



**Australian Government**

**Department of Climate Change, Energy,  
the Environment and Water**

Dr Anita Breyer  
President  
Fifth International Conference on Chemicals Management  
German Ministry for Environment, Nature Conservation and Nuclear Safety  
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**Dear Dr Breyer**

Thank you for the opportunity to provide a submission of views on behalf of Australia on a possible High-Level Declaration of the Fifth International Conference on Chemicals Management (ICCM5).

Australia is supportive of the adoption of a High-Level Declaration (HLD) at ICCM5, and considers the elements proposed in the report of the virtual Informal Drafting Group (IDG) to be a good basis from which to continue work on the HLD. In particular, we wish to highlight and support the inclusion of following key concepts as captured in the IDG report:

- The contribution of the sound management of chemicals and waste to achievement of the 2030 Agenda and Sustainable Development Goals, and addressing the triple planetary crises of climate change, biodiversity loss, and pollution.
- The human experience, and the impacts of chemical and waste pollution on women, children and indigenous peoples
- The importance and value of traditional, indigenous and citizen knowledge
- The importance of moving towards a safe circular economy, taking a life cycle approach, and promoting safe and sustainable by design approaches
- The benefits of achieving the sound management of chemicals and waste

We have provided some technical comments, in the attached document, on some HLD elements outlined in the IDG report. In addition, the HLD may wish to acknowledge the link between the beyond 2020 framework and the recently agreed Kunming-Montreal Global Biodiversity Framework.

We understand that a zero-draft text (or similar proposal) will likely be developed for consideration by ICCM5. Should this zero-draft be substantially different from the outcomes of the Informal Drafting Group as a result of this consultation process, we would appreciate our comments being reflected in the zero-draft in the spirit and context in which they are provided.

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We look forward to participating in the finalisation of the beyond 2020 framework for the sound management of chemicals and waste at IP4.3 and ICCM5 in September in Bonn.

*Yours sincerely,*

Rachel Burgess

SAICM Australian National Focal Point

Branch Head, Chemicals and Atmosphere Branch

Australian Government Department of Climate Change, Energy, the Environment and Water

**14 July 2023**

**Attachment**

**A:** Technical comments on HLD elements in the report of the Informal Drafting Group

**ATTACHMENT A**

	<b>Element (text)</b>	<b>Australian comments</b>
2	<p>Science clearly shows that the earth’s environmental, agricultural, labor and human health challenges should be addressed together to achieve sustainability. Pollution together with the loss of biodiversity, and climate change undermines our efforts on 80 per cent of assessed Sustainable Development Goal targets. Safely managing chemicals at all levels <b>[and throughout their life cycle]</b> in addition to reducing and managing waste better, including by mainstreaming at the country level is a pre-requisite to achieve the 2030 Agenda and <b>[all 17 Sustainable Development Goals, in particular]</b> <del>more specifically</del> SDG 12.</p>	<p>Suggested added text on managing chemicals throughout their life cycle, as this is an established principle in (for example Articles 11 and 16 of the Rotterdam Convention, UNEA Resolution 5/14, and the Forward to the Minamata Convention.</p> <p>We also suggest highlighting the relevance of the sound management of chemicals to achieving all 17 SDGs.</p>
4	<p>The projected doubling of the global chemical industry by 2030 with its cutting-edge creativity will continue to provide society with benefits. Chemicals are the building blocks of resource efficient technologies, materials and products and help us manage global disease threats such as COVID-19. These advancements, however, must not come at a price that results in a turning point from which planetary and human health cannot recover. The capacity of industry, the private sector and of respected academics to provide safe, innovative, and sustainable chemicals and <del>safer, including</del> non-chemical alternatives is vital to offer new solutions, new business models and support both the green and the digital transformations of the global economy and society. Business as usual is not an option.</p>	<p>Suggested amendment to clarify this text as it is confusing as written.</p>
5	<p>Acknowledge and voice concern regarding the unacceptable and widening gap between developed and developing countries and their capacity to detect and analyze hazardous chemicals, protect the rights of workers, women, children, indigenous peoples and other vulnerable groups through managing chemicals and waste safely. Recognize the critical importance of human rights relating to the enjoyment of a safe, clean, healthy, and sustainable environment. <b>[...]</b></p>	<p>Suggest splitting element 5 into two separate elements. There are two quite distinct and important concepts here which we should not conflate.</p> <p>Also, we suggest deleting final sentence, as this is duplicative of element 6(ix) and para 22 of the Single Consolidated Document.</p>

	<p><b>5bis</b></p> <p>Improving access to knowledge, science and technology including traditional, indigenous and citizen knowledge, is essential to protect all populations and understand the dimensions of chemical use and exposure on the vulnerable groups.</p> <p><del>Scientific uncertainty should not prevent precautionary measures being adopted quickly and decisively when the potential environmental or human health risk is high.</del></p>	
6	<p>Recognize the crisis we face from polluting our planet and the role that chemicals and waste play. Announce focused action both immediately and over the next decades to protect our planet, <b>[our environment]</b> and human health:</p>	<p>Suggest specifying 'our environment' to ensure there is no confusion that this is included.</p>
6(ii)	<p>Stress the responsibility of all, including industry, to make available, accessible and in an understandable format, data and information on health, risks and environmental effects of chemicals. This includes through the production, use, re-use or recycling and/or disposal <b>[and remediation]</b> stages and any products made from chemicals, the implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), whilst respecting the confidential business information not related to health and the environment.</p>	<p>Suggestion to reflect the importance of remediation in achieving the sound management of chemicals, as well as existing and potential future obligations under MEAs.</p>
6(ix)	<p><del>The lack of full scientific certainty may not be used as a reason for postponing measures to prevent environmental degradation and adverse health effects whilst making all efforts that chemicals are used and produced in ways that lead to negligible adverse effects on human health and environment in line with the precautionary <b>[approach]</b> principle.</del></p>	<p>A similar paragraph has been included in the Single Consolidated Document (para 22), so may not be necessary in the HLD.</p> <p>If retained in the HLD, to maintain consistency with the Single Consolidated Document, Rio Declaration, and other chemicals and waste MEAs, the precautionary 'approach' should be referred to.</p>
6(xi) bis	<p>Incentivize the financial system, nationally and internationally, to align financial flows to environmental commitments and the Sustainable Development Goals, to take into account the value of promoting <b>[safe, innovative, and sustainable]</b></p>	<p>Suggest using text from element 4 for consistency.</p>

	chemicals and non-chemical alternatives]. green and sustainable chemical solutions	
7	Strengthen the co-ordination between [upstream and downstream] sectors and stakeholders and work more urgently with downstream users through an inclusive and participatory approach to achieve the transformational success required. Call for an endorsement by UNGA of the Beyond 2020 framework	To ensure the inclusion of sectors and stakeholders from across the entire value chain and life cycle.