A group of NGOs[1] input to the possible High-Level Declaration (HLD) of ICCM 5

What would you consider the most important contextual aspects needed as a foundation for a possible ICCM5 HLD? These may include consideration of:

o The key pollution planetary crisis challenges our work aims to deal with to realize the essential sustainable development benefits.

Prioritizing efforts to mitigate key pollution problems is essential to realize the core benefits of sustainable development. It includes fostering international regulations and cooperation to address pollution globally, enforcing strict national regulations, implementing sustainable

[1] HEJSupport, Swedish Society for Nature Conservation, groundWork (South Africa), ZERO, (Portugal) BUND (Germany), ALHem (Serbia), Women Engage for a Common Future, Armenian Women for Health and Healthy Environment (AWHHE), ESDO (Bangladesh), FSCI (Tajikistan), Angel (Kazakhstan), CEJAD (Kenya), Canadian Environmental Law Association (CELA), Greenwomen (Kazakhstan), NGO Chemical Safety Agency (Ukraine), RUZGAR (Azerbaijan), Forum Environment and Development (Germany), Ecovision (Georgia), International Social Ecological Union (International), Doctors for the Environment (Moldova), Independent Ecological Expertise (Kyrgyzstan), Ecocity (Greece), BANToxics (Philippines), Toxisphera (Brazil), Taller Ecologista (Argentina), Journalists for Human Rights (North Macedonia), Accion Ecolgica, European Environmental Bureau, CSD (Kazakhstan), PAN Asia Pacific, PAN Germany, PAN UK, PAN Africa, Rapal (Argentina)

practices, reducing production and consumption, ensuring public engagement, and raising awareness and education.

It is essential to understand that pollution includes not only physical pollution from waste, rather also chemical pollution from toxic chemicals often involved in various stages of resource extraction, refining, manufacturing processes, released from materials, products, and waste management. Chemical pollution results from releasing hazardous substances into the environment, including pesticides, industrial chemicals and pharmaceuticals, toxic plastic additives and processing aid chemicals. It poses risks to ecosystems and human health all over the world. At first, addressing chemical pollution includes regulating and phasing out the production and use of harmful substances at all levels. It also requires promoting green chemistry practices and non-chemical alternatives. Moreover, addressing chemical pollution requires implementing effective waste management systems and circular economy practices from the beginning that do not result in the recirculation of hazardous chemicals.

Resource extraction industries, such as mining, oil and gas drilling, often use toxic chemicals in their operations. For example, mining industries may use cyanide, mercury, sulfuric acid and other hazardous elements and compounds to extract valuable minerals from ores. These chemicals pollute water, soil and air, damage ecosystems, and have long-term impacts on biodiversity and human health. It is essential to implement strict regulations and best practices to minimize the use of toxic chemicals in resource extraction and to ensure that chemical pollution and waste are minimized to the extent possible, properly contained and waste recycled.

Toxic chemicals are commonly used in manufacturing processes to achieve specific product characteristics. These chemicals can include solvents, dyes, flame retardants, heavy metals, and other additives and processing aids chemicals. For example, more than 10,000 chemicals are used in the production of plastics, with about 2,400 identified as potentially hazardous[1]. During the manufacturing process, there is the potential for these chemicals to be released into the environment, resulting in pollution and health hazards to workers and communities. Manufacturers should implement sustainable practices, such as green chemistry principles, using safer and non-chemical alternatives to toxic chemicals, and implementing effective pollution control measures to minimize the impact on workers, communities and the environment. In addition, it is essential to disclose, at the minimum, the presence of toxic chemicals in products to ensure informed decision-making at all stages of product life cycles and by all stakeholders in the value chains [2].

Using toxic chemicals in manufacturing processes results in their presence in waste generated from various industries, households, and commercial activities. Unsound waste management practices, such as inadequate disposal, burning or dumping, leads to uncontrolled release of toxic chemicals into the environment. The absence of provisions for globally harmonized and legally binding chemical transparency information and its traceability in individual solid materials,

products, or articles [3] throughout the entire value chain undermines the informed decision-making needed for sound waste management.

To address the presence of toxic chemicals in resource extraction, refining, manufacturing processes, and waste management, it is important to establish and enforce robust global regulations that limit the production and use of toxic chemicals, promote safe alternatives, including non-chemical alternatives, and ensure proper handling and disposal of waste. A globally harmonized and legally binding chemical transparency mechanism, including tracking of chemicals in individual materials and products, needs to be developed and adopted globally by all countries to fully ensure informed decision-making throughout the entire lifecycle of products and within all value chains. Many product value chains are multinational nowadays, so a global mechanism is necessary. Compliance with these regulations at the national level should be regularly monitored and enforced.

Moreover, industries should prioritize pollution prevention by complying to national and global regulations, adopting cleaner production techniques, implementing waste minimization programs, and promoting the phase-out of hazardous substances and the use of non-chemical alternatives. This approach can reduce the reliance on toxic chemicals and minimize their release into the environment. Governments must ensure strict control measures are in place and enforced to achieve full compliance and minimize exposure to human health and the environment by toxic chemicals.

To maximize the effective measures in addressing the pollution planetary crisis, it is important to ensure inclusivity, transparency and accessibility of chemical information, equity, and involvement of all stakeholders in decision-making process, including policy work on chemicals and waste. Engaging diverse stakeholders, including marginalized communities and vulnerable groups, Indigenous Peoples, women, and youth organizations, promotes equity and ensures that pollution prevention efforts address the needs and concerns of all members of society and are well-understood by all. Public engagement plays a crucial role in pollution prevention by raising awareness, promoting behaviour change, advocating for sustainable policies, fostering community collaboration, and supporting innovative solutions.

To add on, continued research and innovation are crucial for developing safe alternatives, including non-chemical alternatives to toxic chemicals, as well as technologies for effective waste treatment and management. Investment in research and development in safe alternatives can inspire innovation, lead to the discovery of sustainable solutions, and promote traditional and indigenous knowledge that minimizes the use and release of toxic chemicals.

o Linkages with and role in solutions to the other planetary crises of biodiversity loss and climate change.

Environmental pollution from chemicals and waste is one of the main drivers behind biodiversity loss, occurring at an unprecedentedly high rate. A recent publication in the journal Environmental Science & Technology emphasizes that the annual production and release of new substances is growing at a rate outstripping the global capacity for assessment and monitoring. International chemical treaties, including the Stockholm, Rotterdam, Basel, and Minamata Conventions, aim at addressing chemical and waste pollution [4]. However, with few exceptions, the existing chemical conventions do not contain globally harmonized transparency requirements for regulated chemicals in materials and products. There are no requirements for tracking them in individual materials and products throughout their life cycles to minimize exposure to human health and wildlife. This serious information gap makes it difficult to meet these conventions' requirements at the national level, including making informed decisions about handling products correctly and safely, throughout their life cycles and ensuring global safety for people and the environment.

Chemicals and waste pollution, including those caused by plastic production, use and disposal, contribute to climate change, and climate change at the same time exacerbates the effects of pollution. For example, chemicals and polymer production relies heavily on fossil fuels extracted through processes that contribute to greenhouse gas emissions, primarily carbon dioxide. The extraction, transportation, and processing of fossil fuels to make processing chemicals and plastics extends the carbon footprint beyond fuel-to-energy conversions to increased climate change. Furthermore, climate change affects the mobilization and dispersal of chemical pollutants in ecosystems.

Dependency on fossil feedstocks for chemicals in society must decrease. However, replacing fossil with bio-based feedstocks for hazardous molecules should be considered a false solution due to the unintended impacts on food security, and ecosystem integrities and because molecules have the same inherent hazard properties irrespective of feedstock.

o Contributions to addressing other global emergencies such as health, food, and energy security etc.

The sound management of chemicals plays a critical role in addressing various global challenges, including health, food and energy security. For example, sound chemical management helps to reduce human exposure to hazardous substances by minimizing the risks of acute and chronic health effects. At the core is assessing the toxicity of chemicals, establishing safe practices for their handling, implementing sound storage and disposal practices, and promoting safe

alternatives. Ensuring the safe production, use, and disposal of chemicals protects public health and prevents chemical-related diseases.

The sound management of chemicals plays an essential role in ensuring food safety. One aspect is the need for the complete elimination of highly hazardous pesticides. The use of these pesticides causes severe and often irreversible harm to the health of those directly employed in agriculture. In addition, the use of these pesticides has a significant impact on the population's health in the surrounding areas and ecosystems. Furthermore, residues of highly hazardous pesticides in agricultural products continue to affect human health through food consumption. The development and early introduction of safe alternatives, including non-chemical alternatives and the adoption of ecosystem approaches, will ensure food security and engage local communities, including Indigenous Peoples, by supporting their agricultural practices. Another aspect of food safety relates to chemicals in food contact materials, where stringent legislation and policies that respect the precautionary principle, and consider vulnerable groups, such as the unborn, children and elderly, must be applied.

Sound chemicals management also contributes to energy security by supporting the development and deployment of renewable energy technologies. Many renewable energy technologies, such as solar panels and wind turbines, rely on advanced materials and chemicals in their production. Sound management of chemicals supports the growth of renewable energy sectors, reducing dependence on fossil fuels and increasing energy security by ensuring the safe and sustainable production and use of these materials.

o The contribution of strengthened Sound Management of Chemicals and Waste to the implementation of the 2030 Agenda and addressing present and future needs.

Overall, strengthening the sound management of chemicals and waste contributes significantly to the 2030 Agenda by protecting the environment, promoting human health and safety, supporting equity for the most vulnerable, and must include mainstreaming gender equality. It contributes to minimizing risks and reducing pollution related to chemicals and waste. It addresses future needs through sustainable resource management, prevention and minimization of waste generation, lays the foundation for toxic-free circular economy, and development of safe, including non-chemical alternatives and technologies.

Sound chemicals management also supports the development of emergency response plans and capacity-building initiatives to respond to chemical incidents effectively. Minimizing chemical risks and improving preparedness contribute to reducing the negative impacts of disasters on lives, infrastructure and the environment.

Notably, the sound management of chemicals and waste contributes directly to almost all Sustainable Development Goals. For example, it contributes to Goal 3 (Good Health and Well-Being) by reducing exposure to chemicals and preventing related diseases, prioritizing the most

vulnerable, including children, women, and workers. It also contributes to Goal 6 (Clean Water and Sanitation) by minimizing water pollution from industrial production and chemical use and ensuring a safe water supply. In addition, it supports Goal 12 (Responsible Consumption and Production) by promoting the sustainable use of chemicals, including when constituents of materials and products, waste prevention and reduction, safe technology development and innovation.

It is important to stress that sound chemicals and waste management contribute to circular economy principles and resource efficiency, embedded in Sustainable Development Goal targets 12:4 and 12:5. The implication is that it should contribute to reducing, reusing and recycling waste, minimizing the need for primary resources and thereby reducing pressure on ecosystems.

Nevertheless, effective implementation of a circular economy requires transparent information on the presence of chemicals, especially toxic chemicals in products and waste, and traceability for disclosed information linked to individual materials and products. While a Globally Harmonized System of Classification and Labelling of Chemicals (GHS) exists for chemical mixtures, the absence of globally harmonized chemical information in solid materials and products leads to the recycling of toxic substances, contaminating secondary raw materials and products made from these materials. The circular economy can only be safe for human health and the environment if all stakeholders in the value chain make informed decisions based on information about the chemical composition of the materials and products they produce, use and recycle. If chemical information transparency is in place along with traceability, importers, retailers, public procurement agencies, and consumers will make informed decisions and handle waste correctly. Waste vendors, sorters, dismantlers, and recyclers will be able to make the right decisions to ensure safe secondary raw materials.

Moreover, sound management of chemicals and waste should ensure transparency of information on the presence of chemicals in products through a globally harmonized approach. Only then it will be possible to avoid multiple parallel and double standards that jeopardize the safety of human health and the environment, especially in low- and middle-income countries. Nowadays, industrial materials and products supply chains are often multinational, spanning several jurisdictions, have different legal requirements and attract customers who frequently have their standards. Such a situation complicates trade. Small and medium-sized companies with insufficient resources struggle to comply with numerous legal requirements and specific customer standards.

A globally harmonized approach to disclosing chemical identity in products would help address these challenges and ensure a safe, toxic-free circular economy. In addition, to ensure the global traceability of chemicals, a tagging or labelling system to link disclosed information to individual materials and products is essential. Reporting the disclosed data for individual materials and products to a publicly accessible database will help facilitate quick and easy information access.

• In the light of the overall objective to increase the willingness of all stakeholders to assume responsibility including government, private sector and civil society leaders and encourage their strengthened commitment, what should the scope and key elements of the possible ICCM5 HLD messages cover? These may include consideration of:

o The key benefits of sound management of chemicals and waste to society, the environment, and the economy

The benefits of sound management of chemicals and waste can only occur if there is a drastic reduction in the manufacture, use and disposal of harmful chemicals, including those which are persistent, bioaccumulating, or highly mobile.

The large majority of petroleum feedstock-based chemicals should be fully phased out, which will greatly benefit public health, biodiversity, and climate. However, using renewable sources to continue to produce hazardous chemicals is a false solution because a molecule has the same inherent hazard properties irrespective of feedstock.

Safe alternatives should be widely available on the market, focusing on local production and lifecycles, moving entirely from end-of-pipe to toxic-free circular reuse economies. This circular management will create safe and sustainable jobs across the lifecycle of products and services, thus benefiting local and national economies.

The small fraction of hazardous chemicals that cannot be immediately phased out should be entirely managed in closed loops (i.e. no more dispersion of hazardous pesticides nor incineration of waste), ensuring that long-term waste storage by type of waste fraction is operational and fully financed by levies on the production and use of harmful chemicals. This will benefit the public budgets, as they no longer need to subsidize polluters' activities, and will create fiscal space for investments in safe, clean and sustainable alternatives.

o The key responsibilities of the actors of the various sectors (e.g. health, labour, agriculture, economics, finance, environment, research, chemical industry, downstream industry)

While chemicals are the foundation of production and manufacturing processes and technological developments, there is a strong link between exposure to chemicals, chemical pollution and the planetary and human health crisis. For example, there was an increase in exposure calls related to selected cleaners and disinfectants at the beginning of the COVID-19 pandemic. Also, the amount of plastic waste increased dramatically during the pandemic.

According to the UN report, 200,000 people globally die yearly from chronic exposure to agricultural chemicals[5]. Moreover, there is a growing number of deaths associated with pesticide acute poisoning and the use of highly hazardous pesticides and toxic chemicals in consumer products, including products for children.

These and many other examples of the consequences of unsound management of chemicals call for the precautionary principle and the need for considerably increased efforts to manage chemicals better. Hazardous chemicals must be systematically identified, phased out or restricted in material flows so that we unlock the potential to handle the materials in a safe and resource-efficient way throughout their life cycles. Traditional knowledge, including innovative non-chemical approaches in agriculture through agroecological solutions, and restrictions and bans of hazardous chemicals and their substitution with safe alternatives should become the priority for action and the responsibility of all actors in the various sectors.

o **Progress in efforts undertaken to date, and critical gaps to be addressed**

Recognition of the SAICM Issues of Concern (IoCs) as priority issues affecting humans and the environment across jurisdictions and administrative borders, such as regions and countries, is an important effort undertaken to date. The adoption of an IoC by SAICM stakeholders is a recognition of the cross-sectorial importance of the IoC for the sound management of chemicals and waste specifically and its significance for creating conditions for the fulfilment of the Agenda 2030. Thus, IoCs have universal importance for the sustainable development agenda that cannot be captured with just an IoC-specific work plan.

The existing IoCs are a good example of how stakeholders of the current SAICM have implemented this approach. All eight IoCs are of global value, while their specific work plans, listed in Annex I, IV/2: Emerging policy issues of ICCM 4 report [6], only invite selected relevant stakeholders to report on progress, conduct information and education campaigns or provide financial and technical resources of the limited scope defined in the workplans. Thus, implementation of these work plans alone will not help to meaningfully address IoCs as issues of global importance, substantially reduce the associated environmental and health risks, or mean that an IoC is solved and in no need for further prioritization and action.

The IoCs work plans are developed in a way that they are realistic and implementable within a given time frame, thus, making the scope of an IoC workplan, by necessity, narrow. It cannot capture the full range of relevant aspects of an IoC to the Agenda 2030, their cross-cutting character, and their relevance to multilateral agreements, such as, for example, the Convention of Biological Diversity.

Therefore, if the need to continue to work on an IoC is evaluated only against its work plan, we are at risk of prematurely sunsetting chemicals and waste issues of universal importance to the sustainable development agenda. For example, just ticking boxes of the work plans for existing IoCs may result in sunsetting nearly all of them. However, according to SAICM independent evaluation of 2006-2015[7], progress in addressing the IoCs is mainly limited to information collection, and only some concrete risk elimination or risk reduction measures have been undertaken.

Consequently, a full explanation of the reasons for extending the work with an IoC should be captured by a set of criteria[8] complementary to the work plan, and that can be in an annex to the new instrument. The reason why criteria are necessary is that the explanation should be based on an assessment method that is as reproducible as possible.

The criteria should be accompanied by indicators that match these criteria, including time-bound goals, a process of critical evaluations against these goals, and the process for including increased obligations on stakeholders if assessment against the criteria demonstrates insufficient progress on an issue.

o **From your specific point of view as a stakeholder responsible for (or active within) a specific sector (e.g. chemicals industry, labour, health system, agriculture, waste management, downstream user etc.): what are the key substantive elements of the beyond 2020 framework to realize these benefits and address challenges and gaps, including participation, responsibilities, programmes of work, tracking implementation progress and processes.**

• How could a possible ICCM5 HLD be best structured to convey the above-mentioned messages and commitments most effectively?

The following structure of the ICCM5 HLD could be considered:

1. Alignment of the chemicals and waste clusters with other multilateral agreements of relevance to provide solutions to the three converging crises of climate change, loss of biodiversity and pollution

Management of chemicals and waste is a cross-cutting issue. It should be viewed as key for solving several elements of the planetary crisis, e.g. biodiversity loss and resource depletion because toxicity considerations now limit the efficient use of already manufactured materials and products and is an obstacle to circularity and ending plastic pollution and climate change. In addition, chemicals and waste management is critical in addressing other global emergencies, such as health at a general level, food and energy security. All of these would be crucial to highlight in the High-Level Declaration to send a strong and clear message to the world leaders

that the topic of chemicals and waste must be significantly raised on the policy agenda at all levels.

2. Recognition of the gaps between the high and low to middle-income countries and their capacity to detect and analyze hazardous chemicals and the responsibility of producing and exporting countries

Insufficient legislation on chemicals and waste and its poor enforcement in low to middle-income countries, as well as the absence of harmonized standards for chemicals of global concern not covered by existing multi-lateral agreements, leads to unavoidable pollution and irreversible damage to people's health and the environment. At the same time, producing and exporting countries have a higher responsibility and accountability for damage and loss caused by industry in their countries. Exporting chemicals, which are banned in producing countries, to countries of the global South has to be stopped.

3. Acknowledgement of issues of concern (IoCs)

All Issues of concern (IoCs) should be acknowledged for their relevance to the Agenda 2030, and their function to provide an international forum to discuss them should be noted. However, it is essential to highlight that progress so far is mainly limited to information gathering, and only some concrete risk elimination or risk reduction measures have been undertaken. Even lead in paint -the IoC, which has received the most attention and funding to date - remains an issue in too many countries, mainly with developing and transition economies. The HLD must stress the urgent need to see substantial progress in the work with Issues of Concern (IoCs), which requires stepping up the IoC work considerably, primarily through higher ambition level in the voluntary actions under the SAICM successor, but not excluding through elevation of obligations outside its frames if progress is still insufficient in relation to the suggested criteria.

4. Globally harmonized transparency and traceability system

The HLD must admit that while for chemical elements and mixtures, the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) provides means for disclosing the identity of chemicals and hazard communication that supports informed decision-making, a corresponding harmonized system for disclosing chemicals in manufactured solid materials and products at the global level is missing [9]. This is a considerable obstacle to the realization of sound management of chemicals and waste in the context of material life cycles. The lack of information on chemicals in solid manufactured materials and products undermines the safety of the circular economy and its ability to address many SDG targets. A circular economy can be safe to human health and the environment only if all stakeholders along the value chains can make informed decisions based on information about the chemical composition of manufactured materials and products. Correct decisions can then be made for the design and manufacturing of products, including substitutions of problematic chemicals. Importers, retailers, institutions

involved in public procurements, and consumers can make informed decisions and handle waste correctly. Waste dealers, sorters and recyclers can make correct decisions to provide safe secondary raw materials. A toxic-free circular economy must build on transparency of information on toxic chemicals and their traceability in individual materials and products within the product lifecycles. It can reduce the need for new virgin raw materials and associated needs for energy, water and processing/refining chemicals in connection with extraction/production, refining of materials and manufacturing of products. Thereby, it could reduce climate impact, chemical pollution, water stress and other negative impacts on the ecosystems, and at the same time, address the waste issue. In summary, toxic-free circular economy would support fulfilling several key targets of the Sustainable Development Goals.

5. Highlighting the importance of synergy between the Beyond 2020 Chemicals Strategy and other existing and future MEAs.

Recognizing synergies between the chemicals and waste sector and other multilateral agreements, standards and activities in various areas such as health, agriculture, labour, biodiversity, climate and human rights is essential to promote sustainable development and ensure the well-being of people and the environment. For example, recognizing synergies between the chemicals and waste sector and agreements and standards related to health and agriculture can contribute to the safe management and use of chemicals, minimizing negative environmental impacts, safeguarding food safety, and reducing risks to human health and well-being. Existing chemical treaties provide limited coverage of the regulatory aspects related to the entire life cycle management of chemicals, making it challenging to effectively implement measures for the sound management of chemicals. Therefore, the synergy between the Beyond 2020 Chemicals Strategy and existing MEAs must be prioritized as it establishes a framework that functions as an umbrella mechanism.

6. Integrating the principles of green chemistry and non-chemical alternatives

The HLD should highlight the importance of integrating the principles of green chemistry and encourage the use of non-chemical alternatives in the Beyond 2020 instrument. It should promote establishing regulations that encourage the use of safe alternatives, providing incentives for research and development of safe technologies, and implementing green public procurement policies to create demand for environmentally friendly products.

7. Ensuring public engagement

Ensuring public engagement requires an inclusive occupational safety and environmental health approach. This can lead to encouraging public participation.

Engaging the public in the sound management of chemicals and wastes, including Indigenous and minority peoples, vulnerable groups and people at risk, is critical to support effective and sustainable community-based solutions and foster their ownership, accountability, and shared responsibility in addressing chemicals and waste issues. It enables the development of policies and practices that meet the needs and aspirations of various groups, including the most vulnerable, such as women, workers, and Indigenous Peoples, and consider their knowledge, experience, and needs while protecting human health, the environment and sustainable development.

8. Promote gender equality and justice

Ensuring women's equal and meaningful participation and representation in decision-making processes related to chemicals and waste management is crucial. The HLD must highlight the importance of involving women's organizations, Indigenous Peoples, Local Communities, and gender experts in chemical policy development, planning, and implementation to address women's specific needs, priorities, and perspectives, ensuring gender equality and women's empowerment, access to justice and application of the legal principle of Free Prior and Informed Consent to ensure that local communities have decision making and can protect against polluters on their territories.

9. Strengthening financial means of implementation

Sustainable financing is a keystone for effective implementation of the Global Plan of Action of the successor to SAICM, so the HLD must give a clear signal of the necessity to not just build on the Integrated Approach to long-term funding of the Chemicals and Waste Agenda, but also incorporate novel approaches to financing, e.g. a "global" fee leveraged from the chemical industry for basic chemicals following the polluter pays principle. The fee would replace the Responsible Care Programme, through which industry now largely controls what they fund, and thus may create situations where commercial interests primarily dictate the allocation of the funds.

10. Enabling framework for chemicals and waste

The HLD should stress the necessity of an enabling framework for chemicals and waste as a key supportive function to the SAICM successor. The UNGA decision should call all IGOs relevant for chemicals and waste management and health to make the Beyond 2020 framework central to their policies and programmes wherever they involve chemicals and waste.

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