

Submission on Issues of Concern from the following organizations and stakeholders:

Health and Environment Justice Support (HEJSupport)
Swedish Society for Nature Conservation (SSNC)
Pesticide Action Network (PAN International)
groundWork South Africa
Women Engage for a Common Future (WECF)
Armenian Women for Health and Healthy Environment (AWHHE)
Toxisphera, Brazil
Commonweal
BUND/Friends of the Earth, Germany
German NGO Forum on Environment and Development
Chemical Safety Agency, Ukraine

In our "A group of NGOs" submission of November 6, 2020 we proposed complimentary criteria (triggers) for identifying the need for action to elevate an IoC to the next level of obligation (voluntary or binding) by stakeholders. We also outlined the sequence of decisions for ICCM to take in response to the trigger evaluation.

Rationale:

It is important that the modalities for reviewing of existing IoCs, and how the ICCM can/should respond in relation to reviews, need to be clearly established in the text of the successor to SAICM. As it is proposed in our NGO submission, our proposal for the trigger criteria for elevating obligations when the voluntary work is insufficient should be considered here as well. "Trigger criteria", in contrast to evaluation of a long-term workplan for an IoC are designed to identify and address IoCs, or key aspects of them, that need urgent action with increased ambition level. Such evaluations do not follow the periodic review of workplans, rather can be done on a needs basis. These are two evaluation criteria with different functions, and thus we need both sets of evaluation procedures.

The following text was proposed in our submission of November 6, 2020, and we request that it be retained in brackets:

Annex B IV, D. 1.

a) Determining the need for further work on an issue will be based on the results of a progress evaluation. **In considering whether further work requiring elevated obligations for stakeholders is necessary, the conditions and triggers described under b shall be used.]**

b) Elevated action on an Issue of Concern is justified by a) meeting one of the triggers below, and b) if the IoC at the same time contributes to key strategies for the fulfillment of at least one SDG target in one UN region:

(I) Failure to reduce acute poisoning and/or chronic effects by chemicals that are IoCs¹⁰.

(ii) Failure to reduce the levels of chemicals that are IoCs in human and environmental samples⁹.

(iii) Failure to reduce the volume of the production, use and disposal of substances of very high concern relevant to an IoC.

(iv) Insufficient monitoring of human and environmental impacts by an IoC¹².

(v) Significant costs for society in the absence of action to address an IoC, including healthcare costs for individuals and the state; loss of IQ and productivity; loss of pollinators, natural biological control of pests, and other ecosystem services; loss of biodiversity; and costs of chemical contamination of natural resources, such as air, soil and water including but not limited to large-scale environmental clean-up and remediation costs.

(vi) National regulations have failed to achieve sufficient improvement in the IoC. SAICM/IP.4/2.

(vii) Regional regulations for addressing an IoC are in place, or under development.

(viii) Failure to establish an effective, transparent multi-stakeholder working platform on an IoC.

(ix) Failure to make available the information necessary for addressing an IoC.

(x) Failure to reduce the level of disposal and contamination of waste of relevance to an IoC.

For further and more detailed information about the proposed “trigger criteria”, please see:
<https://hej-support.org/event-how-to-progress-saicm-issues-of-concern-beyond-2020/>