

Dear Colleagues,

Attached please find IPEN comments on CiP Programme version 4. The CiP Programme has the central principle that all stakeholders (those along the supply chain and those outside it) should have relevant and reliable information to make informed decisions about chemicals in products. However, version 4 undermines this principle by enabling less disclosure and transparency, even for chemicals that pose risks to human health and the environment and needs adjustments to fulfill the CiP mandate.

In our view, the following key components should be addressed:

1) Health and safety information should not be regarded as confidential

Version 4 undermines this key chemical safety principle by confusing it with confidential business information (CBI). There is consensus agreement on the need for access to health and safety information in legally binding multi-lateral environmental agreements – and SAICM affirms it as well. UNEP should not allow any undermining of this key chemical safety principle.

The non-prescriptive character of the CiP Programme has been reiterated many times. Version 4, however, proposes a very prescriptive approach to stakeholder responsibilities in protecting CBI. Ironically, corporate competitors can easily analyze products to reveal their chemical contents – so insisting on CBI usually prevents consumers from getting the information, not corporate competitors. Besides, CBI claims may result in significant costs for businesses for not being transparent about the hazardous chemicals in their products.

2) There should be a unified approach to substantive CiP information release in all countries

Version 4 would create a patchwork of information release depending on the existence of national laws. That simply encourages double standards with good information release in countries with strong laws and poor information release in developing countries with non-existent or inadequate regulations. UNEP should not be encouraging less information availability to residents of developing countries.

3) There should be a unified list of hazardous chemicals based on the most stringent regulatory list to be used in all countries with a possibility to go beyond regulatory requirements

The proactive management of chemicals in products and supply chains that creates long-term value by staying ahead of regulatory and market demands is important. Version 4 instead encourages weak CiP initiatives and benefits companies that have a low level of ambition. UNEP should not support a process where companies alone decide the level of ambition with regard to the information disclosure that they will agree to provide.

IPEN believes that the CiP Programme should be an authentic process for moving forward on access to information. As there is no obligation for private sector stakeholders to participate, the CiP Programme should be ambitious enough to attract the leading edge of private sector participants. Version 4 does not fulfill this mission and this needs to be addressed to meet the Programme's mandate. IPEN remains committed to working with colleagues to make that happen.

Dr. Olga Speranskaya
IPEN Co-Chair
Eco-Accord chemicals/health policy lead
www.ipen.org
www.ecoaccord.org

@OlgaSperansk

Established in 1998, IPEN is currently comprised of 700 participating organizations in 116 countries. IPEN brings together leading environmental and public health groups around the world to establish and implement safe chemicals policies and practices that protect human health and the environment.

In addition, the letter and comments were approved by the following organisations:

"Armenian Women for Health and Healthy Environment"(AWHHE)

www.awhhe.am

"Khazer" Ecological and Cultural NGO, Armenia

khazer@nature.am

Ecological Society "Ruzgar", Azerbaijan

<http://ruzgar-ngo.org>

National Toxics Network, Inc., Australia

www.facebook.com/ntn

Center of Environmental Solutions, Belarus

www.ecoidea.by

Health & Environment Alliance (HEAL), Belgium

www.env-health.org

Centre de Recherche et d'Education pour le Développement (CREPD), Cameroon

<http://remineralize.org/tag/crepd/>

Canadian Environmental Law Association (CELA), Canada

www.cela.ca/

Chemical Sensitivities Manitoba, Canada

<http://mbeconetwork.org/members#CSM>

Pesticide Action Nexus Ethiopia

<https://www.facebook.com/pages/Pesticide-Action-Nexus-Association-PAN-Ethiopia/567764946687674>

ECOVISION, Georgia

<http://www.ecovision.ge/>

Women in Europe for a Common Future (WECF), Germany

www.wecf.org

BaliFokus Foundation, Indonesia

<http://www.balifokus.org/>

Center on Cooperation for Sustainable Development, Kazakhstan

www.csd-center.kz

Greenwomen, Kazakhstan

www.greenwomen.kz

Human Health Institute, Kazakhstan
hhikz.com

CSR Central Asia, Kazakhstan
<http://www.csr-ca.com/csr-central-asia/>

EcoMuseum, Kazakhstan
www.ecomuseum.kz

Toxic Action Network Central Asia, Kyrgyzstan
igorho2000@yahoo.com

Mountain club "Jabagly-Manas, Kyrgyzstan
jabagly-manas@mail.ru

Independent Ecological Expertise, Kyrgyzstan
www.eco-expertise.org

Public Association "Ekois-Bishkek", Kyrgyzstan
www.ekois.net

IndyACT, Lebanon
<http://www.indyact.org>

Red de Acción sobre Plaguicidas y Alternativas en México (RAPAM), Mexico
www.rapam.org

Pan African Vision for the Environment (PAVE), Nigeria
www.pavenigeria.org

Center for Public Health and Environmental Development (CEPHED), Nepal
www.cephed.org.np

Volgograd Ecopress, Russia
<http://vk.com/volgogradecopress>

Public Ecological Organization "Foundation to support civil initiatives", Tajikistan
www.fsci.tj

Association pour la Protection de l'Environnement et le Développement Durable de Bizerte (APEDDUB), Tunisia
najwa_bourawi@yahoo.fr

UNENGO MAMA-86, Ukraine
<http://www.mama-86.org.ua/index.php/en.html>

Centre for International Environmental Law (CIEL), USA
www.ciel.org

