

## Input to the SAICM Intersessional Process Co-chairs consultation process – UK

### GENERAL REMARKS

- We agree with the need for a general overview of the consolidated text checking for consistency (including Table of Contents) and agree with identified legal revision findings. We agree any new textual amendments should be clearly marked and agreed by consensus before being integrated into the text.
- Potential omissions and recommended additions should be noted and marked separately.
- It would also be helpful to check for grammar and punctuation. It may not be the most important issue, but grammatically correct text provides clarity and is easier to understand. Should this introduce any potential changing of meaning, these should also be clearly marked and agreed before being incorporated.
- We agree with additional recommendations for discussion on a policy resolution from ICCM5 on the name and adoption of the new framework and an omnibus resolution from ICCM5 on transitional arrangement and early implementation, and welcome the offer of the co-chairs' draft. We would emphasise that both of these should be kept as simple and as streamlined as possible to ensure our time at the resumed IP4 meeting can remain focussed on the new framework. **Progressing the targets seems to be the highest priority for work at IP4.2.**
- As mentioned by co-chairs, the relevance of sections of the current SAICM text, for eg. the headings 'Overarching Policy Strategy' or 'Global Plan of Action', and the Overall Orientation & Guidance needs to be discussed and agreed to ensure we can move forward with a document that is as easy as possible to use. We would welcome recommendations from the Secretariat and Co-chairs on those points.
- A glossary of terms would be useful (waste, enabling framework etc).
- It is not clear who and how stakeholders can become part of beyond 2020 – perhaps this needs to be spelled out in text or separate document/attachment.

### CONSULTATION QUESTIONS

- **What are the gaps, enhancements or improvements to be made in the text?**

#### Introduction or general remarks

We need to ensure that women's issues are referenced not only in the context of impact of chemicals on human health but also in representation (for example neither section on Bureau nor rules of procedure discuss gender representation). We would be happy for this issue to be referred to in high level terms once at the beginning of the document rather than in many places throughout the text.

Indicators are currently not specified anywhere, albeit there are a few very high-level mentions within the text. We would recommend that they should be included in the heading "Vision, Strategic Objectives [and] Targets, **and Indicators**", with appropriate text, and then detailed in annexes, including timelines for implementation and review).

#### Reporting

There is potentially a need to add an annex, with clearly defined step by step process, detailing formats for reporting, timelines, tools, links to websites, documents or forms, and identifying (if agreed) responsible organisations etc.

#### Finance/ capacity building

There is a lack of references to green finance and green taxonomy approaches within the text. Such approaches are necessary to improve private sector involvement in funding and

promoting global chemicals management, and while green finance is referenced in the text, more detail could be included to clarify the specific activities and practices required to facilitate it, as well as the roles and responsibilities of stakeholders in doing so. Paragraphs 9, 10 and 11 of the text on private sector involvement in the integrated approach could be a good place to do this. These paragraphs could benefit from some specific attention to ensure clarity.

- **Does the text adequately strengthen and enhance sectoral and multistakeholder engagement and ownership including for the private sector?**

The ICCM, Secretariat, IOMC, governments and regional organisations are all tasked with promoting, enhancing, and supporting multisectoral and multistakeholder participation. At this moment it seems that we are sending a sufficiently strong message. The private sector is addressed separately, and examples of possible contributions are provided. As above, the text on private sector involvement within the integrated approach to finance could probably be made more succinct, and suggest some specific roles for different stakeholders. However, we cannot predict all ways of working, and it may be better to leave some flexibility and room for future review, particularly given the pace of change within the chemicals space.

- **Does the text fully reflect the ways of working and responsibilities of all stakeholders?**

We do not think this should be our ambition as it is potentially unachievable and could result in an inflexible text. We think it would be best to ensure the instrument serves as a platform for all to engage, see their role and be able to shape it too. Targets should help stakeholders to define their role. One exception would be governments' roles which should be generally defined, and largely we think they are.

- **Could the placement of some text in the document be modified, or moved out of the consolidated text and into a resolution?**

We agree that issues of concern (we note that that there is not yet an agreed title for the section) should feature within the core text.

- **What parts of the document could be considered static versus dynamic i.e., be more easily amended?**

Whilst it is helpful from a presentational perspective to see the targets reflected in the body of the text, in practise targets should go in an annex in order that may be revised (and thus 'future proofing' the instrument), along with indicators against them when they are available.