

Can Zhou

From: Ahrens Ralph <Ralph.Ahrens@bund.net>
Sent: Wednesday, 15 May, 2019 22:03
To: UNOG-UNEP-Chemicals SAICM
Cc: Cameron Patricia
Subject: SAICM beyond 2020 - Input of Stakeholders

Follow Up Flag: Follow up
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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

Ralph H. Ahrens

International Chemical Policy Officer
Department Substances and Technologies
Bund für Umwelt und Naturschutz Deutschland (BUND)

Friends of the Earth Germany

Kaiserin-Augusta-Allee 5, D - 10553 Berlin
Germany
Fon: +49 30 27586-423
www.bund.net

