

Chemicals Strategy for Sustainability

This paper was developed in the context of a stakeholder dialogue that followed our submission to the EU Commission's Roadmap consultation on the future Chemicals Strategy for Sustainability. It is meant to trigger an exchange of policy ideas or suggestions to inform the dialogue but does not constitute the agreed position of Cefic or its Members.

Supporting Global Chemicals Management

Issue

- People should feel safe, regardless of where they are in the world The EU chemicals industry remains committed to **enhance safe chemicals and waste management SCWM) globally through SAICM**. Next to in kind contributions, we also donate funding (currently €150K per year) to the SAICM secretariat.
- SAICM has successfully facilitated **cooperation between UN Environment and other international institutions and the European chemical industry**, with a particular focus on **capacity building in developing countries and countries in transition**, but there is still a long way to go.
- Despite many efforts, the **UN Globally Harmonized System for Classification and Labeling (GHS)** is still not implemented in each country and region. GHS is instrumental for establishing the foundation for national chemicals regulations. Similarly, there is room for improvement in making **Safety Data Sheets** the norm and in fostering **data sharing** (e.g. via like e-ChemPortal), as well as global harmonisation of testing and standards to avoid duplication.
- A successful chemicals legislation requires a close and regular cooperation between industry and governments. This has proven effective and this model should be maintained as developing countries continue to develop basic regulatory schemes.

Approach proposed and recommended actions

Ownership of SAICM objectives

We encourage SAICM to target its resources to those activities where it can achieve the biggest impact on SCWM. For example, a target could be 100% country coverage in implementation of the **GHS** and for all countries/regions to have in place and enforce **basic regulations** to manage chemicals and waste, including provisions for **fees and data generation and sharing**.

To further foster ownership of the SAICM objectives, and to track progress, Cefic supports the development of **tangible and measurable targets and objectives** that are based on the **Overall Orientation and Guidance (OOG)** elements to define progress towards implementation of the SDG's 2030 Agenda and encourages the inclusion of **concrete commitments to actions by key stakeholders** linked to the objectives and targets.

We recommend the EU Commission to strongly promote the above during the SAICM negotiations and to actively take part in the Virtual Working Group on Targets and Indicators where these objectives are now being negotiated. We believe that the EU Commission is best placed to advocate for mentoring programs to be established under SAICM and to connect EU Member States and stakeholders to developing

countries, **in particular in Africa**. A roadmap could be developed for each country, including a mechanism to ensure commitment by all stakeholders and reporting on progress.

Capacity Building

To increase the effectiveness and efficiency of the capacity building activities, several improvements are needed to ensure the long-term commitment of both the receiving country and the providing party to gradually build a chemical management system.

We propose for the creation of a” Capacity Building (CB) Clearinghouse” that would act as an intermediary between a country with capacity building needs and a donor country and/or other stakeholders that have resources available. Key objectives of such a CB Clearinghouse include:

- 1) Creating a single hub for collecting information on ongoing and proposed capacity building activities;
- 2) An adequate governance model: providing a mechanism, including supporting and decision-making facility, that links the resources and expertise available within developed countries, industry and other stakeholders to the needs expressed by developing countries.
- 3) Allowing for coordination at regional and local level, so that relevant partners in the region play a key role in executing the project (these can be local chemical industry associations, UNEP regional offices, the delegations of various developed countries and of NGOs).
- 4) Allowing for stages in the process, starting with smaller-scale, achievable SAICM objectives. For example, agreeing on a roadmap to implement GHS in country X in 2 to 3 years.
- 5) Ensuring that expertise and learnings from completed capacity building activities can be leveraged across other similar CB efforts, for example across neighboring countries or a region.

It is important to note that the CB Clearinghouse may very well be part of the global efforts done in other fora, including the **High Ambition Alliance (HAA)** lead by Sweden and Uruguay and the **“Global GHS Partnership”** lead by UNITAR/ILO/OECD.

We recommend the EU Commission to strongly voice -during the SAICM negotiations, HAA- and Global GHS Alliance talks, the need to make the capacity building efforts more efficient and effective. Establishing CB Clearinghouse is industry’s response to this challenge and the Commission could support this initiative by communicating this need to EU Member States. It is recommended to do a mapping of **EU Member States’ current capacity building activities**.

Promote the use of the UN GHS internationally as the preferred means for communicating on chemical hazards for workers and consumers

We recognise that the huge range of capacity, skills and knowledge needed to implement GHS in a jurisdiction is a barrier to its implementation. For this reason, all stakeholders (local governments, associations, civil society, etc.) should collaborate toward development of awareness, by raising the level of knowledge, and highlighting benefits which will eventually lead to the development of a legal framework enabling the implementation of GHS. The materialisation of the “Global GHS Partnership “during ICCM5 will be an important step forward and the Commission should take a leading role by providing training, sharing best practices, etc. in developing countries.

The chemical industry is already helping governments in South America, ASEAN and the Gulf to implement GHS by organising workshops and by the establishment of virtual working groups which “meet” regularly.

Include GHS implementation in trade agreements

we recommend including a provision on GHS implementation in the Trade and Sustainability Chapters (TSD) within the EU Free Trade Agreements (FTAs), that strongly encourages countries to implement UN GHS when trading with the EU.

Promote common standards and innovative risk assessment tools internationally

In a global environment, it is of great importance to align the requirements and assessments of various jurisdictions -when appropriate- to avoid redundant animal testing and harmonise results and chemicals assessments. Many countries are currently developing chemical regulations and there is an enormous amount of data and assessments already available, not least from REACH. In order to **better use, re-use and share these data**, we propose the following actions:

Global Adoption of OECD's Mutual acceptance of Data (MAD)

All countries should implement MAD principles. The OECD has already a procedure for non-OECD countries in order to comply with MAD. It helps to significantly reduce the number of (unnecessary) duplicative tests, especially on animals, and saves governments and chemical producers over EUR 309 million every year.

Promotion and further development of existing platforms

In order to further align and share all the existing information on chemicals among stakeholders, **global data platforms** such as the OECD's eChemPortal, IOMC, etc should be further developed, populated and promoted worldwide.

Promote and implement Regulatory Cooperation with countries outside the EU

Regulatory cooperation helps maintain high levels of protection for human health and the environment while promoting resource and cost savings for both governments and industry from the more efficient interaction of different regulatory regimes.

As the way forward, we should further promote and **pursue regulatory cooperation with both developed and developing countries** (currently, ECHA has MoUs only with developed countries or candidate countries to the EU) in order to increase efficiency, minimise duplication of effort and reduce costs for governments and industry. Concretely, all EU FTAs should include an annex for chemicals regulatory cooperation as already done by other developed countries (e.g. the USMCA FTA has such an annex).