

Input to the SAICM Intersessional Process Co-chairs consultation process – Health sector civil society

2 December 2022

Name of NGO: **Health Care Without Harm** in consultation with the World Medical Association (WMA) and World Federation of Public Health Associations (WFPHA)

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Thank you for the opportunity to consult with the co-chairs in preparation for the continuation of IP4 in Nairobi.

We want to express an overall concern on the process of this consultation: the exclusive nature of the invitation limiting participation to 3 representatives of stakeholders to the meeting introducing the consultation.

It is unclear how the inputs received will impact the consolidated document and how changes, if any, will be reflected such as in SAICM/IP.4/INF/17 Table comparing the SAICM Overarching Policy Strategy, SAICM/IP.4/2/Rev.1 “Compilation of recommendations regarding the Strategic Approach and the sound management of chemicals and waste beyond 2020” and the Outcomes of the Virtual Working Groups.

1. Do you think the Co-Chairs consolidated document (as it looks now, posted [here](#)) will help us achieve our vision for the new SAICM framework Beyond 2020?

Please explain why/why not.

The vision is not ambitious enough nor clear and simple enough for implementation. Sectors such as health and labour priorities’ need to be more visible in the new instrument. It is highly recommended that the Compilation of Recommendations text reflect the priorities of different sectors.

2. What are the gaps, enhancements or improvements to be made in the text?

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

Please explain why/why not.

No. The structure and framework of the text is difficult to follow. The WHO Roadmap on Chemicals with its objectives organized by stakeholder is much clearer and illustrates the importance of collaboration, roles for various stakeholders and which of the objectives benefit from a multi-stakeholder approach to the work. The Roadmap is complemented with a workbook for assist in implementation. This is critical for SAICM focal points in support of their role facilitating a multi-stakeholder, multi-sectoral approach.

The African proposal, Code of Conduct, provides an organization and framework that is user friendly for implementation.

4. Does the text fully reflect the ways of working and responsibilities of all stakeholders?

Please explain why/why not.

No. The text indicates that stakeholders should collaborate but does not provide information about ways of working. See above #3 response. IP.4/INF/7/Rev.1: Possible guidelines for SAICM National Focal Points is a good start and should be expanded with recommendations to develop a

multi-sectoral and stakeholder mailing list to share communications from SAICM and develop a coordinating group at the national/subnational/regional level for this purpose.

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

If yes, which type of text?

Currently it is difficult to understand SAICM because there are too many documents to track and integrate in use. For example reference to the Global Plan of Action and the Overall Orientation and Guidance are missing from the discussion and in the consolidated text. Elements of the OOG should be included in the basic framework of the Beyond 2020 instrument.

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

The static parts would be part of the fixed core, whereas the dynamic parts would be more easy to change.

Static parts of the document form the core of the instrument/framework, such as scope, vision, strategic objectives, institutional arrangements, mechanisms to support implementation (including potential roles of sectors and stakeholders), capacity building and financial considerations.

Procedures for dealing with issues of concern with criteria for evaluating the effectiveness of progress on a particular issue should be included in the core with workplans and indicators for the IoC could be included in the Annex.