Thank you for the invitation to submit views on key elements of a possible ICCM5 High-level Declaration. Australia appreciates the opportunity to provide input to the intersessional process and contribute to the work of the informal group.

To date, SAICM has brought together stakeholders to work on many critical issues. Going forward, it will be important to continue to build on the progress made on accepted challenges, such as lead in paint and endocrine disrupting chemicals. However, it will also be important to ensure that this global group of stakeholders continues to advance sound management of chemicals and wastes by tackling emerging concerns.

The COVID19 pandemic will undoubtedly influence the nature of these emerging concerns. While there will be important opportunities for a greener recovery, we cannot ignore that these economically trying times will – in some cases – impact our progress on the sound management of chemicals and wastes. Countries with more fragile economies may be expected to be more susceptible to these impacts, and the support that initiatives such as the beyond 2020 framework can provide for these countries will be even more important than before the pandemic.

Concurrently, the global distribution of chemical production and use continues to shift. Increasingly, chemicals are introduced to developed economies not through manufacture or neat import, but in finished products and articles. These chemicals are often not subject to the same regulatory frameworks, resulting in significantly less awareness, assessment and management. It is becoming clear, globally, that this is a critical gap in the management of chemicals and waste.

The importance of this gap is growing more evident as support for recycling and circular economy initiatives increases. As finished products and articles of largely ambiguous composition enter these re-manufacturing streams, the risks of unforeseen health and environmental impacts increases. The environmental, economic and social value of re-directing waste into commodities is clear, so it is vital that the global framework for managing chemicals be positioned to support this.

A commitment to lead a concerted push to improve supply chain transparency and our understanding of chemicals in finished products and articles will speak to these concerns. Assisting importers of finished products and articles to better manage these chemicals across their lifecycle, through education, information sharing, product stewardship and other partnership initiatives, will support our goals, while also leveraging market forces to minimize health and environmental impacts in regions that most need global support. The multi-stakeholder nature of SAICM makes this the appropriate forum to work together on this issue.

Australia proposes that the importance of increasing transparency and understanding about chemicals in finished products and articles be considered a key element of a possible ICCM5 High-level Declaration and contribute to shaping the post-2020 sound management of chemicals and waste agenda.

Thank you again for the opportunity to contribute to this process.

Kind regards,
Jess

Jessica Phillips
My normal hours are Mon-Tues (WFO) and Thurs-Fri (WFH), 9:00 to 5:00.