 2020 to tackle the source issue.

SDG 17: partnership for the goals: it's cross-cutting issues, needs multi stakeholder, multi-sector partnership.

## Annex 1. IPCP activities under SAICM, Stockholm Convention and other matters, on technical work, science-policy communication and capacity building

(A clearer version with hyperlinks to those work is available in the second attachment of this email.)

International Panel on Chemical Pollution (IPCP)			
Technical Work	<p>2016-2017: Observer and on-site technical support for the Swiss delegate at the meetings of POPRC and COP</p>	<p>2013-2015: Drafted two papers on per- and polyfluoroalkyl substances (oe.cd/1FR; oe.cd/1FQ), commissioned by OECD/UNEP Global PFC Group</p> <p>2015-2016: Commissioned by UN Environment to provide technical assistance in implementing and developing its GEF-funded projects related to "Chemicals in Products"</p> <p>2016-2017: Developing three overview reports on the scientific knowledge and regulatory frameworks of endocrine disrupting chemicals, commissioned by UN Environment</p>	<p>2012: International Expert Workshop on "Planetary Boundaries for Chemical Pollution". (<a href="http://doi.org/10.1016/j.envint.2015.02.001">http://doi.org/10.1016/j.envint.2015.02.001</a>)</p> <p>2017: Developing a chapter on Emerging Policy Issues for &lt;&lt;Global Chemicals Outlook II&gt;&gt;, commissioned by UN Environment</p>
Capacity Building	<p>2010-2012: Commissioned by UN Environment to provide technical assistance in implementing its GEF-funded projects "Passive Air Sampling under the Global Monitoring Plan for Persistent Organic Pollutants 2010-2011" in 20 developing and transition countries, incl. capacity building (<a href="http://dx.doi.org/10.1016/j.trac.2012.05.0">http://dx.doi.org/10.1016/j.trac.2012.05.0</a>)</p>	<p>2010-2014: QSP Project in Armenia, Chile and Ghana "Training on risk assessment of chemicals at national level in a global context"</p>	
Science-Policy Communication	<p>2013: side event at COP 6 "Challenges for POPs monitoring - How can we use international synergies to support the effectiveness evaluation under the Stockholm Convention?"</p>	<p>2015: side event at ICCM 4 "Transfer of knowledge from science to policy"</p>	<p>2017: Co-organising "BAFU-ETH-IPCP International Workshop Supporting the Dialogue Between Science and Policy on Per- and Polyfluoroalkyl Substances"</p>
	the Stockholm Convention	SAICM	Other matters

## Annex 2. IPCP publications

- 2017: Co-organising a “BAFU-ETH-IPCP International Workshop Supporting the Dialogue Between Science and Policy on Per- and Polyfluoroalkyl Substances”.
- 2017: Developing a chapter on Emerging Policy Issues for Global Chemicals Outlook II, commissioned by UN Environment.
- 2016–2017: Developing three overview reports on the scientific knowledge and regulatory frameworks of endocrine disrupting chemicals, commissioned by UN Environment.
- 2016–2017: Observer and provider of on-site technical support for the Swiss delegate at the meetings of the POPRC and the COP of the Stockholm Convention.
- 2015–2016: Commissioned by UN Environment to provide technical assistance in implementing and developing its GEF-funded projects related to “Chemicals in Products”
- 2015: Publication: Diamond ML, CA De Wit, S Molander, M Scheringer, T Backhaus, R Lohmann, R Arvidsson, Å Bergman, M Hauschild, I Holoubek, L Persson, B Suzuki, M Vighi, C Zetzsch. 2015. Exploring the planetary boundary for chemical pollution. *Environment International* 78:8-15. DOI: 10.1016/j.envint.2015.02.001.
- 2015: Side event at ICCM 4 on “Transfer of knowledge from science to policy”
- 2013–2015: Drafted two publications on per- and polyfluoroalkyl substances (oe.cd/1FR; oe.cd/1FQ), commissioned by OECD/UNEP Global PFC Group
- 2013: Side event at COP5 of the Stockholm Convention on “Challenges for POPs monitoring – How can we use international synergies to support the effectiveness evaluation under the Stockholm Convention?”
- 2012: International expert workshop on “Planetary Boundaries for Chemical Pollution” with publication in 2015 (<http://doi.org/10.1016/j.envint.2015.02.001>)
- 2010–2014: IPCP was the executing agency of a SAICM QSP project (multi-country) in collaboration with the governments of Armenia, Chile and Ghana; the title of the project is "Training on risk assessment of chemicals at national level in a global context".
- 2010–2012: Commissioned by UN Environment to provide technical assistance in implementing its GEF-funded project "Passive Air Sampling under the Global Monitoring Plan for Persistent Organic Pollutants 2010-2011" in 20 developing and transition countries, incl. capacity building (<http://dx.doi.org/10.1016/j.trac.2012.05.011>)
- 2011: Publication “The International Panel on Chemical Pollution (IPCP)”, in: Wexler, P., van der Kolk, J., Mohapatra, A., Agarwal, R. (eds.) *Chemicals, Environment, Health. A Global Management Perspective*. Taylor & Francis, Boca Raton, USA, 359–370.