

Environment and health (chemicals and waste section)

1. Overall, the political priority of chemical safety is low, including at the national level. UNEA3 should request the Executive Director to support efforts to raise the political priority of chemical safety at all levels, including the national level.
2. UNEA3 should raise the importance of addressing the relationship between women and chemical safety, noting the differing unique time periods of sensitivity; different physiology and its impact on effects; lack of gender disaggregated data on exposures and impacts on women; different types of occupational exposures; and the limited decision-making power of women on issues related to chemical safety.
3. The preamble should highlight the human rights and quality of life implications of pollution; “*Recognizing* that pollution contributes to and aggravates environmental challenges which have adverse effects on the full enjoyment of human rights, including the right to the highest attainable standard of health; the right to life; the right to an adequate standard of living; the right to food; and the right to water and sanitation.”¹
4. The resolution preamble should contain an explicit reference to the importance of public access to information; “*Reaffirms* the importance of public access to, and wider availability of information relating to the environment; as well as effective participation of the public - in particular of groups most exposed to pollution - into relevant decision making, to empower communities to contribute to meaningfully address the sources and impacts of pollution; and prompt and effective access to judicial remedies;”
5. The preamble should make explicit reference to the cost of inaction; “*Further requests* all member states, UN Environment, WHO, FAO, ILO and other relevant UN agencies, to collaborate actively to increase data on the cost of inaction in relation to health and environmental policies, so as to highlight the true cost of pollution in all sectors.”
6. The list of organizations for close collaboration with the UNEP ED on the environment and health nexus should also include ILO (preamble para 4).
7. The methods, tools and guidelines developed by UNEP and WHO should make specific reference to prioritizing prevention of harm, and not just developing tools for an acceptable level of harm (para 5).
8. The chemicals and wastes operative section should include a statement about human rights; “*Recognizes* that unsound management of chemicals and waste contributes to and aggravates environmental challenges which have adverse effects on the full enjoyment of human rights including the right to the highest attainable standard of health.”
9. The reference to chemicals in products should also include the importance of making information about chemicals in products publicly available to allow better consumer choice and to avoid the recycling of toxic chemicals into new products to ensure safe recycling and sound waste management. (para 8)
10. Specific references to trademarked programs of the chemical industry should be deleted. This includes deleting references to Responsible Care and the Global Product Strategy (para 10).
11. The call on private sector actors in the resolution should specifically include a reference to Rio Principle 16, the need for the chemical industry to internalize its costs, and the need for cost recovery mechanisms for infrastructure and enforcement relating to sound chemicals management (para 10).
12. The proposed report on the environmental and health impacts of pesticides and fertilizers should include information on pesticides classified as hazardous under conditions of ordinary use. The report should also contain guidance on safer alternatives to highly hazardous pesticides with priority given to agroecological alternatives as noted in the SAICM ICCM4 resolution (para 11).
13. The proposed report on environmental and health impacts of pesticides and fertilizers should include the UN Special Rapporteur on Right to Food as a principal collaborator (para 11).
14. UNEA3 should request the ED of UNEP to present a detailed report on the costs of unsound management of chemicals and waste and their impact on the health and development agenda in collaboration with WHO, FAO, ILO and other relevant organizations by UNEA4 in 2019.
15. UNEA3 should invite the Director General of WHO to assume a leading role in SAICM and provide appropriate staff and other resources to its secretariat, and request the Executive Director to forward this invitation to the next meeting of the Executive Board of WHO.
16. The chemicals agenda is severely underfunded but this topic is absent in the current draft resolution. UNEA3 should note the need for widening the donor base and predictable, adequate, and sustainable funding for implementation of the chemicals conventions and SAICM in a manner consistent with documented needs.²

¹ Ostrava Declaration of the Sixth Ministerial Conference on Environment and Health

http://www.euro.who.int/_data/assets/pdf_file/0007/341944/OstravaDeclaration_SIGNED.pdf?ua=1

² For example, Stockholm Convention COP6 estimates of needs for 2015 – 2019 period identified in NIPs are \$1.9 billion USD (UNEP/POPS/COP.6/INF/20). This estimate did not include costs associated with the 16 new POPs. Since GEF6 funding remains the same there is at least a 5-fold difference between Stockholm Convention needs and funding for this period.

17. UNEA3 should request UNEP to support capacity building for youth on chemical safety.
18. Current resolution text that should be retained includes:
 - a. *Reaffirms* the importance of applying the precautionary principle when there is a lack of scientific certainty and where there are threats of serious or irreversible damage
 - b. *Also underlines* the importance for human and environmental health of avoiding or minimizing the presence of harmful chemicals in products, which through the use of the products and their disposal as waste may negatively affect humans and biodiversity and hamper reuse and recovery, including recycling

Eliminating lead paint

1. This should remain as a stand-alone resolution to maximize the global effort to eliminate lead paint.
2. Current resolution text that should be retained includes:
 - a. *Emphasizing* that no level of exposure to lead is considered safe,
 - b. *Recognizing* the need for progress in all regions toward addressing sources of lead exposure,
 - c. *Recommends* a focus on establishing national lead paint laws as an immediate practical step toward eliminating lead exposure,
 - d. *Encourages* Member States to establish and enforce binding national laws, regulations and policies to eliminate lead paint in order to remove the risks such paints pose, especially to infants and children
 - e. *Requests* the Executive Director, within available resources, to:
 - c) Continue to develop and host regional workshops to promote binding national laws, regulations and policies to eliminate lead paint and share information regarding the dangers posed by lead paint
 - e) Assist the Alliance to meet the goal of phasing out lead paint globally.
3. The Acknowledgment of the significant progress of the Global Alliance to Eliminate Lead Paint should include all stakeholders; “demonstrating that with concerted action and commitment by all stakeholders the elimination of lead paint in the short-term can be achieved.”

Plastic pollution

1. The resolution on marine litter and microplastics should be broadened to address “Plastic pollution.”
2. UNEA3 should support the creation of an Ad Hoc Open-Ended Working Group (AHOEWG) on plastic pollution with a mandate to consider options to strengthen international governance structures to reduce and eliminate plastic pollution from all sources.
3. The AHOEWG should examine the range of available response measures and strategies, the feasibility and effectiveness of various approaches, both voluntary and legally binding, to address current gaps to reduce and eliminate plastic pollution, and implementation challenges and options for improvement.
4. The AHOEWG should consider the need for capacity-building, technical assistance and technology transfer, and cost internalization by the relevant industries.
5. The AHOEWG should prepare a final report including recommendations for a stronger global architecture with a multi-layered approach to reduce and eliminate plastic pollution, and present it for the consideration of UNEA4.
6. The resolution preamble should replace marine litter and microplastics with plastic pollution; “Noting with concern the high and rapidly increasing levels of plastic pollution...” “*Noting also with concern* that plastic pollution can contribute to the spreading of toxic chemicals/hazardous substances...” “*Noting with appreciation* the broad international recognition of the urgent need for action at many levels to prevent further damage caused by plastic pollution...”
7. The resolution preamble should note with concern the planned increase in plastic production in the next 5 years and that plastic pollution can be most efficiently addressed at the front end of plastic production.
8. The long-term goal should be broadened; that ecosystems and the human activities dependent on them are not negatively affected by plastic pollution.” (para 1)
9. The most cost-effective measures should not be used if harmful to human health or the environment; “*Stresses* that prevention of plastic pollution is key and that waste prevention should be prioritized; that the most environmentally sound non-combustion measures should be used recognizing that there are already existing solutions and effective measures that can be locally and regionally adapted” (para 6).
10. *Recognizes also* the need to develop an integrated approach against plastic pollution from all sources (para 8).
11. Private sector responsibility needs to be clearly addressed; “*Underlines* the responsibility of plastic producers/importers and packaging firms to reduce and eliminate plastic pollution by ending the production of single-use plastics and implementing extended producer responsibility schemes as well as providing information on, adverse effects caused by their products.”
12. Current resolution text that should be retained but modified to include plastic pollution includes: *Recognizes* the important contribution of the civil society, including non-governmental organizations, to prevent and reduce plastic pollution; and *urges* cooperation between governments, private sector and civil society, on information sharing, awareness raising, capacity building and clean-up actions.

Investing in innovative environmental solutions

1. The resolution uses the word “sustainable” and “sustainably” throughout the resolution but does not define or indicate its meaning. This opens the door to all kinds of conventional polluting technologies to be simply repackaged as “sustainable” and contribute to further environmental degradation and harm to human health and the environment in developing and transition countries. The term, “ecologically sustainable”, places the focus on protecting human health and the environment.
2. The preamble could more comprehensively address energy and agriculture by stating, “in areas such as wind and solar energy, agroecological approaches...”
3. The preamble should prioritize preservation and protection of natural resources and ecosystem services.
4. Examples of innovative solutions in the preamble should include wind, wave and solar energy, agroecology, clean production with substances of low hazard, non-combustion methods of waste destruction, industrial design that only produces recyclable or compostable products, segregation of organic waste from the waste stream with anaerobic digestion and biogas energy generation, and composting.
5. Innovative environmental measures should include wind, wave and solar energy, agroecology, clean production with substances of low hazard, non-combustion methods of waste destruction, industrial design that only produces recyclable or compostable products, segregation of organic waste from the waste stream with anaerobic digestion and biogas energy generation, and composting (para 5).

Promoting Environmentally Sound Management of Used Lead Acid Batteries (ULABs)

1. The preamble expression of deep concern should note the health and environmental impacts of lead-acid battery recycling; “*Deeply concerned* about the health and environmental impacts from lead-acid battery recycling, in particular in developing countries, where there is a lack of adequate infrastructure needed to safely recycle the rapidly growing number of used lead-acid batteries in an environmentally sound manner.”
2. It would be useful to encourage standards in a new point: “Develop, implement and enforce binding minimum standards for ULAB recycling.”
3. The resolution should strengthen national efforts; “Develop national strategies, inter alia, by encouraging mandatory purchase discounts or deposits to ensure extended producer responsibility to collect lead-acid batteries” (para 2).
4. “Cooperate in encouraging mechanisms to consolidate used lead-acid batteries...” (para 2).
5. It would be useful for the UNEP ED to assist with collection of information: “Supporting the collection of information on handling and management of used lead-acid batteries in developing countries and countries with economies in transition by relevant stakeholders (para 3).
6. Relevant organizations could assist with technical training: “Encouraging and sponsoring technical training, including the use of peer-to-peer courses utilizing specialized staff from environmental agencies and relevant organizations to work with counterparts in low and middle-income countries (para 3).
7. Current resolution text that should be retained includes:
 - a. Fostering dialogue with governments to help usher in more comprehensive regulatory frameworks to bring needed improvements to the industry.
 - b. Providing capacity-building, with a multi-sectoral and multi-stakeholder approach in developing countries, in particular least developed countries, to implement regulatory frameworks and programmes for the recycling of waste lead-acid batteries.
 - c. Encouraging international cooperation for the development of tracking systems to trace shipments of used lead acid batteries from generators to recycling facilities abroad through a system that is transparent with public reporting on government websites.
 - d. Helping to develop and promote independent third-party certification for lead battery recycling plants that is based on industry-specific measures of quantifiable performance targets to encourage verifiable improvements.
 - e. Coordinating a multi-stakeholder group to develop lending guidelines outlining minimal environmental and occupational standards for lead acid battery recycling facilities and then working with private and multilateral lending institutions to adopt the resulting guidelines to be incorporated into lending policies and underwriting standards.

Water pollution

1. The preamble should include concerns about chemicals and plastics pollution; “*Highly concerned* about threats to water quality from pollution on both land and sea across the globe, and that water-related ecosystems sustain and bear the brunt of the impacts of human activities such as urbanization, chemical and plastics use in increased industrial and agricultural activity and poor sanitation...”
2. The preamble should include concerns about contamination of fish and seafood; “*Highly concerned* about chemicals, metals, and plastics contamination of fish and seafood, particularly for island and coastal communities where this represents a major protein source.”
3. Monitoring should include fish and seafood; “Encourages designing of water quality and seafood monitoring schemes, capacity development to developing countries that wish to establish monitoring programmes and conduct assessments of water and seafood quality” (para 3bis).

4. Toxicological tests should also include contamination; “*Invites* Member States to establish programs for the intercalibration of toxicological tests for chemicals, metals, and plastics and bioindicators for water and seafood quality in bodies of water, in order to standardize their application” (3 quat).
5. Public access to information should be broadened; “*Invites* Member States to enhance public access to information on chemicals, metals, and plastics contamination of seafood and water quality requirements for different water uses to promote safe and efficient food sources and water use” (para 4).
6. Best practices should be broadened; “*Further invites* Member States and other stakeholders, including government labs, the private sector, academia, and civil society, to collaborate and share best practices on data collection and monitoring of chemicals, metals, plastics and other indicators that will be useful for reporting on water and seafood quality and addressing water pollution” (para 5).
7. Agroecology should be included in regional platforms; “*Also invites* Member States, in collaboration with relevant stakeholders, private sector, industry, academia, civil society, and the GPA, including through encouraging regional platforms for wastewater and management of nutrients and advancing agroecological techniques, to help prevent and mitigate water pollution and to protect and restore water-related ecosystems in order to minimize adverse impacts on human health and the environment (para 6).
8. Agroecology should be included in national policies; “*Encourages* Member States, in collaboration with United Nations Environment Programme and the Food and Agriculture Organization, to develop and implement agroecology to reduce and eliminate pesticide pollution and policies that relate to integrated water resources management and invest in the protection and restoration of water-related ecosystems, so as to prevent and reduce pollution and maintain or improve ecosystem health” (para 7).
9. Transboundary pollution should include chemicals and metals; “*Urges* UN Member States to engage in cooperation to reduce transboundary metals and chemicals pollution of water and raise awareness for the benefits of transboundary cooperation, as well as related agreements and joint bodies. UN Environment and other relevant UN Organisations should facilitate such cooperation through fostering exchange of experience and providing assistance” (9bis).
10. Chemicals and metals pollution should be part of the requests to the UNEP Executive Director (para 10).
 - c. “Continue to develop tools to support countries upon request, in their efforts to address water pollution due to chemicals, metals, plastics and other sources and ecosystem health...”
 - d. “Work with relevant international organisations, including through UN-Water, to address issues related to water pollution and chemical contaminants and build upon the 2016 Snapshot of the World’s Water Quality, including assessments of pharmaceutical, chemical, metal and plastic contaminants and severe levels of pathogens in water bodies and proposed solutions, policies and technologies.”
 - e. “Compile and share information on the analytical and technical requirements for water quality testing for plastic, metal and chemical contaminants (including new and emerging pollutants) that may impact human and environmental health.”
 - g. “Support Member States, as appropriate, in developing programmes that invest in agroecology and the management of land and ecosystems to prevent pollution of water sources, in order to ensure the availability of quality water in a sustainable manner for all uses.”
 - h. “Work with governments and relevant stakeholders, including the private sector in creating an enabling environment for addressing water pollution including reducing and eliminating releases of plastics, metals and chemicals, implementation of agroecology techniques, and sustainable wastewater management, which encompasses supportive policies, laws and regulations, tailored technologies and innovative financial mechanisms.”