

Input to the SAICM Intersessional Process Co-chairs consultation process – Bosnia and Herzegovina

Dear colleagues,

Regarding *the Compilation of recommendations regarding the Strategic Approach and the sound management of chemicals and waste beyond 2020, for consideration by the fifth session of the International Conference on Chemicals Management* and questions sent out to all stakeholders I inform you on the following:

Having in mind that this text in the future will serve all potential stakeholders – the text of the instrument should be as simple and clear as possible. Please consider “breaking” these long sentences in several that are easier to comprehend (note that sometimes it is difficult for SAICM focal points and other much-engaged stakeholders to comprehend all said). Text is at some parts very difficult to follow (you must read one sentence several times in order “to get the picture” of what is said; I imagine that a person new to the process will have hard time understanding it - like for example a government official).

We suggest that *Definitions* should be added as a crucial part of this document. We understand it is a working document, but even at this stage, it will be very difficult to compile it all without clear definitions. It should be clear to all what is considered by chemicals, waste, government, national, sector, stakeholder, enterprise/company/industry, private sector etc. That way the document will be more “fluent” in terms of understanding it. Moreover, sentences will be shorter since terms set in definitions would be consistent throughout the document.

Please list the IOMC organizations, not all stakeholders are familiar with it.

Please note that stakeholders must include healthcare services (health is stated as one of the sectors, but stakeholders in health should be addressed too). Note that these services are crucial because they prevent and treat harm caused by chemicals. They are mobilized in case of accidents caused by chemicals as well. It must be clear that they are equally important as academia/industry and other stakeholders mentioned in the document.

We all need to note that targets set out (as logical as they are) cannot be reached by all countries (some maybe never to that extent). Please consider setting out priorities (in sets) that are common to most (like having GHS in place, legislation on chemicals, certain conventions ratified etc). We prioritize certain actions (Set 1), which are in the future followed by other (Set 2) etc.

In regard with Targets for Strategic objective D: “*Benefits to human health and environment are maximized*” strengthening capacities of the health sector should be considered as well (or anywhere in the text involving strengthening capacities). Note that the health sector has a very important role, as previously mentioned, yet many countries do not have a mechanism in place to strengthen their capacities. We are not addressing the poison control centers here, we are talking about strengthening this sector. Governments should take these obligations upon them and international organizations should find a way to support it through networking, financing etc.

Targets for Strategic objective D (as well as other “parts” of the text) stress the importance of private sector involvement (financial etc.). We have noted that for example “*Companies consistently invest in and achieve*

innovations toward advancing green and sustainable chemistry”, while “Countries] [governments] implement policies that encourage production using sustainable and safe(r) alternatives”. We should all consider that governments should also invest, not only industry. Government should take the important leading role and set out example, and give in at least some initial financial support. We have noticed that more financial obligations are on the industry, very few on the governments.

Regarding Mechanisms to support capacity building and Taking Stock of Progress - consider adding that the stakeholder-secretariat communication should be copied to the focal point as well. (All stakeholders are invited to report to the International Conference, through the Secretariat, on the implementation efforts and the progress of indicators and milestones... Such updates or revisions may be proposed by any [government] [stakeholder])).

Regarding C.Dedicated external financing 12 Bis: [Governments agree to develop a mechanism instituting a globally coordinated fee of [0.05%] [0.5%] on the sales of a limited number of basic chemicals (or chemical feedstock). Governments agree to allocate the proceeds of this globally coordinated fee to the international fund mentioned in paragraph 13] we are not sure that this is applicable for all countries.

It is very important to be clear on what is considered as national and government. (Mechanisms to support implementation, B. National Implementation: At the national level, governments, as appropriate, should undertake, in accordance with their laws, regulations, policies, and priorities, actions to build or improve regulatory and non-regulatory frameworks and institutional structures and capacities for multi-sectoral coherence [for the sound management of chemicals and wastes] [in the implementation of the beyond 2020 instrument], as well as urge complementary action by relevant stakeholders).

Terms such as: national plans of action, concerned national department, the need to develop, implement and enforce basic national legislative and policy frameworks, national institutional capacity (even when having in mind the multistakeholder and multi-sectoral nature of the instrument) can be misinterpreted.

*Note that to have something in place at the national level (when it comes to actions supporting the future instrument) not all countries have chemicals and (associated) waste regulated by one sector. Additionally (and more important), some countries regulate chemicals (and waste) at a local, not national level. In order to achieve targets set by the instrument it must be clear that *government, country* and *national* refer to countries own constitutional and appropriate legal arrangements (therefore this should be defined under *Definitions*). This is very important not only when it comes to passing legislation to support the instrument in the future, but financing it as well in some countries because all the actions (including enforcement) are done on the local level. Having an instrument in place suggesting all actions should be taken on the national level leaves gaps to be misinterpreted in a way that this instrument is advising changes in the constitutional arrangements of certain countries.*

Please consider adding the Action plan (maybe similar to the Chemical Road Map developed by WHO).