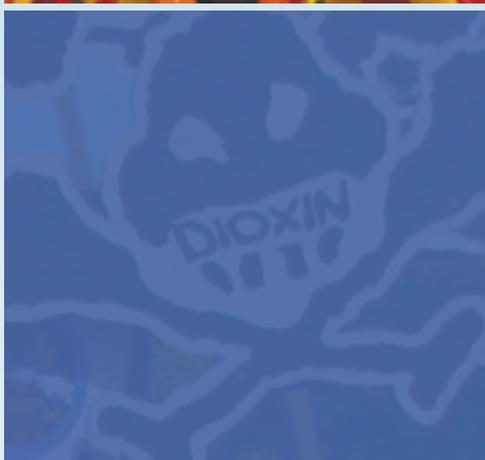


CITIZENS' REPORT

Global Outreach Campaign on the Strategic Approach to International Chemicals Management (SAICM)



Prepared by

IPEN[®]

INTERNATIONAL POPs
ELIMINATION NETWORK



ON THE COVER:
Youth performers parade on streets to raise community awareness on the
chemical and health hazards of open burning. (Credit: Gigie Cruz, GAIA)

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List of Acronyms

BAT	Best Available Techniques
BEP	Best Environmental Practices
CEE	Central and Eastern Europe
CMR	Carcinogen, Mutagen and Toxic to Reproduction
CSO	Civil Society Organization
DDT	Dichloro-Diphenyl-Trichloroethane
EECCA	Eastern Europe, Caucasus, and Central Asia
ESTIS	Environmentally Sound Technology Information System
EU	European Union
FAO	United Nations Food and Agriculture Organization
GAIA	Global Alliance for Incinerator Alternatives/Global Anti-Incinerator Alliance
GEF	Global Environment Facility
GHS	Globally Harmonized System of Classification and Labeling of Chemicals
GPA	Global Plan of Action
HCWH	Health Care Without Harm
ILO	International Labour Organization
IPEN	International POPs Elimination Network
ISDE	International Society of Doctors for the Environment
IPM	Integrated Pest Management
MDG	Millennium Development Goals
NGO	Nongovernmental Organization
OPS	Overarching Policy Strategy
PAN	Pesticide Action Network
PBT	Persistent, Bioaccumulative and Toxic Substance
PCB	Polychlorinated Biphenyl
POP	Persistent Organic Pollutant
PRTR	Pollutant Release and Transfer Register
REACH	Registration Evaluation Authorization and Restriction of Chemicals
SAICM	Strategic Approach to International Chemicals Management
UNEP	United Nations Environment Programme
WECF	Women in Europe for a Common Future
WFPHA	World Federation of Public Health Associations
WHO	World Health Organization

Executive Summary

NGO Contributions to SAICM Implementation: Global Outreach Campaign

Public interest non-governmental organizations (NGOs) and civil society organizations (CSOs) have important roles to play in successful SAICM implementation. The SAICM Overarching Policy Strategy (OPS) addresses the need for a “multi-stakeholder approach in pursuing the sound management of chemicals,” and asserts the need to “promote and support meaningful and active participation by all sectors of civil society, particularly women, workers and indigenous communities, in regulatory and other decision-making processes that relate to chemical safety.”¹ Six international NGO networks² have registered as SAICM NGO focal points and are working together actively to promote SAICM implementation efforts by their constituent NGOs in all regions. However, despite these efforts, many NGOs around the world are still unaware of SAICM and lack the necessary resources and capacity to participate as effective stakeholders.

To promote effective SAICM participation and undertake enabling activities for NGOs and CSOs in developing and transition countries, these six international NGO networks have developed a joint SAICM NGO Global Outreach Campaign with the following elements:

- **Global mini-grant program:** The project supported the execution of 51 activities in 36 developing and transition countries to raise awareness of SAICM and to implement activities related to SAICM objectives. Examples of activities include organizing multi-stakeholder events with government, industry and public interest representatives to raise awareness of SAICM; training on pesticides and education about less hazardous alternatives; creation of a public web site on chemical safety issues; promotion of zero waste approaches to waste management; and production of a report on international trade of toxic substances.
- **Educational booklets:** The campaign is producing a series of educational booklets designed to help build NGO awareness about threats to public health and the environment from toxic chemical exposure, and to help build NGO capacity to address these threats. The campaign focused on four booklets: NGO Guides to SAICM, POPs, Hazardous Pesticides, and Heavy Metals, with the aim of translating the booklets into the six official UN languages.
- **Global Citizens’ Report:** This report describes the state of SAICM implementation in developing and transition countries from the perspectives of public interest NGOs and CSOs. It documents progress, and points to directions where more work is needed. It also provides a sample of the work of public interest NGOs and CSOs to protect human health and the environment from hazardous chemicals in line with SAICM objectives.

We have documented more than 300 activities conducted by public interest NGOs that relate to SAICM implementation.⁵ The activities include work on 68 of the 273 items in the Global Plan of Action (GPA) and all five principal Overarching Policy Strategy (OPS) Objectives: risk reduction, knowledge and information, governance, capacity building, and illegal traffic. Interventions have ranged from local activities to national and international work. These activities cover a wide variety of issues including: education and awareness, alternative practices in agriculture and waste management, outreach to the health and labor sectors, policy recommendations such as removing lead in paint or development of legal frameworks for chemical regulation, and convening of stakeholders from all sectors, including industry and government. The trade union sector has also contributed by conducting seminars and courses on chemical management to increase worker capacities to work more safely with hazardous chemicals, such as identification of chemicals used in the workplace, risk assessment, and assistance in the implementation of preventive measures.

NGOs will continue contributing to chemical safety objectives within the limitations of available resources. International NGO networks will continue to encourage this by linking efforts and providing expertise and resources. Thanks to the initial donors, this post ICCM-1 NGO Campaign has been very successful, and has provided a solid base to build on. Additional resources to continue and expand these joint programs on SAICM outreach and implementation will build NGO capacity and greatly advance the SAICM 2020 goal.

NGO Views of SAICM Implementation

Since 2006, SAICM implementation has advanced, but the pace has been slow and uneven, and it does not appear that the global community is yet on track to achieve SAICM's 2020 objective. The SAICM High Level Declaration signals that chemical safety should become an important part of national policy. Some countries have moved forward to form inter-ministerial committees with multi-stakeholder participation, name national focal points, survey chemical use, and develop plans for implementation. At the regional level, Africa, Central and Eastern Europe, and Latin America and the Caribbean have all developed multi-stakeholder coordination committees to facilitate regional SAICM implementation. More needs to be done.

An important part of SAICM's significance lies in the fact that it reflects high-level agreement that the sound management of chemicals is *“essential if we are to achieve sustainable development including the eradication of poverty and disease, the improvement of human health and the environment and the elevation and maintenance of the standard of living in countries at all levels of development.”*⁶ This link between chemical safety and sustainable development has not yet been fully reflected in the funding decisions of bilateral development assistance cooperation agencies, and it needs to be strengthened. Developing and transition countries need to do more to fully integrate SAICM objectives into national budgets and development assistance cooperation. Donors need to recognize and encourage the inclusion of chemical safety objectives as important elements of aid cooperation in support of sustainable development.

SAICM financing remains insufficient and unsustainable. Possible donor interest in developing a new *Chemicals Management* focal area in the Global Environment Facility with additional funding is welcome, but there has not yet been a commitment to realize this. The resources that have been available through the Quick Start Programme Trust Fund have been very modest and only one project per country has so far been permitted. Some countries have utilized the Quick Start Programme to finance SAICM activities, while others have not done so. Finally, the Quick Start Programme is a time-limited program, and there has been too little progress in the development of a more permanent funding mechanism to replace it.

Public awareness of chemical safety issues remains low. Inclusion of public stakeholders in relevant decision-making processes has been uneven. In some countries, there is good participation of all stakeholders; in others, information flow has been one way from government to other stakeholders; and in others there is little interaction between the government and public stakeholders. Some gaps in SAICM implementation include:

- Weak and unbalanced engagement of stakeholders in the development of chemicals management strategies at the national level, including NGOs, women's and children's advocacy groups, indigenous communities, trade unions, and grassroots social organizations;
- Need for more financial, technical and capacity support to public interest NGOs and CSOs to enable and facilitate their responsible and active participation in SAICM implementation;
- Insufficient human and technical capacity for implementing SAICM and monitoring results on the part of governments, domestic industries, and national NGOs and CSOs;
- Low level of public awareness about SAICM and about chemical safety issues in general;
- Insufficient and unavailable information on chemical safety issues, including insufficient labeling and a lack of information about potentially hazardous chemicals in products, including electronic waste, nanomaterials, and production and use of asbestos-containing products;
- Insufficient research and promotion of alternatives to chemical pesticides in agriculture and health, including alternatives to the use of DDT for malaria control;

- Inadequate waste management, incineration of municipal, industrial, and medical waste, uncontrolled open burning of waste, and low implementation of zero waste approaches;
- Slow and non-transparent clean-up of contaminated sites and obsolete pesticides, and continued accumulation of toxic waste;
- Lack of sufficient legislation to require producers and importers to improve the safety of their products, and insufficient political will or public demand to tighten control; inspection and vigilance of existing regulations; poorly regulated emissions of toxic chemicals;
- Lack of a permanent and sustainable SAICM financial mechanism including the internalization of costs;
- Absence in many countries of multi-stakeholder and inter-ministerial coordination committees;
- Insufficient commitment to basic principles such as the precautionary and polluter pays principles, no data, no market, public right to know, and progressive substitution of the most dangerous chemicals;
- Inadequate progress in the ratification and implementation of key chemical conventions such as the Stockholm Convention, Rotterdam Convention, and the Basel Convention, including the Ban Amendment.

Since 2006, SAICM implementation has advanced, but the pace has been slow and uneven. Overall, SAICM implementation needs a sustainable financial mechanism and strong links to sustainable development. In the SAICM Dubai Declaration, governments acknowledged that public health and environmental NGOs, trade unions and other civil society organizations have made important contributions to promoting chemical safety, and they stated their intent to engage actively in partnerships with civil society in SAICM implementation. This requires financial resources to build NGO capacity and to support SAICM activities so that the commitment of civil society to chemical safety can be harnessed to accomplish the 2020 goal.

Conclusion

The SAICM Global Outreach Campaign and parallel efforts have helped broaden the awareness of SAICM in all regions. More than 1,000 public interest NGOs and CSOs in over 100 countries have pledged to help implement SAICM to achieve its objectives. NGOs and CSOs have implemented over 300 activities from the local to the international level to promote chemical safety. Over 70 national and regional Public Health Associations and schools of public health have taken note of SAICM and agreed to contribute to its implementation. International and national trade union federations are also encouraging their members to contribute to SAICM implementation. The *NGO/CSO Global Common Statement on SAICM* has been a very useful tool in these efforts.

Introduction to the Global Outreach Campaign

The Strategic Approach to International Chemicals Management (SAICM) brings together governments, industry, and civil society in a common effort to achieve the 2020 goal: a world where chemicals are produced and used in ways that lead to the minimization of significant adverse effects on human health and the environment.⁷ As the SAICM High Level Declaration states: “The sound management of chemicals is essential if we are to achieve sustainable development, including the eradication of poverty and disease, the improvement of human health and the environment and the elevation and maintenance of the standard of living in countries at all levels of development.”⁸

Public interest non-governmental organizations (NGOs) and civil society organizations (CSOs) have important roles to play in successful SAICM implementation. The SAICM Overarching Policy Strategy (OPS) (§9) addresses the need for a “multi-stakeholder approach in pursuing the sound management of chemicals,” and asserts that “there is a need to promote the role of all sectors of civil society and the private sector in the implementation of the Strategic Approach.” An OPS governance objective (§16 g) is to “promote and support meaningful and active participation by all sectors of civil society, particularly women, workers and indigenous communities, in regulatory and other decision-making processes that relate to chemical safety.” An OPS capacity building objective (§17 g) is to “encourage stakeholders to develop and promote programmes on chemical safety.” Additionally, OPS §22 states: “Implementation of the Strategic Approach could begin with an enabling phase to build necessary capacity, as appropriate, to develop, with relevant stakeholder participation, a national Strategic Approach implementation plan, taking into consideration, as appropriate, existing elements such as legislation, national profiles, action plans, stakeholder initiatives and gaps, priorities, needs and circumstances.”

The SAICM Outreach Campaign is a global effort to undertake enabling activities for NGOs and CSOs. In January 2008, six international networks of public interest and civil society organizations came together and developed a common global campaign to expand civil society awareness that toxic chemical exposure represents a real and growing threat to public health and the environment.⁹

The Campaign included outreach efforts aimed at more than 1,000 NGOs and CSOs in more than 80 developing and transition countries in line with the objectives of the SAICM OPS and proposed activities of the Global Plan of Action (GPA).

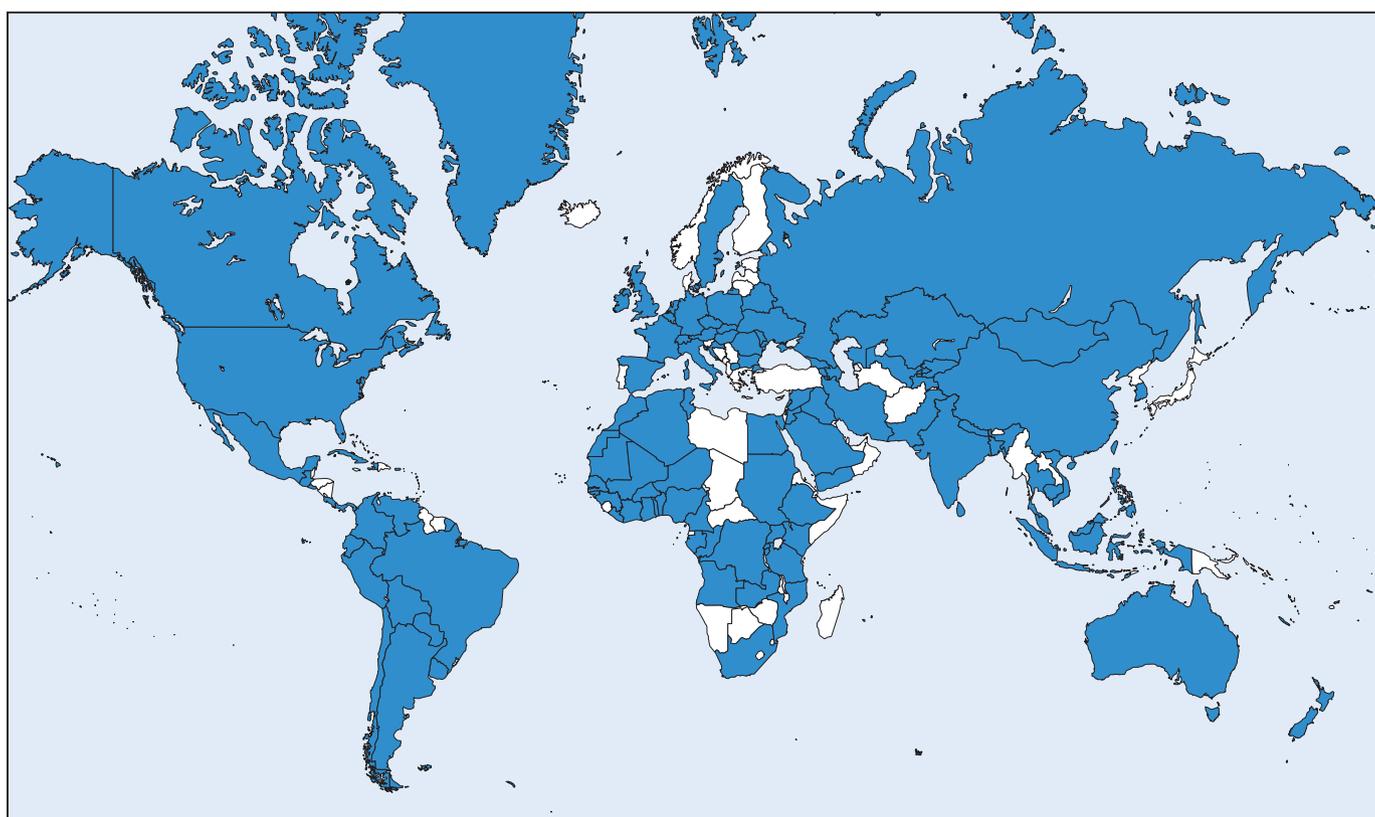
Campaign Objectives and Participants

One fundamental objective of the Campaign has been to greatly expand the numbers of NGOs and CSOs contributing to SAICM implementation in all developing and transition country regions, and to also expand the potential effectiveness of such contributions.

The activities and results of the SAICM Outreach Campaign include:

- **Common Statement in support of the SAICM process**¹⁰: The Common Statement has been translated into all UN languages (as well as several others) and has been endorsed by over 1,000 organizations in more than 100 countries.¹¹ The Common Statement has been used as a campaign tool to help raise chemical safety awareness within the targeted organizations and their constituents and to secure pledges of their active support for national and local chemical safety efforts. An additional objective has been to bring new organizations into the SAICM arena, such as health and trade union groups.
- **Implementing a global mini-grant program**: These activities have supported 51 grants for NGO and CSO engagement in chemical safety activities in 36 developing countries or countries with economies in transition to raise awareness of SAICM objectives, and to implement small programs related to the SAICM OPS and GPA objectives. Activities included organizing multi-stakeholder events with government, industry and public interest representatives to raise awareness of SAICM; training on the safe use of pesticides and education about less hazardous alternatives; creation of a public web site on chemical safety issues; a study of the use of POPs chemicals among informal sector mattress manufacturers; promotion of zero waste approaches to waste management; and production of a report on international trade of toxic substances.

Countries Where Public Interest Organizations Have Endorsed the Common Statement on SAICM



Algeria	Cuba	Kyrgyzstan	Rwanda
Angola	Czech Republic	Lebanon	Saudi Arabia
Argentina	Democratic Republic of the Congo	Liberia	Senegal
Armenia	Ecuador	Macedonia	Singapore
Australia	Egypt	Malaysia	Slovakia
Austria	El Salvador	Mali	South Africa
Azerbaijan	Ethiopia	Mauritania	Spain
Bahrain	France	Mauritius	Sri Lanka
Bangladesh	Gabon	Mexico	Sudan
Belarus	Gambia	Moldova	Sweden
Belgium	Georgia	Mongolia	Switzerland
Benin	Germany	Morocco	Syria
Bolivia	Ghana	Mozambique	Tajikistan
Brazil	Guatemala	Nepal	Tanzania
Burkina Faso	Guinea	Netherlands	Thailand
Burundi	Guinea Bissau	New Zealand	Togo
Cambodia	Haiti	Niger	Tunisia
Cameroon	Hungary	Nigeria	Uganda
Canada	India	Pakistan	Ukraine
Chile	Indonesia	Palestine	United Kingdom
China	Iran	Panama	United States
Colombia	Iraq	Paraguay	Uruguay
Comores	Ireland	Peru	Uzbekistan
Cook Islands	Italy	Philippines	Venezuela
Costa Rica	Jordan	Poland	Vietnam
Cote d'Ivoire	Kazakhstan	Republic of the Congo	Yemen
Croatia	Kenya	Romania	Zambia
	Korea	Russia	

- **Creating educational booklets¹²:** These materials help build awareness about the severe threats to public health and the environment that occur as a result of toxic chemical exposure. The educational materials also describe SAICM and the need to take action in support of sound chemicals management consistent with the SAICM OPS and GPA. Topics for the booklets include:
 - *SAICM*
 - *Persistent Organic Pollutants*
 - *POPs Pesticides*
 - *Heavy Metals*
- **Creating this global Citizens' Report:** This report describes the state of SAICM implementation in developing and transition countries from the perspectives of public interest NGOs and CSOs. It documents progress, and points to directions where more work is needed. It also provides a sample of the work of public interest NGOs and CSOs to protect human health and the environment from hazardous chemicals in line with SAICM objectives. NGOs and CSOs have worked on 68 of the 273 items in the GPA and all five principal OPS Objectives: risk reduction, knowledge and information, governance, capacity building, and illegal traffic.

The Campaign brings together the following international networks:

- Health Care Without Harm (HCWH)¹³;
- International Persistent Organic Pollutants (POPs) Elimination Network (IPEN)¹⁴;
- International Society of Doctors for the Environment, (ISDE)¹⁵;
- Pesticide Action Network International (PAN)¹⁶;
- Women in Europe for a Common Future (WECF)¹⁷;
- World Federation of Public Health Associations (WFPHA)¹⁸.

In addition, the Campaign has reached out to organizations of workers via Sustainlabour¹⁹, an organization created by trade unions to promote sustainable development issues among its members.

SAICM in Developed Countries

The SAICM Outreach Campaign and this report focus on developing countries and countries with economies in transition. This should not imply that developed countries have already met the 2020 goal. Some developed countries appear to view SAICM as an issue only for developing and transition countries despite agreeing to the Strategic Approach in Dubai. In fact, in a number of developed countries there remain significant gaps in implementing SAICM and considerable work is still needed to achieve the SAICM goal. This appears to reflect a low political priority on SAICM implementation and few actions to ensure the implementation of the OPS and GPA in their own countries.

Many developed countries have not yet established inter-ministerial coordination committees as recommended by the SAICM agreement, and there is a serious lack of public awareness or involvement in SAICM national implementation. In many developed countries, workers and the public still cannot access adequate information on toxic chemicals, their impacts and where and how they are used. Industrial and agricultural workers in particular continue to suffer serious and irreversible impacts of toxic chemicals. Research into alternatives to chemical pesticides in agriculture is not well supported nor are there sufficient policies and programs to promote safe and effective alternatives and substitutes to persistent, bioaccumulative, and toxic substances (PBTs) as called for in the SAICM GPA. Ironically, some developed countries have some of highest levels of PBT contamination in their human populations in the world.

SAICM cannot be viewed as a process by which only developing and transition countries improve chemical management. All signatory countries of SAICM made a firm commitment in Dubai that the sound management of chemicals is essential to achieve sustainable development and that concerted actions need to be taken to reach the 2020 goal.

SAICM Financing and Sustainable Development

An important part of SAICM's significance lies in the fact that it reflects high-level agreement that the sound management of chemicals is *"essential if we are to achieve sustainable development including the eradication of poverty and disease, the improvement of human health and the environment and the elevation and maintenance of the standard of living in countries at all levels of development."*²⁰ This link between chemical safety and sustainable development has not yet been fully reflected in the funding decisions of bilateral development assistance cooperation agencies, and it needs to be strengthened. Developing and transition countries need to do more to fully integrate SAICM objectives into development assistance cooperation. Donors need to recognize and encourage the inclusion of chemical safety objectives as important elements of aid cooperation in support of sustainable development.

SAICM financing remains insufficient and unsustainable. Possible donor interest in developing a new *Chemicals Management* focal area with additional funding is welcome, but there has not yet been a commitment to realize this. The resources that have been available through the Quick Start Programme Trust Fund have been very modest and only one project per country has so far been permitted. Some countries have utilized the Quick Start Programme to finance SAICM activities, while others have not done so. Many countries have not yet committed additional national funds for SAICM implementation in their budgets or addressed SAICM objectives in their appeals for financial assistance. Finally, the Quick Start Programme is a time-limited program, and there has been too little progress in the development of a more permanent funding mechanism to replace it.

Organization of the Citizens' Report

This report describes the state of SAICM implementation around the world from the perspectives of public interest NGOs and CSOs. It documents progress, and points to directions where more work is needed. It also provides a sample of the work of some public interest NGOs and CSOs around the world to protect human health and the environment from hazardous chemicals. Since the over 700 participating organizations of IPEN are primarily self-organized by geography and language, the report presents information from the following regions: Anglophone Africa; Central and Eastern Europe (CEE); Eastern Europe, Caucasus, and Central Asia (EECCA); Francophone Africa; Latin America and the Caribbean; the Middle East; South Asia; and Southeast Asia. Finally, reports from Campaign members in the health and trade union sectors describe progress on SAICM implementation in those sectors.

The report describes the extent to which national plans have been created, multi-stakeholder mechanisms set up, the degree of public participation in planning and implementation, training programs carried out, educational materials developed and distributed, and many other activities. It also describes gaps in implementation that require further attention. For each region there is also a very brief sample listed by OPS objectives of the hundreds of public interest organization activities around the world that are implementing SAICM, with the relevant items of the Global Plan of Action noted for each. These tables are only a sample, and a more extensive list of over 300 activities can be found on the IPEN website.²¹

NGO Monitoring of SAICM Implementation in Eight Regions

Anglophone Africa²²

Generally the state of SAICM implementation in Anglophone African countries has been slow. A number of countries are lacking or have inadequate infrastructure for effective SAICM implementation, such as multi-stakeholder committees, chemical profiles, and adequate and enforceable policies and legislation. There is insufficient information to enable the public and end users of chemicals to take necessary measures towards sound chemicals management and reaching the SAICM 2020 goal.

Kenya and Tanzania have made important progress in examining the existing legislative framework and creating multi-stakeholder processes to implement SAICM. In Ethiopia, Mauritius, Mozambique, Nigeria, Uganda, and Zambia, progress has been slower, and public awareness of chemical safety issues is low. A number of SAICM Quick Start Programme Projects have been approved for the region and are being implemented. NGOs have been involved in some governmental SAICM processes, especially in Kenya and Tanzania, though in Mauritius and Zambia this involvement has been very limited. NGO capacity on chemical safety is low in some countries.

In Tanzania, NGOs are part of the National SAICM Secretariat and Steering Committee. They are also part of the technical committees under the Stockholm Convention National Implementation Plan, providing expertise on issues such as dioxins. In Kenya, NGOs have contributed to the discussions and decision on DDT reintroduction for malaria control and participated in a government organized forum on enhancing chemical information exchange in the country. The forum — Chemical Information Exchange Network — was organized jointly by the government of Kenya through the Ministry of Environment and Mineral Resources and the United Nations Environment Programme (UNEP). The forum involved webmaster training on the use of the UNEP Environmentally Sound Technology Information System (ESTIS) for data handling, database development and networking, and a multi-stakeholder workshop. In South Africa, NGOs are working with the government to create laws, regulations and policies to improve industry emissions.

Gaps

There are gaps in SAICM implementation, especially in terms of linking the current expansion of economic investments in Africa with related chemical pollution.

1. Lack of information about **industrial releases of chemical pollutants** (such as heavy metals and other industrial chemicals) and their associated environmental and health effects;
2. **Lack of regulations to control and monitor importation and disposal of e-waste** and near expiry electronic equipment;
3. **Limited involvement of the general public, industry, private sector, NGOs and public interest groups in the discussion and policy development processes**, contributing to poor understanding and enforcement of the relevant instruments, including chemical conventions and SAICM;
4. **Poor or nonexistent monitoring of production and economic activities** is the major gap when attempting to identify priorities with reference to specific locations or sectors in a country;

DDT Use in the Ethiopian Rift Valley

The Institute for Sustainable Development and the Ethiopian NGO Africa Stockpiles Network organized a one day workshop in February 2009 for 41 people from government, NGOs, UN agencies, universities and the private sector to examine how DDT is being used for malaria control in the Rift Valley. During the workshop, participants developed a common understanding of the situation in which sprayers are contracted to spray the chemical on the inside walls of houses once or twice a year. They also agreed to strengthen their technical cooperation in order to tackle the risks of DDT for public health, the environment, and the export market for crops.

The workshop discussed the benefits and risks of controlled use of DDT by the Ministry of Health in reducing malaria rates. Participants also discussed a study published in 2008 by the Institute for Sustainable Development (ISD) and the Pesticide Action Network (PAN-UK) with financial support from the European Union. The study surveyed 422 farmers, and confirmed earlier reports that nearly 30% of farmers use DDT on their crops, despite the fact that it is banned for agricultural use and not available for purchase by the general public. Participants identified the sources of possible DDT “leakage” into the open market as the plant where it is produced, and the contracted house sprayers.

5. **Inadequate financial resources;**
6. **Insufficient human capacity** for implementation and monitoring in both government and public interest organizations;
7. **Insufficient and unavailable information** on chemical safety issues.

SAICM Implementation by NGOs in Anglophone Africa

NGOs in Anglophone Africa have actively engaged in implementing each of the major SAICM objectives

outlined in the OPS and have covered a variety of items from the GPA. Table 1 illustrates a small number of examples of NGO activities from a much larger list of 43 activities in nine countries.²³ Table 1 shows that NGO activities have included addressing medical waste and DDT alternatives as well as public awareness-raising and capacity building on pesticides. Anglophone African NGOs are also providing policy recommendations on chemical regulatory frameworks and assessing illegal traffic of pesticides. These activities address GPA items 23, 27, 29, 54, 56, 70, 84, 89, 102, 119, 162, 174, 187, 188, 194, 197, 227, 256, 258, and 265.

Table 1. Examples of SAICM Implementation by NGOs in Anglophone Africa

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Researched and promoted alternatives to medical waste treatment GPA Items: 54, 56, 70, 84, 119, 162, 258	Agenda for Environment and Responsible Development, groundWork	South Africa, Tanzania
	Studied/ Promoted alternatives to DDT and other toxic chemicals GPA Items 27, 29, 54, 89	African Stockpiles Program Network, Agenda for Environment and Responsible Development, Environment, Human Rights Care and Gender Organization, Institute for Sustainable Development, National Association of Professional Environmentalists, Physicians for Social Responsibility Kenya, Pro-biodiversity Conservationists in Uganda, Uganda Network on Toxic- Free Malaria Control	Ethiopia, Kenya, Tanzania, Uganda
Knowledge and Information	Developed of a Consolidated Guide to the Chemical Codes and Conventions as an International Tool for Preventing Local Pesticide Problems in English, French and Kiswahili GPA Items: 23, 102, 109, 188	Agenda for Environment and Responsible Development, Pesticide Action Network Africa, Pesticide Action Network United Kingdom	Africa wide
Governance	Reviewed and improved the legal and institutional framework on chemicals management GPA Items: 174, 187, 194, 197	Agenda for Environment and Responsible Development, groundWork, iLima, National Association of Professional Environmentalists, Nigeria Africa Stockpiles Program Implementation NGO Network, Third World Investment Gateway	Kenya, Nigeria, South Africa, Tanzania, Uganda
Capacity Building	Provided training on environmental monitoring of pesticides GPA Items: 227, 256	Africa Stockpiles Network South Africa, Agenda for Environment and Responsible Development, groundWork, Institute for Sustainable Development, Nigeria Africa Stockpiles Program Implementation NGO Network	Ethiopia, Nigeria, South Africa, Tanzania
Illegal Traffic	Prepared case study on the strategic assessment of illegal pesticides trading GPA Items: 265	Agenda for Environment and Responsible Development, Nigeria Africa Stockpiles Program Implementation NGO Network	Nigeria, Tanzania

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Central and Eastern Europe (CEE)²⁴

This region includes both European Union (EU) Member States and non-EU countries. While implementation of chemical safety legislation and its enforcement is governed by EU rules in the northwestern and central part of the region, the situation is different in the eastern and southeastern part of the region. EU countries have to meet certain EU obligations regarding chemical safety. There are specific EU directives that need to be introduced into the national legislation by national laws, and there are also regulations that apply to national legislation. One notable recent regulation is Registration, Evaluation and Authorization of Chemicals, known under its abbreviation as REACH. REACH requires that chemical manufacturers submit health and environmental data on a schedule linked to production hazards and production volume (“registration”). Regulators then evaluate the information (“evaluation”). Chemicals of very high concern may be prohibited or require governmental approval for particular uses (“authorization”). All EU countries are governed by REACH, and EU accession countries (Croatia, Macedonia, and Turkey) are obliged to implement it by the date of their full entry into the EU. Outside the EU, there are examples of countries that have not adopted REACH or any similar regulatory system. Most governments in the CEE region have signed the major international conventions on chemical safety, including the Stockholm Convention. NGOs have participated in the preparation of some national SAICM Implementation Plans in the region, though there has been wide variation in the level of that participation from country to country and through the planning process. Progress in the non-EU countries in the region has been slowed by a lack of financial and technical resources.

Gaps

A number of significant gaps remain to be addressed.

- 1. Low level of public awareness activities on chemical safety issues;**
- 2. Public access to information about:**
 - a) releases of chemicals from specific industrial sources** — Full Pollutant Release and Transfer Registers accessible to the public are needed in more countries;
 - b) chemicals in products** — This problem is especially serious in non-EU member states, but for many products it applies to EU countries as well;
- 3. Illegal traffic of both hazardous and mixed municipal waste from the western part of the region to the eastern part** — From EU member states to non-EU states and/or from the older 15 EU members to the

newer 12 members and countries outside the EU. There have been several incidents of illegal waste traffic in the last few years to Ukraine, Belarus, Czech Republic, Poland, Slovakia, and Hungary. Additionally, there was a scandal with the export of hazardous waste from Netherlands to Côte d’Ivoire, which also illustrates the loopholes in waste management control in the western part of Europe;

- 4. Inadequate waste management and weaknesses of new waste legislation regarding chemical safety** — The new waste framework directive and Persistent Organic Pollutants (POPs) regulations allow the release of high volumes of POPs through the waste flow, promotion of technologies producing new POPs such as incineration of wastes, and more open borders to waste movement;
- 5. Double standards in chemical policy** — Different legislative and other measures to control chemicals in EU and non-EU parts of the region;
- 6. Weak and unbalanced engagement of stakeholders in the development of strategies at the national level** — Lack of tools such as public consultations or active invitations to NGOs to participate;
- 7. Slow and non-transparent clean up of contaminated sites** — Lack of financial resources, weak enforcement and, quite often, risk assessment studies are not publicly available;
- 8. Lack of an official definition or the meaning of Integrated Pest Management (IPM)** — Lack of clarity here means that hazardous pesticides like endosulfan are included.

SAICM Implementation by NGOs in CEE

NGOs in the CEE region have actively engaged in implementing each of the major SAICM objectives outlined in the OPS and have covered a variety of items from the GPA. Table 2 illustrates a small number of examples of NGO activities from a much larger list of 30 activities in nine countries.²⁵ Table 2 shows that NGO activities have included addressing risk reduction activities on chemicals in products and informational activities on waste systems and more broadly on chemicals. REACH has been a major SAICM governance issue for NGOs in the region. CEE NGOs are also providing capacity building on chemicals and wastes and conducting analytical sampling studies at waste dump sites. These activities address GPA items 70, 89, 108, 112, 121, 134, 146, 161, 162, 174, 187, 258, 259, and 273.

Table 2. Examples of SAICM Implementation by NGOs in CEE region

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	“Municipal waste in Mazow – improving performance” GPA Items: 70, 161, 162, 187, 258	Krajowy Ruch Ekologiczno-Spoeczny	Poland
	“Do not play with PVC/PVC Free Healthcare” (chemical safety of toys, medical devices and food packaging) GPA items: 89, 108, 112	Arnika – Toxics and Waste Programme, Friends of the Earth Slovakia	Czech Republic, Slovakia
Knowledge and Information	Conducted waste separation systems comparison surveys GPA Items: 121, 134, 162	Center for Sustainable Alternatives Support	Slovakia
	Produced Hungarian Monthly Chemicals Newsletter GPA Items: 89, 112, 146	Clean Air Action Group	Hungary
Governance	Conducted REACH campaign (Chemical Reaction)/REACH promotion GPA Items: 112, 187	Arnika – Toxics and Waste Programme, Baltic Environmental Forum, Center of Environmental Solutions, Clean Air Action Group, Friends of the Earth- Latvia, Friends of the Earth – Slovakia, Greenpeace, Society for Sustainable Living, Umanoterra	Belarus, Czech Republic, Estonia, Hungary, Latvia, Slovakia, Slovenia, Poland
Capacity Building	Conducted regional workshops on waste and chemicals GPA Items: 70, 161, 258, 259	Arnika – Toxics and Waste Programme	CEE Region
Illegal Traffic	Conducted sampling and analysis of wastes imported illegally to the village of Belaruchi GPA Items: 174, 273	Center of Environmental Solutions	Belarus

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Rubik, Albania case study – Raising Awareness about chemicals from abandoned industrial facilities in the CEE Region by the EDEN Center and Arnika - Toxics and Waste Programme

In the late 1930s a copper smelting plant was built in Rubik, Albania. After more than 60 years of production the factory was closed in 1998. During its more productive years, it generated 30,000 tonnes of mineral residues annually which were deposited in the surrounding area. While the plant has fallen silent, it continues to pollute a decade later.

United Nations Environment Programme sampling of the soil and water in 2000 found significant amounts of copper, chromium, lead and cadmium. Although testing is still underway, given the fact that copper ore smelting is considered to be a significant source of dioxin pollution, the area surrounding the factory may also be contaminated by dioxins.

Albanian NGOs proposed four steps that need to be taken with high priority in order to prevent the environment and health of the people of Rubik from being endangered by

hazardous waste disposed in the area of the former copper plant:

- As a short-term means of preventing groundwater contamination, the residue has to be covered with lime or limestone;
- Potential risks to human health in the area have to be clarified. Private well water quality downstream of the factory has to be investigated;
- Monitoring wells between the factory and the river have to be established. River waters and private well water have to be monitored;
- The contamination potential has to be eliminated altogether. The residue has to be moved back into the mine.

After ten years, NGOs are emphasizing the need to take action.

Eastern Europe, Caucasus, and Central Asia (EECCA)²⁶

Having signed the SAICM High Level Declaration in February 2006, EECCA governments declared their clear commitment to SAICM. In many countries SAICM implementation projects were launched. National focal points are being established to facilitate implementation of the SAICM Global Plan of Action. In addition to government focal points, some EECCA countries have also established NGO-based focal points.

EECCA countries actively participate in regional SAICM events. At a Central and Eastern European regional meeting of stakeholders (which included EECCA countries) held in Bucharest in September 2008, participants developed a list of priority regional directions. The list will be used *inter alia* for potential submission of a joint regional application to the SAICM Quick Start Programme. The list incorporates such issues as chemical safety legislation and rehabilitation of contaminated sites, including obsolete pesticides. In addition, the meeting participants decided to establish a coordination group of governments, industry, public interest NGOs, and international organizations to facilitate improvement of information exchange on chemical safety matters in the region, and develop common regional chemical safety positions on different SAICM-related issues. NGOs have also been quite active in contributing to Stockholm Convention National Implementation Plans, identification of stockpiles of obsolete pesticides and PCBs that were missing from national inventories, estimates of contamination of food by POPs pesticides, development of a Pollutant Release and Transfer Register, and biomonitoring to assess body burdens of toxic chemicals.

Many EECCA countries have ratified international chemical conventions and treaties, including the Stockholm Convention on POPs, Basel and Rotterdam Conventions. Most countries have developed National Implementation Plans for the Stockholm Convention on POPs, and country profiles for assessment of national POPs management infrastructure. Countries of the region have begun to revise national legislation for purposes of long-term strategic planning. Nonetheless, due in part to limited financial and technical resources, SAICM implementation has been slow.

Gaps

1. **Aging chemical facilities** operating long past their expected life;
2. **Weak control over separate stages of chemical production**, whereby common chemicals are imported and used by small production facilities to produce hazardous unregulated chemicals;

3. **Poorly regulated air emissions** of toxic chemicals;
4. **Accumulation of toxic waste** – For example, one country in the region has accumulated more than 25 billion tonnes of waste, covering more than 160,000 hectares;
5. **Incineration of municipal, industrial, and medical waste**, and uncontrolled open burning of waste – these generate dioxins and furans, and one large city alone has plans to build six more incinerators and to use the ash for road construction;
6. **Stockpiles of obsolete pesticides** – These exist throughout the region. For example, one country has 40,000 tonnes, and another over 20,000 tonnes. Most are poorly stored in damaged facilities and without packaging, under the open air;
7. **Production and use of asbestos-cement products** – The region leads the world in production and application of this deadly material. In one country, one plant alone releases 6.5 tonnes per year of asbestos-containing dust into the air. The problems of utilization of asbestos-containing construction waste are equally serious. Asbestos waste can be seen in the streets, along the roads, and in backyards;
8. **No information on potentially hazardous chemicals in products**, and low public awareness of the risks;
9. **Lack of properly equipped analytical laboratories**;
10. **Lack of sufficient legislation** to require producers and importers to improve the safety of their products, and **insufficient political will or public demand** to tighten control;
11. **Lack of access to information** on toxic chemicals and insufficient involvement of the public in important decisions;
12. **Inadequate financial resources.**

SAICM Implementation by NGOs in EECCA

NGOs in the EECCA region have actively worked towards achieving all the SAICM OPS objectives and have covered a variety of GPA activities. Table 3 illustrates a small number of examples of NGO activities from a much larger list of 36 activities in 8 countries.²⁷ Table 3 shows that NGO activities have included risk reduction activities on consumer products; links between chemical exposures and public health; the problems of toxic metals; capacity building on ecological agriculture; capacity building on asbestos; and a case study involving illegal traffic of pesticides. These activities address GPA items 7, 20, 36, 54, 56, 57, 89, 112, 150, 159, 163, 165, 174, 187, 211, 215, 216, 255, 265, and 273.

Table 3. Examples of SAICM Implementation by NGOs in EECCA

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	“Toxic Free Baby Products”: Advocacy Campaign in Belarus, Russia and Ukraine GPA Items: 7, 54, 150, 163	Center of Environmental Solutions, Eco-Accord, MAMA-86-Kharkiv	Belarus, Russia, Ukraine
Knowledge and Information	“Impact of Toxic Chemicals on the Environment and Public Health in Central Asia: Ways to Address Problems” GPA Items: 54, 56, 89, 112, 163	Eco-Accord, Greenwomen	Kazakhstan
	“Protecting the right of people for a toxic free future” GPA Items: 54, 56, 89, 112, 163	ARMON Women’s Environmental Centre	Uzbekistan
Governance	“The Problem of Environmental Contamination by Cadmium, Lead and Mercury in Russia and Ukraine” GPA Items: 54, 57	Eco-Accord, MAMA-86-Kharkiv	Russia, Ukraine
	“Policy and legislation on chemicals management in Russia and Ukraine: research and recommendations” GPA Items: 165, 174, 187	Eco-Accord, MAMA-86	Russia, Ukraine
Capacity Building	“Asbestos: Raising Awareness in Eastern Europe to Strengthen the Rotterdam Convention” GPA Items: 20, 211, 215, 216	Greenwomen, Eco-Accord, MAMA-86-Kharkiv	Kazakhstan, Russia, Ukraine
	“Sustainable pesticide management and pesticide free agriculture in Armenia” GPA Items: 36, 159, 255	Armenian Women for Health and Healthy Environment	Armenia
Illegal Traffic	Conducted case study on the strategic assessment of illegal pesticide trading GPA Items: 265, 273	Foundation in Support of Civil Initiatives	Tajikistan

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Pesticides in Tajikistan

In 2008 the Fund for Support of Citizens’ Initiatives (FSCI) in Tajikistan analyzed the situation of DDT importation and use in the country. The group found DDT readily available in shops and marketplaces as part of pesticides sold as “dust” by women and children in marketplaces and by men in storage facilities. With the assistance of the Moscow-based Eco-Accord Program on Chemical Safety, the group collected data, compiled and analyzed available information on import, storage and application of DDT, analyzed applicable legislation, and analyzed research data on the health impacts of DDT and DDT levels in food products.

FSCI released a report on these issues, and convened a workshop to publicize it. Participants at the workshop visited a burial site for pesticides (including DDT), and found that it had been looted, and the toxic chemicals were easily accessible. The burial site was not guarded, and not even fenced in. FSCI later organized a round table discussion on Tajik national TV Channel One highlighting different approaches to pesticide application and management in Tajikistan, pesticide impacts on human health, and the illegal trade of DDT in the country. The round table drew together people from government, business, NGOs, the scientific community, and the general public.

Francophone Africa²⁸

The majority of countries in the region have signed the major multilateral environmental agreements – the Stockholm Convention, the Rotterdam Convention, and SAICM. In some countries, especially Benin, Mali, and Senegal, NGOs are full partners in government commissions dealing with chemicals. Most have institutions dedicated to chemical safety, but they are handicapped by a lack of information about chemicals in use and the details of international conventions, hampered by poorly equipped analytical laboratories, and limited by financial resources. Legislation governing chemicals mostly dates from the 1970s and 1980s, before the Rotterdam and Stockholm Conventions and SAICM, and has not kept pace with developments in industry and international law. Some regulations have been updated, such as Senegal's regulation forbidding the importation, production and use of POPs chemicals listed in the Stockholm Convention, though regulations do not have the same weight as legislative changes.

The nine states of the Permanent Interstate Committee against Drought in the Sahel (CILSS) have all agreed to common regulations on pesticides, which is a major step forward in harmonizing regulatory systems in West Africa. To make the system effective will require greater appropriation of funds from government budgets and donor partners. The Economic Community of West African States (ECOWAS) has established a similar convention. Both conventions recommend that states create National Commissions for Chemical Management.

A large issue in the region is the problem of illegal trade in chemicals. This situation is due in part to the permeability of borders, but also to the lack of information for Customs officers about which chemicals are banned or controlled. Weekly markets of traders from many countries exist across the region, and many chemical products are sold in them with little control.

Lack of finance to support chemical safety measures is the biggest issue for the region. For example, none of the National Commissions for Chemical Management has a budget, which makes it impossible to improve chemical safety. Fourteen countries in the region have received funding from the SAICM Quick Start Programme, though average grants are only around US\$120,000. The Global Environment Facility has provided funds to 18 countries in the region with grants averaging US\$300,000-\$500,000 for Stockholm Convention implementation activities.

Gaps

The following are the most important issues to be addressed.

1. **Information** for the public and policy-makers on chemical issues;
2. **Implementation of regulations and laws** on chemical issues;
3. **Lack of finance** to implement chemical safety measures;
4. **Capacity building** of NGOs, civil society, communities and national NGO networks and working groups around chemical management and monitoring of the impacts on health and the environment;
5. **Research and promotion of alternatives to chemical pesticides** in agriculture and health, such as alternatives to the use of DDT for malaria control;
6. **Strengthening of NGO participation** in national and international policies on chemical management.

SAICM Implementation by NGOs in Francophone Africa:

NGOs in Francophone Africa have actively worked towards achieving all SAICM OPS objectives, and have covered a variety of GPA activities. Table 4 illustrates a small number of examples of NGO activities from a much larger list of 19 activities in eight countries.²⁹ Table 4 shows that NGO activities have included risk reduction activities on contaminated sites; links between pesticides and poverty; and capacity building on ecological agriculture and water pollution. These activities address GPA items 23, 24, 25, 27, 33, 36, 47, 68, 112, 114, 144, 147, 155, 159, 165, 187, 195, 206, 215, 255, 258 and 265.

Table 4. Examples of SAICM Implementation by NGOs in Francophone Africa

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Conducted study on polluted park of Konkouati by dioxins, PCBs and hexachlorobenzene GPA Items: 47, 68	Association for the Protection of the Environment and Promotion of Organic Agriculture	Congo
	Conducted study on impacts of pesticides used on locust control at Bouafa-Figuig & Tan Tan (Morocco) GPA Items: 23, 25, 159	Association for Environmental Education and Protection of Birds of Morocco	Morocco
Knowledge and Information	“Pesticide and Poverty Project: implementation of international conventions on pesticides for sustainable development” GPA Items: 24, 114, 215	Pesticide Action Network Africa	Africa wide
	Worked to sensitize farmers and farm workers on the unwanted effects of pesticides in the irrigated area of Djiritawa GPA Items: 112, 144, 147, 155	Life and Development Association Kowa Muna	Niger
Governance	Participated with the National Commission for Management of Pesticides in national chemical policy GPA Items: 23, 27, 165, 187, 195, 206	Pesticide Action Network Africa	Senegal
Capacity Building	Promoted techniques for organic production in the Prefecture Tchamba GPA Items: 27, 159, 255	The National Consumers and Environmental Alliance	Togo
	Held regional workshop on water and water pollution by pesticides in Africa GPA Items: 36, 258	Pesticide Action Network Africa	West Africa
Illegal Traffic	Conducted project to protect Guiers Lake against pesticide pollution: Research and Awareness creation on the dangers of illegal trade in pesticides GPA Items : 33, 159, 255, 265	Northern Network for the Protection of the World Environment	Senegal

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Handling chemicals in the Mattress Industry in Benin and Togo

Mattress makers in Benin and Togo are exposed to a variety of volatile and toxic chemicals in their daily work. **The Action Group for the Promotion of Flora and Fauna (GAPROFFA)** surveyed informal craftsmen, manufacturers of locally produced foam, and industrial manufacturers of foam to determine levels of awareness of this issue and best practices for protecting human health and the environment.

The results show that almost all craftsmen every day handle foam, glue, and packing materials. The majority of mattress

makers and craftsmen are somewhat aware of the toxicity of chemicals used in foam and glue. More than half of the respondents reported that illnesses can be easily caused by a constant use of glue, mainly through inhalation. Common symptoms are nausea, cold, cough, stomach aches, dizziness, skin and face rashes and irritation. Craftsmen reported spending 10% of their revenue on health care costs. The study will continue in order to develop alternatives for lower toxicity and reduced health and environment hazards linked to foam and glue use in mattress making.

Latin America and the Caribbean³⁰

Many countries in the region have made progress in SAICM implementation, either by prioritizing the development of national chemicals inventories or updating pre-existing ones. However, many have had difficulties in getting information from industry and access to adequate financial resources.

In general, governments have not yet established national strategies to communicate what SAICM is beyond the environmental community, so the public does not know about it, nor do local government authorities. NGOs are part of the government implementation committee or consultation processes in a few countries, but in general, this consultation is still weak. Most have not established permanent regular structures to incorporate civil society participation in other areas of SAICM, even in countries with a large established chemical industry.

On pesticides, the implementation of the Food and Agriculture Organization (FAO) Code of Conduct and the phase-out of Highly Hazardous Pesticides represent important activities to ensure countries will meet the SAICM 2020 goal. FAO has expressed interest in developing pilot projects with this approach in Bolivia and Nicaragua.

NGOs have been active participants in SAICM implementation. Most notable has been the progress on lindane. The **Pesticide Action Network in Mexico (RAPAM)** got wide support from environmental, academic, and peasant organizations to urge the government to nominate lindane and its isomers for listing under the Stockholm Convention, which would eliminate production, use, import, and export. In Chile, the **Alliance for the Quality of Life** led a coalition with the **National Association of Rural and Indigenous Women (ANAMURI)** in a successful campaign to end all uses of lindane at the end of 2007. Regarding endosulfan, several countries are restricting uses or reassessing authorized use, supported by reports and campaigns by the **Pesticide Action Network in Latin America (RAPAL)**.

Public Information on Incineration in Argentina

In Argentina, the **Citizen's Anti-Incinerator Coalition** produced twelve radio spots and uploaded them for free download on the internet, produced a guide outlining the issues associated with incineration, and compiled a document titled: "Incinerator Ash: Answers to Frequently Asked Questions."

These materials are available for free, and are useful for people from all Spanish-speaking countries in Latin American and the Caribbean. They provide information on the toxic chemicals released by incinerators, and the issues involved in managing their toxic outputs. The materials are easy to understand and cover a wide range of issues, including the existence of safer alternatives.

Gaps

The major gap in SAICM is that governments in Latin America and the Caribbean have not placed a high political priority on chemical safety and SAICM. Most attention has gone to climate change and other environmental issues like biodiversity. Most countries do not have a clear policy established on chemical safety and its importance for sustainable development and the Millennium Development Goals. The most important issues that need to be addressed are:

1. **Pesticides** — The development of policies and programs to support sound agricultural practices, especially in the context of the FAO discussion of the phase out of Highly Hazardous Pesticides;
2. **Persistent, Bioaccumulative and Toxic substances (PBT) and Cleaner Production** — Clear policies and programs to promote the use of safe and effective alternatives and substitutes as called for in the SAICM Global Plan of Action;
3. **Zero Waste** — Capacity building programs on waste minimization, clean recycling and alternative treatment methods instead of incineration or other thermal-related technologies;
4. **Governance** — Effective national multiple stakeholder coordination bodies and mechanisms to reinforce civil society participation in the SAICM National Implementation Plan, including not just environmental but labor groups, women's and children advocacy groups and grassroots social organizations;
5. **Inadequate financial resources;**

continued on page 23

Chemical Problems, Citizens Taking Action

Images From Around the World



1. A Tanzanian farmer explains her Integrated Pest Management techniques. (Credit: AGENDA, Tanzania)

2. Environmental monitoring by NGOs is important in protecting human health and the environment. (Credit: EDEN, Albania)

3. Open burning of waste persists in Karasin, Thailand, releasing dioxin into the air and leaving toxic ash. (Credit: CAIN, Thailand)



4. Campaigning for the consumers' right to ask and right to know. (Credit: Gigie Cruz, GAIA, Philippines)

5. The remains of the Rubik copper smelting plant in Albania, which has not been cleaned up ten years after its closure. (Credit: Albana Bregaj)

6. ARNIKA from the Czech Republic illustrates for decision-makers a long list of public support for chemical safety. (Credit: ARNIKA)





7. In rural areas, the relationship between the farm land and community is very close, thus exposure of hazardous pesticides also threatens families living on the land and in the agricultural environment.

(Credit: © 2004 EC-R. Canessa)

8. A bin of used syringes and other healthcare waste from a Thai hospital (Credit: CAIN)



9. Women in India recycling electronic waste. (Credit: Toxics Link, India)

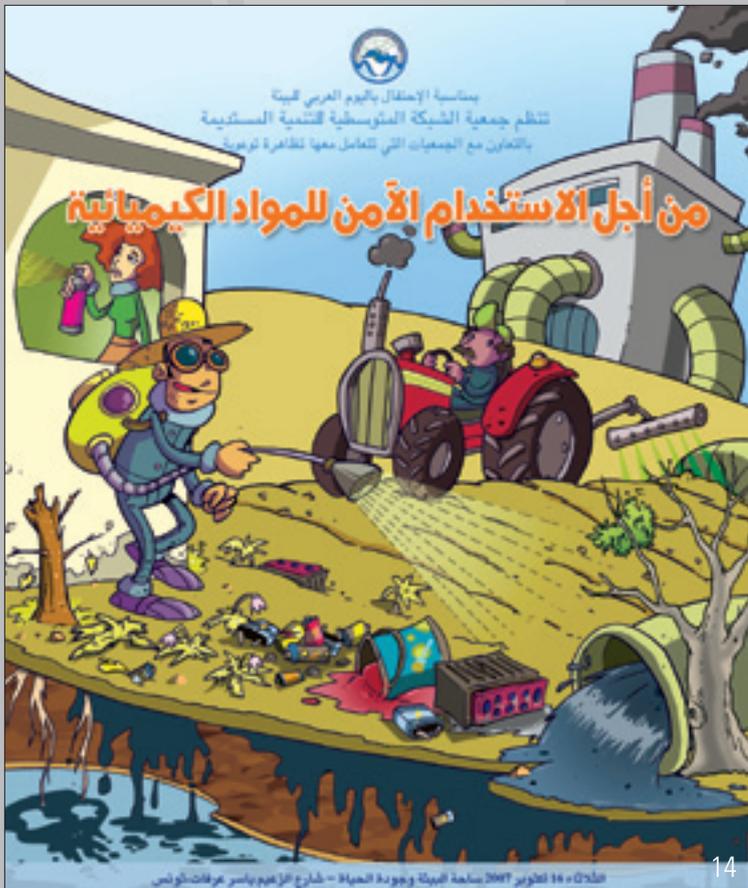
10. Obsolete pesticide storage in Ukraine (Credit: Mama 86)

11. Students in Sri Lanka learn about chemical safety. (Credit: Balangoda Environmental Forum)





12



14



13

12. Heng Yen Kora of the Community Sanitation and Recycling Organization in Cambodia speaks to the media about the Zero Waste approach to safely managing waste. (Credit: Anne Larracas, GAIA)

13. EcoWaste Coalition members warn against dumping of recalled toxic toys in Philippines. (Credit: Manny Calanzo, GAIA)

14. This poster celebrated the Arab Day of the Environment. (Credit: AREMEDD, Tunisia)

- 6. Access to government information and environmental justice** – This is a problem in many countries, and has become a human rights issue in communities affected by contaminated areas.
- 7. Mining projects** – This is an area of growing concern among communities and grassroots organizations in many countries in the region because of social conflicts and other impacts created by the release of toxic substances.

objectives and have engaged in a variety of GPA activities. Table 5 illustrates a small number of examples of NGO activities from a much larger list of 33 activities in 14 countries.³¹ Table 5 shows that NGO activities have included risk reduction activities on mercury; information on alternatives to endosulfan; policy proposals for phase-out of POPs; and training in occupational health for women. These activities address GPA items 9, 20, 44, 45, 51, 54, 57, 70, 85, 114, 150, 161, 164, 165, 175, 218, 245, 255, 258, and 262.

SAICM Implementation by NGOs in Latin American and the Caribbean

NGOs in Latin America and the Caribbean have actively worked towards achieving the major SAICM OPS

Table 5. Examples of SAICM Implementation by NGOs in Latin America and the Caribbean

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Promoted mercury substitution in the health sector and alternatives to medical waste incineration through pilot projects and courses by internet GPA Items: 44, 45, 54, 57, 258, 262	Health Care Without Harm and NGO members in Latin America	Argentina, Brazil, Chile, Costa Rica, Honduras, Mexico
Knowledge and Information	“Endosulfan and Its Alternatives in Latin America” (Report I and II) GPA Items: 51, 85, 89, 114	Action Network on Pesticides and Alternatives in Mexico and Latin America	Argentina, Brazil, Bolivia, Chile, Costa Rica, Cuba, Mexico, Paraguay
	Conducted public awareness campaigns on the health and environmental risks of incineration and other thermal technologies for waste treatment, and on the zero waste approach GPA Items: 70, 161, 258, 262	Members of the Global Alliance for Incinerator Alternatives in Latin America	Argentina and several other Latin American countries
Governance	Promoted public awareness and policy change proposals for the phase-out of POPs, mercury and asbestos GPA Items: 20, 57, 165, 175	Association Against POPs	Brazil
Capacity Building	Conducted trainings in women’s labor rights in occupational health and safety GPA Items: 164, 255	Network of Union Women	Mexico
	Worked to build children’s environmental health capacity among health care professionals GPA Items: 9, 150, 218, 245	Argentinian Association for Doctors for the Environment	Argentina, Chile, Uruguay and Paraguay

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Middle East³²

One of the main outputs of SAICM implementation in the Arab region has been the identification of capacity needs for sound chemicals management. Additionally, recognition that national priority-setting, awareness-raising, and strengthening of laws are important components of the SAICM Global Plan of Action has been an important result. These objectives were adopted by all Arab governments through the Arab Ministers of Environment at the Arab League meetings of November 2006 and December 2007. The implementation was left to each country's priorities and capacities. Due in part to limited financial and technical resources, SAICM implementation has been slow.

As part of that process, a study was prepared and adopted in December 2007 on the adequacy of existing laws in Arab countries to fulfill their commitment to the international environmental conventions. In addition, a guideline for Arab countries to improve and update their laws was released in December 2007. Most of the Arab countries have ratified the Basel, Stockholm, and Rotterdam Conventions, and are signatories to SAICM.

The Arab governments and NGOs have played an important role in preparing to adopt and implement SAICM by establishing an Arab Coordination Unit. In most of the region there is national cooperation between governments and NGOs on chemical safety issues. NGOs, along with Ministries and other authorities, contribute to the national committees and attend the meetings of the Arab team for chemical substances and hazardous wastes in the League of Arab States.

Regarding the issue of illegal trade, the Arab Committee on International Conventions on Hazardous Substances and Wastes of the Arab League is preparing a study to reduce illegal trade in chemical substances and hazardous wastes. In addition, there is a project to reduce illegal trade in hazardous wastes under supervision of the Regional Center for the Basel Convention for Arab countries.

Gaps

There are some problems that the SAICM implementation process has faced:

1. **Lack of a permanent and sustainable financial mechanism** – A limited number of countries have obtained support from the SAICM Quick Start Programme, and none from the Global Environment Facility (except for one regional project on DDT);
2. **Variations in the implementation of international conventions** on the national level;
3. **Difficulties in coordination** among related authorities on the national level;
4. **Lack of capacity and capacity-building** on the national level for some SAICM work areas;
5. **Lack of financial and technical assistance**;
6. **Difficulty in prioritizing issues to concentrate on specific work areas**;
7. There is often **limited or no information** on many chemicals currently in use and often **limited or no access to information** that already exists;
8. **Insufficient access to affordable, safer technologies and alternatives**, which will also assist in reducing illegal traffic in hazardous chemicals;
9. **Lack of clear, accessible, timely and appropriate information** on chemicals for ready use by local populations;
10. **Illegal international traffic** in hazardous substances and dangerous products is a pressing problem for many countries.

SAICM Implementation by NGOs in the Middle East

NGOs in the Middle East have actively worked towards achieving all the SAICM OPS objectives, engaging in a variety of GPA activities. Table 6 illustrates a small number of examples of NGO activities from a much larger list of 96 activities in nine countries.³³ Table 6 shows that NGO activities have included awareness-raising workshops on wastes and pesticides; participation in the development of national chemical profiles; and preparation of a study to investigate illegal traffic. These activities address GPA items 1, 70, 114, 116, 161, 165, 166, 174, 187, 195, 204, 211, 258, and 266.

Table 6. Examples of SAICM Implementation by NGOs in the Middle East

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Carried out workshops to raise awareness on minimizing hazardous waste generation GPA Items: 70, 161, 187, 258	Badia Revival and Environmental Protection Society, Day Hospital Institute for Development and Rehabilitation, Environmental Protection and Sustainable Development Society, Mediterranean Network for Sustainable Development, Moroccan Society of Clinical Toxicology and Analysis, Palestinian Environmental Friends, Sudanese Environment Conservation, Yemeni Society for Environment and Sustainable Development	Egypt, Jordan, Morocco, Palestine, Sudan, Syria, Tunisia, Yemen
Knowledge and Information	Carried out 200 awareness-raising events on the use and management of pesticides GPA Items: 114, 116	Day Hospital Institute for Development and Rehabilitation	Egypt
Governance	Participated in the development of National Chemical Profiles with the Ministry of Environmental Affairs Agency and all stakeholders GPA Items: 1, 165	Badia Revival and Environmental Protection Society, Day Hospital Institute for Development and Rehabilitation, Environmental Protection and Sustainable Development Society, Lebanese Environment Forum, Mediterranean Network for Sustainable Development, Moroccan Society of Clinical Toxicology and Analysis, Palestinian Environmental Friends, Sudanese Environment Conservation, Yemeni Society for Environment and Sustainable Development	Egypt, Jordan, Lebanon, Morocco, Palestine, Sudan, Syria, Tunisia, Yemen
Capacity Building	Conducted programs to develop chemicals management instruments including national profiles, national implementation plans, and national emergency preparedness & response plans GPA Items: 166, 174, 195 211	Day Hospital Institute for Development and Rehabilitation, Mediterranean Network for Sustainable Development, Moroccan Society of Clinical Toxicology and Analysis	Egypt, Morocco, Tunisia
Illegal Traffic	Worked to expand the level of coordination and cooperation among stakeholders by preparing a study to prevent illegal traffic GPA Items: 204, 266	Day Hospital Institute for Development and Rehabilitation in cooperation with the League of Arab States	Egypt

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

SAICM Awareness-raising in the Arab and Mediterranean Region

The **Mediterranean Network for Sustainable Development (AREMEDD)** organized three important meetings to raise awareness about the SAICM process and issues. The first was a meeting of Tunisian NGOs on SAICM to help participants learn about its objectives, contents and mechanisms, stressing the importance of this approach for human health and the safety of the environment. Participants affirmed their commitment to take part in this strategy along with the institutions of Tunisian state, private sector and civil society.

AREMEDD also organized a regional conference for the Arab and Mediterranean region in November 2007 on chemicals management. Participants ended the meeting with the adoption of the “Call of Tunis” on the use of chemicals in the region. AREMEDD organized a second regional conference on chemical safety in the region where the emphasis was on the importance of science and technology in the sound management of chemicals. Both of these conferences received wide coverage by the TV and newspapers.

South Asia³⁴

The countries of the South Asian region have predominantly been agro-based economies and have consistently pushed for higher agricultural growth through the use of chemical fertilizers and pesticides. The rapid growth in industrialization and consumption patterns, using some of the most hazardous chemicals without adequate safeguards, has resulted in widespread contamination of air, soil and water.

Many countries in the region have signed the SAICM High Level Declaration and committed themselves to achieve the 2020 goal. However, in countries with rapidly growing economies, the production and consumption of highly toxic, bio-accumulative and persistent chemicals has increased. The chemicals management regime in many countries is seriously handicapped for want of data and information on most chemicals and their impacts. All governments in the region have initiated various processes for developing national chemical policies and for strengthening institutions to manage them properly. However, few

concrete plans or actions have yet been completed. Some countries have not made any separate financial allocation for SAICM implementation, and few have accessed the limited funds in the SAICM Quick Start Programme Trust Fund. The slow start to SAICM implementation in the region suggests that for governments, chemical issues are a low priority on the environment agenda. In addition, the chemical safety and development agendas have not been linked in the region as spelled out in the High Level Declaration.

NGOs in the region have been active and are engaged on cross-cutting issues of chemicals management including: chemical pesticides and fertilizers; heavy metals; municipal and biomedical waste; occupational safety; alternatives to mercury in health care; and Persistent Organic Pollutants. Restricted public participation in all conversations of SAICM implementation has slowed the ability of citizens to contribute. In many countries the process of stakeholder consultations needs strengthening because little information is being made available.

25 Years after Bhopal

As stakeholders come together to evaluate the state of SAICM implementation, the Bhopal Chemical Disaster provides a powerful baseline marker of the past and of how far we have to go to reach the 2020 goal. The 23,000 deaths and ongoing poisoning of Bhopal, twenty-five years after the disaster, should inspire a greater commitment to achieving the 2020 goal by building a precautionary, sustainable and toxic-free future. The disaster also reminds us of the importance of corporate responsibility, liability, and compensation.

The Ongoing Disaster

The third day of December 2009 marks the 25th Anniversary of one of the world's worst chemical disasters. Just after midnight, a Union Carbide pesticide factory in Bhopal, India exploded, sending a cloud of poisonous gas over a sleeping city, killing thousands and permanently injuring more than 100,000 people. Twenty-five years later, the company has still not cleaned up the factory, which continues to leak toxic chemicals into neighborhood wells. Twenty-five years later, a new generation is being born in Bhopal with birth defects survivors believe are related to their chemical exposures - cleft palates, twisted limbs, cerebral palsy and growth retardation. Twenty-five years later, the company – now owned by Dow Chemical — and its executives have still not been brought to trial, despite extradition and court orders from India.

Dow's chemical wastes in Bhopal have contaminated many acres of Bhopal with dangerous chemicals. Abandoned piles of pesticides and droplets of mercury stain the old factory grounds, and acres of fertile land have been left sterile and

desert-like by chemical seepage from solar evaporation ponds. Children play in the wasteland despite the danger.

In 1999, mercury at levels between 20,000 and 6 million times those considered acceptable were found at the factory site. Carcinogenic and mutagenic chemicals have also poisoned the water supply. Trichloroethene, a chemical that has been shown to impair fetal development, was found at levels 50 times higher than US safety limits. Testing published in a 2002 report revealed poisons such as 1, 3, 5 trichlorobenzene, dichloromethane, chloroform, lead and mercury in the breast milk of nursing women.

To date, thousands of both exposed people and newer residents have been drinking the toxic chemicals in the groundwater surrounding the Dow plant. Water samples from area hand pumps had mercury levels 251 times the allowable limit for Indian pesticide effluent set by the Central Pollution Control Board. Five years after a Supreme Court order to construct a pipeline to provide clean water to the 25,000 people affected, the pipeline has just begun delivering water to some of the affected communities.

Bhopal's abandoned toxic waste site, the poisoned water, the sick generations, and the marginalized people who remain most vulnerable – are mirrored at sites in nearly every nation around the world. NGOs have come together to call attention to this pattern of toxicity in the production, use and disposal of chemicals and to insist that governments and industry address the causes. The half million survivors of the Bhopal disaster have organized themselves, and their calls for a life of dignity through appropriate health care and green economic rehabilitation are echoed by similar communities on several continents.

Table 7. SAICM Implementation by NGOs in South Asia

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Worked to raise awareness on lead free paints at the national level GPA Items: 7, 89, 108, 174, 206	Center for Environmental Justice, Toxics Link	India, Sri Lanka
	Promoted non-burn technologies on biomedical waste disposal GPA Items: 54,258	Centre for Public Health and Environmental Development, Health Care Foundation Nepal, Nepal Forum for Environmental Justice, Society for Direct Initiative for Social and Health Action, Toxics Link	India, Nepal
	Helped the national government of Nepal on alternatives to mercury in health care practices GPA Items: 44, 45, 54, 57, 258	Centre for Public Health and Environmental Development	Nepal
Knowledge and Information	Worked to improve the health and safety conditions of workers in ship breaking factories GPA Items: 146, 147	Bangladesh Occupational and Health Foundation	Bangladesh
	Educated farmers' communities about the hazards of chemical fertilizer and pesticides GPA Items: 36, 159	Balangoda Environmental Forum, CADME Association for Rural and Tribal Development, Gramin Vikas evam Paryavaran Sanstha / Village Development and Environment Group, Kheta Virasat Mission / Traditional Agriculture Mission, Nepal Forum for Environmental Justice	India, Nepal, Sri Lanka,
Governance	Created model on sound municipal waste management by forging private and public partnerships GPA Items: 70, 162, 186, 258	Environment and Social Development Organization, Nav Bhart Jagrti Kendra / New India Awakening Society, North East Educational and Development Society, Toxics Link	Bangladesh, India
Capacity Buliding	Conducted training for municipal officials on zero waste resource management GPA Items: 70, 162, 186, 258, 259	Nav Bhart Jagrti Kendra / New India Awakening Center, Society for Direct Initiative for Social and Health Action	India
	Conducted training program for waste pickers and scavengers on proper handling of waste GPA Items: 70, 162, 186, 260	Chintan Environmental Research and Action Group, Stree Mukti Sgnhatahn / Women Liberation Freedom Organization	India
Illegal Traffic	Raised concerns at the national level on illegal dumping of electronic and other hazardous waste in India GPA Items: 266, 267	Toxics Link	India

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Gaps

Instead of a multi-stakeholder and multi-sectoral approach, most of the time the approach of governments is unidirectional in nature, and major policy decisions on critical chemical safety issues are being taken either unilaterally or only with the influence of industry. The following gaps need to be addressed for an effective implementation of the SAICM process and to achieve the 2020 goal.

1. **Issues of information access and transparency;**
2. **Lack of sufficient public participation at the policy level;**
3. **Issues of implementation and inspection, and vigilance of existing regulations;**
4. **Absence of inter-ministerial coordination committees;**
5. **Issues of resource mobilization to ensure proper management;**
6. **Capacity-building on chemical safety issues;**
7. **Sustained support to grassroots NGOs;**
8. **Building partnerships and networking;**
9. **Inadequate financial resources;**
10. **Lack of coordination among governments, industries and civil society organizations;**
11. **Better North-South cooperation.**

SAICM Implementation by NGOs in South Asia

NGOs in South Asia have actively worked towards achieving all of the SAICM OPS objectives, engaging in a variety of GPA activities. Table 7 illustrates a small number of examples of NGO activities from a much larger list of 60 activities in 4 countries.³⁵ Table 7 shows that NGO activities have included awareness-raising activities on lead in paints and non-burn technologies for medical wastes; occupational safety of ship-breaking workers and farmers; governmental policy issues such as mercury use in health care and municipal waste management; and raising concerns regarding illegal traffic of electronic waste and dumping of other hazardous waste. These activities address GPA items 7, 36, 44, 45, 54, 57, 70, 89, 108, 146, 147, 159, 162, 174, 186, 206, 258, 259, 260, 266, and 267.

Southeast Asia³⁶

In general, the pace of implementation of SAICM in Southeast Asia has been slow, and not commensurate with the intensity of chemical hazards that the people face daily, particularly the most vulnerable groups and communities faced with rapid industrialization.

In many countries, governments have set up processes to review policy on chemicals management, and some have made good progress on important tools to control and prevent toxic pollution. Most have yet to establish multi-stakeholder inter-ministerial committees for SAICM implementation. Several countries still need to ratify major chemicals conventions and/or the Basel Ban of the Basel Convention. Some countries have drafted plans to deal with hazardous substances such as lead and PCBs, and crafted rules for illegal possession or transport of hazardous chemicals. At least one country has made progress on an Integrated Pest Management Program with the help of the Food and Agricultural Organization and NGOs, promoting pesticide risk reduction in agriculture, particularly in rice production. However, more needs to be done to protect human health and the environment from pesticides and other toxic chemicals.

Across the region there has been a resurgence of the toxic waste trade issue, primarily due to bilateral Economic Partnership Agreements that have included as part of tradable “goods” a long list of controlled or banned substances, such as POPs, ozone depleting substances, and hazardous wastes.

While NGOs are involved in all these efforts, few countries in the region have institutionalized mechanisms for public participation in local and national processes on chemical safety. Public access to chemical information and NGO involvement in chemical policy processes remains very limited. Nevertheless, many groups are already contributing to the implementation of SAICM, promoting essential chemical policy reforms, agro-ecological alternatives, food safety, sovereignty and land rights, maternal and child health, occupational safety and health, zero waste and non-incineration solutions, clean production and sustainable consumption.

Zero Waste in the Philippines

EcoWaste Coalition of the Philippines produced a report called “Reducing Garbage and Chemical Pollution through Zero Waste: The Philippine Experience.” At a national chemical safety workshop in January 2009, members of the Coalition discussed and clarified the connections between Zero Waste and the SAICM objectives. In the course of the research for the report, the group raised awareness about the SAICM objectives and organized a media event on chemical issues and SAICM.

Being a whole system approach for dealing with waste and pollution issues, Zero Waste rightly targets essential reforms in the manner by which products are produced, consumed and

discarded by the industry and society to cut both the volume and toxicity of discards. Philippine NGO/CSO activities on Zero Waste and chemical safety include promoting the phase-out of toxic compounds in consumer products and their substitution with non-toxic materials, clean production, extended producer responsibility and non-incineration solutions to municipal, healthcare and industrial waste. These alternatives are promoted through research, information and knowledge sharing, policy development, demonstration projects, campaigns and other interventions that reduce waste and chemical hazards and enhance community health, environmental justice and local self-reliance.

Gaps

1. **The need to ratify and implement key chemical conventions** such as the Basel Ban Amendment and the Stockholm Convention;
2. **Lack of a unified policy framework at the national level** that will cover the full spectrum of chemicals during their entire life cycle;
3. **Lack of holistic legislation and incentives to promote alternatives to toxic processes, technologies and products** such as waste and toxic reduction at source, clean production, extended producer responsibility, green chemistry, ecological agriculture, and zero waste;
4. **The weakness in implementing coherent multi-stakeholder coordination** on chemicals policy development and management, including inter-agency cooperation and adequate involvement of public interest groups;
5. **Deficient database of chemicals** produced, imported, used and disposed of in the country;
6. **Lack of accessible information about chemicals;**
7. **Lack of documentation on the impacts of chemicals on human and ecological health**, particularly on developing fetuses, children, women, and workers in the agriculture, industrial, and waste sectors;
8. **Insufficient resources** to carry out the SAICM Global Plan of Action at the country level;
9. **Ineffective customs regulation and control** to prevent illegal traffic of toxic waste;
10. **Weak civil society surveillance of government and corporate promotion of waste disposal technologies** that discharge dioxins and other POPs as well as greenhouse gases;

11. **Lack of safe, eco-friendly and affordable systems for the treatment and disposal of municipal waste, healthcare waste and hazardous waste.**

SAICM Implementation by NGOs in Southeast Asia

NGOs in South Asia have actively worked towards achieving all the SAICM OPS objectives, engaging in a variety of GPA activities. Table 8 illustrates a small number of examples of NGO activities from a much larger list of 100 activities in 11 countries.³⁷ Table 8 shows that NGO activities have included risk reduction activities on non-incineration techniques for municipal, industrial and medical wastes; participation in development of PCB management guidelines and Stockholm Convention National Implementation Plans; capacity building on waste trade and zero waste management approaches; and study of the legality of waste trade under economic partnership agreements. These activities address GPA items 54, 70, 73, 89, 109, 112, 121, 161, 162, 166, 174, 194, 195, 206, 258, 259, 262, 265, 267, and 273.

Table 8. Examples of SAICM Implementation by NGOs in Southeast Asia

SAICM OPS Objective	NGO Activity and GPA Items	Names of NGOs	Country
Risk Reduction	Promoted non-incineration alternatives for managing municipal, industrial and healthcare waste GPA Items: 54, 70, 258	Bali Fokus, Broga Documentation Group / Reel Power, Broga Semenyih No Incineration Protem Committee, Campaign for Alternative Industry Network, Community Sanitation and Recycling Organization, Consumers' Association of Penang, EcoWaste Coalition, Global Alliance for Incinerator Alternatives, Greenpeace, Health Care Without Harm, Indonesia Toxics-Free Future Network, Jala Sampah / Garbage Network, Penang Environment Working Group, Pesticide Action Network Philippines, Thai POPs Elimination Network	Cambodia, Indonesia, Malaysia, Philippines, Thailand
Knowledge and Information	Translated from English to Thai the "Story of Stuff," distributed to the networks of civil society organizations, schools, media, etc., organized public education forums and a press conference GPA Items: 89, 109, 112, 121	Campaign for Alternative Industry Network, Free Trade Agreement Watch, Thai Working Group for Climate Justice	Thailand
Governance	Reviewed of the draft national guidelines on the management of PCBs GPA Items: 166, 174, 194, 206	Advocates of Science and Technology for the People, EcoWaste Coalition, Global Alliance for Incinerator Alternatives, Pesticide Action Network Philippines	Philippines
	NGOs/CSOs participated in the development of the National Implementation Plan for the Stockholm Convention GPA Items: 195, 206	Campaign for Alternative Industry Network, Consumers' Association of Penang, EcoWaste Coalition, Global Alliance for Incinerator Alternatives, Greenpeace, Pesticide Action Network Philippines, Thai POPs Elimination Network	Malaysia, Philippines, Thailand
Capacity Building	Implemented capacity-building programs on waste minimization and increased resource efficiency, including zero waste resource management, waste prevention, substitution and toxic use reduction, to reduce the volume and toxicity of discarded materials. Researched on the capabilities and problems of local communities in handling hazardous wastes. GPA Items: 70, 73, 161, 162, 258, 259, 262	Bali Fokus, Campaign for Alternative Industry Network, Community Sanitation and Recycling Organization, Consumers' Association of Penang, EcoWaste Coalition, Global Alliance for Incinerator Alternatives, Indonesia Toxics-Free Future Network, Jala Sampah / Garbage Network, Penang Environment Working Group	Cambodia, Indonesia, Malaysia, Philippines, Thailand
Illegal Traffic	Conducted case studies on toxic waste trade under the Japan-Philippines and the Japan-Thailand Economic Partnership Agreements and the ASEAN-JAPAN Comprehensive Economic Partnership Agreement (AJCEPA) GPA Items: 265, 267, 273	Ban Toxics, Campaign for Alternative Industry Network, EcoWaste Coalition, Global Alliance for Incinerator Alternatives	Philippines, Thailand

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Elevating SAICM Awareness in the Health and Trade Union Sectors

In the health care sector, several global networks have made progress in implementing SAICM. **Health Care Without Harm (HCWH)** is an international coalition of nearly 500 organizations in more than 50 countries, working to transform the health care sector so it is no longer a source of harm to people and the environment. In 2008, Health Care Without Harm and the World Health Organization (WHO) co-established a global initiative to achieve the virtual elimination of mercury-based thermometers and sphygmomanometers over the next decade and their substitution with accurate, economically viable alternatives. This collaboration is a component of the United Nations Environment Programme's (UNEP) Mercury Products Partnership, which seeks to eliminate mercury in manufactured goods and is establishing best practices.

This initiative is based on WHO's policy to phase-out mercury-based medical devices, and also grounded in HCWH's more than ten years of experience working with the health sector, national governments and inter-governmental organizations in North America, Europe, Asia, Africa and Latin America. In addition to policy advances for mercury substitution in the European Union and the US, HCWH's networks recently achieved the creation of model national policies in South East Asia and Latin America. First, in August 2008, the Philippines Department of Health mandated the substitution of all mercury-based medical devices in the health care sector by 2010. Then in February 2009, the Argentine Minister of Health issued a resolution ending the purchase of mercury thermometers and sphygmomanometers in the country. HCWH is also carrying out work for the elimination of mercury in health care in Brazil, Chile, Honduras, India, Mexico, South Africa, Vietnam, and several other countries.

The **World Federation of Public Health Associations (WFPHA)** is a nongovernmental, multi-professional organization that brings together over 70 national and regional Public Health Associations, as well as regional associations of schools of public health that have actively joined the SAICM outreach effort.

In 2008 both WFPHA and Health Care Without Harm adopted positions endorsing SAICM, and since then have launched a joint outreach effort encouraging their members to give their support as well. So far, 53 national WFPHA associations have debated and endorsed SAICM and over 30 are in the process of considering endorsement.

In June 2008, after debate about chemical policy reform and support by several state associations, the American Medical Association (AMA) endorsed SAICM. The AMA and the Outreach Campaign carried the SAICM issue to the World Medical Association (WMA), a global body representing over 80 national medical associations, at its meeting in Seoul in October 2008. The WMA's working group on the environment at that meeting slated it for activity beginning in January 2010. The AMA's resolution will be circulated to member organizations in the interim and a position paper will be developed for debate.

The **International Society of Doctors for the Environment (ISDE)** is an NGO of health professionals that includes 38 national member organizations around the world. One of the main topics in the agenda of ISDE is chemical safety and health. ISDE works on epidemiological research, and educational/ informational activities, and is involved in advocacy at national and international levels. ISDE represents the science NGOs at the Forum Standing Committee of the Intergovernmental Forum on Chemical Safety (IFCS) and the health NGOs in the SAICM Process. ISDE is involved internationally in activities on implementation of the Basel, Rotterdam and Stockholm Conventions, and is involved in activities related to the effects of chemicals on the health of vulnerable populations and populations at risk, especially children and women of reproductive age.

ISDE disseminated information on the SAICM process internationally and has participated in the organization of the SAICM process as a member of the "Friends of the Secretariat" and as a member of various working groups on Emerging Policy Issues. AAMMA (**Argentinian Association for Doctors for the Environment**, the Argentine national member of ISDE) is responsible for a SAICM Quick Start Programme project to minimize the domestic sources of mercury to reduce exposure of children at the community level in six countries in South America (Argentina, Bolivia, Chile, Paraguay, Peru, and Uruguay). ISDE has translated educational materials on the SAICM process into Spanish and Italian and distributed them widely to professional audiences. ISDE also has activities on: chemicals in products, particularly, phthalates, flame retardants and others; food chemical

pollution; pesticides and health (rural and household uses); nanotechnology - nanoparticles and health effects; and other topics.

Women in Europe for a Common Future

Women in Europe for a Common Future (WECF) is a network of 90 public interest women's and environmental organizations in 37 countries in Western Europe and Eastern Europe, Caucasus, and Central Asia (EECCA).

In Western Europe WECF is actively participating in diverse national governmental stakeholder working groups on several issues concerning chemical policy, including nanotechnology. Also, WECF is part of a European chemical working group, mainly involved with the European regulation on chemicals under REACH. In this work, WECF collaborates with the **Health and Environment Alliance (HEAL)** in Belgium, Germany, France, and the Netherlands. Together with European NGOs, WECF has an expert seat in the European Chemicals Agency (ECHA), the institution that manages and executes the technical, scientific, and administrative obligations of REACH. On the substitution of chemicals, WECF cooperates with the **International Chemical Secretariat (Chemsec)** and other environmental NGOs to promote **The REACH SIN* List (*Substitute It Now!) 1.0**, a list of chemicals that can and should be substituted.³⁸ WECF organized a conference in the Netherlands on substitution of chemicals with the cooperation of companies that already engage in substitution. It has also organized different conferences in the European Parliament on children and environment, and promoted safer European regulatory policies on cosmetics, pesticides and toys. For young parents, the Nesting program in Estonia, France, Germany, Greece, Hungary, Netherlands, Spain, and UK helps them to create a healthy environment for newborns with a website in seven languages, workshops for health professionals, and awareness-raising about children and chemical safety.

In the EECCA region, WECF worked with partner NGOs to develop an inventory of the use of asbestos in Kazakhstan, Russia, and Ukraine and raise awareness about the issue. In Armenia, Kazakhstan and Ukraine, WECF and partner organizations have drawn attention to the problem of obsolete pesticide stockpiles, and cooperated with the local and national authorities to isolate or remove the stockpiles and reduce the threat to humans and the environment.

Based on WECF's experience, the most important SAICM issues that need to be addressed are:

1. Lack of knowledge of environmental effects on health;
2. Implementing the precautionary principle;
3. Implementing the polluter pays principle;
4. Banning asbestos in the Eastern Europe, Caucasus, and Central Asia region;
5. Labeling nanomaterials in consumer products;
6. Eliminating toxic chemicals from toys and cosmetics;
7. Reducing and eliminating pesticides, POPs and other hazardous chemicals.

The Role of Trade Unions in SAICM Implementation

Chemical hazards are currently a major cause of occupational mortality in the world. The International Labour Organization (ILO) estimates that hazardous substances kill about 438,000 workers annually, and there is no global data available on the percentage of occupational diseases related to chemicals exposure. Trade unions have insisted for decades on putting into practice certain key points: the precautionary principle, the substitution principle, clean production, and best available techniques. However, for Trade Unions to have a full and effective role, it is necessary that the adequate legal and structural pre-conditions are set up.

Risk reduction — Trade Unions seek to reduce risk based on a “hierarchy of controls,” which prioritizes elimination of the hazard at the source, before applying personal protective equipment. Substitution for most hazardous chemicals is a priority (namely CMR -Carcinogen, Mutagen and Toxic to reproduction, PBT -Persistent Bioaccumulative and Toxic, endocrine disruptors and heavy metals). Trade Unions have worked on producing guides on substitution, and there are concrete examples of substitution in the workplace. For instance, the **Building and Wood Workers' International (BWI)** Trade Union promotes the use of safer solvents, fillers and preservatives. The risk assessment necessary to make an appropriate decision on whether and how preventive measures should be adopted can be difficult. Many Unions combine a quantitative assessment with a qualitative one, determining action from available documentation and the information from workers.

Knowledge and Information — Due to the lack of knowledge about the inherent hazardous properties of

most chemicals, many chemicals are used in the workplace while their potential effects are barely known, or known too late. Prevention and Precautionary Principles in all matters relating to the uses of chemicals and related substances, especially for multiple exposures and emerging chemicals of concern (e.g. endocrine disruptors) are important elements of Trade Union policy.

Trade Unions have contributed with their own reports to provide information and knowledge on chemicals and chemicals management. For example, the **European Trade Union Institute** has produced various reports, most recently “Production and reproduction: Stealing the health of future generations.”³⁹ Trade Unions have also developed databases for members, such as RISCTOX set up by the **Union Institute of Work, Environment and Health from CCOO-Spain (ISTAS-CCOO)**.

Governance — In the development of a policy framework on chemicals management, the **International Trade Union Confederation (ITUC)** was involved in the SAICM negotiation process. International Labour Organization (ILO) Conventions (170 on Safety in the Use of Chemicals at Work and 155 on Occupational Health and Safety) are of relevance particularly in developing countries where they represent important levers for the improvement of working conditions. Trade Unions have become active partners for their ratification and implementation.

At national level, social dialogue, which includes negotiations and agreements among representatives of governments, employers and workers, is an important tool to achieve SAICM objectives. At workplace level, collective bargaining is an important tool for raising living standards and improving working conditions. Unfortunately, collective bargaining is under attack by some employers and governments, both in developed and developing countries. It rarely exists in the informal sector or in small, traditional enterprises. As a result, the majority of the world’s workers do not yet enjoy the benefits of effective collective bargaining which would provide a framework to advance the sound management of chemicals.

Capacity Building and Technical Cooperation — Trade Unions devote considerable resources to the education and training of members, including on chemical safety. Training has played an increasingly important role in the labor world. Increased Trade Union engagement in various decision-making bodies has required better trained workers. In order to be able to defend their rights, workers have been demanding more training and information.

There are numerous examples of seminars and courses on chemical management to increase worker capacities on hazardous chemicals, such as identification of chemicals used in the workplace, risk assessment, and assistance in the implementation of preventive measures. Activities and courses are also organized within the Occupational Health and Safety Committees (fora at workplaces between workers and management to discuss health and safety).

The Quick Start Programme has also contributed to support capacity building of workers and trade unions in Brazil, Chile and Uruguay since November 2008. The overall goal of this project is to enhance Trade Union knowledge, capacities and technical tools to reduce chemical risk and to promote the sound management of chemicals in three different economic sectors.

Illegal Traffic — Workers, particularly dockers and transport workers from developing countries, are the first to suffer from illegal trafficking. The International Trade Union Confederation (ITUC) and other Unions spoke up when the ship Probo Koala offloaded 400 tonnes of gasoline, water and caustic washing near Abidjan in Côte d’Ivoire, causing six deaths and 9,000 injuries. Illegal trafficking goes hand in hand with the silent tragedies of illness and death.

Finally, the NGO/CSO Global Common Statement on SAICM has been endorsed by The International Trade Union Confederation (ITUC).⁴⁰

Conclusion

The SAICM Global Outreach Campaign and parallel efforts have helped broaden the awareness of SAICM in all regions. More than 1,000 public interest NGOs and CSOs in more than 100 countries have pledged to help implement SAICM to achieve its objectives. NGOs and CSOs have implemented over 300 activities from the local to the international level to promote chemical safety. Over 70 national and regional Public Health Associations and schools of public health have taken note of SAICM and agreed to contribute to its implementation. International and national trade union federations are also encouraging their members to contribute to SAICM implementation. The *NGO/CSO Global Common Statement on SAICM* has been a very useful tool in these efforts.

Since 2006, SAICM implementation has advanced, but the pace has been slow and uneven. Overall, SAICM implementation needs a sustainable financial mechanism and strong links to sustainable development. In the SAICM Dubai Declaration, governments acknowledged that public health and environmental NGOs, trade unions and other civil society organizations have made important contributions to promoting chemical safety, and they stated their intent to engage actively in partnerships with civil society in SAICM implementation. This requires financial resources to build NGO capacity and to support SAICM activities so that the commitment of civil society to chemical safety can be harnessed to accomplish the 2020 goal.

Annex 1 – Mini-Grant Projects Supported by the Global Outreach Campaign on the Strategic Approach to International Chemicals Management

Country	Organization	Project Title
Albania	EDEN Center	The Rubik Case Study – Raising Awareness about Chemicals from Abandoned Industrial Facilities in the Central and Eastern European Region
Argentina	Argentinian Association for Doctors for the Environment	Capacity building for Risk Reduction: Chemical Safety and Health Effects.
Argentina	Anti-Incinerator Citizens Coalition	Tools for community public education on incinerators
Armenia	Armenian Women for Health and Healthy Environment (AWHHE)	SAICM- Global Commitment to Protection of Health and the Environment – campaign in Armenia
Azerbaijan	Ecological Society “Ruzgar”	SAICM Outreach campaign in Azerbaijan
Bangladesh	Bangladesh Occupational Safety, Health and Environment Foundation (OSHE)	Promote exchange of information on successful experiences and projects related to chemical, occupational safety and health in Bangladesh
Bangladesh	Environment and Social Development Organization (ESDO)	Enhancing Knowledge and Dissemination of Information through a Workshop
Belarus	Center of Environmental Solutions (formerly FRI)	Public website on chemical safety in Belarus
Benin	The Action Group for the Promotion of Flora and Fauna	Contribution to the study of the problems of handling chemicals (POPs) by mattress-maker craftsmen in Benin and Togo.
Bolivia	Center of Studies and Investigation of Socioenvironmental Impact	First informative journey about SAICM for addressing problems of pesticides in Bolivia
Brazil	Association for Environmental Protection of Cianorte	Production of educational material for raising awareness on SAICM in Brazil
Croatia	Green Action	Research and public education on PCB ash in a burned incinerator site
Czech Republic	Arnika- Toxics and Waste Programme	Regional SAICM Implementation Report
Egypt	Day Hospital Institute for Development and Rehabilitation	Regional SAICM Implementation Report
Ethiopia	Institute for Sustainable Development (ISD)	Information dissemination on the status of DDT use in the Ethiopian Rift Valley
Georgia	"EcoVzgliad" Union for Sustainable Development	SAICM Global Outreach Campaign in Georgia
Ghana	Environment Youth Action Network (EYAN)	Development of education and awareness creation strategy and materials for the sound management of pesticides in Ghana
India	Toxics Link	Regional SAICM Implementation Report
India	Society for Direct Initiative for Social and Health Action (DISHA)	Toxic Chemicals – Concern of Coastal Fishers

Country	Organization	Project Title
India	Gramin Vikas Evam Paryavaran Sanstha (GVEPS)	Use of best practices of Organic Farming for Sustainable Ecodevelopment
India	Chintan Environmental Research & Action Group	To build the capacity of 300 waste scavengers on Ghazipur Landfill to minimize exposure to toxics during their work and help them advocate for this
Indonesia	Gita Pertiwi	Capacity building workshop for NGO of SAICM and National regulation of chemical management in Indonesia.
Jordan	Land and Human to Advocate Progress	State of SAICM implementation in Jordan
Kenya	iLima Kenya	Awareness creation on SAICM and chemicals safety in Kenya
Kyrgyzstan	Civic Environmental Foundation UNISON	Promotion of the SAICM Global Outreach Campaign in Kyrgyzstan
Lebanon	AMWAJ of the Environment	SAICM in Lebanon
Malaysia	Sarawak Dayak Iban Association (SADIA)	Community Monitoring and International Education
Mexico	Action Network on Pesticides and Alternatives in Mexico (RAPAM)/Center of Analysis and Action on Toxics and their Alternatives (CAATA)	Regional SAICM Implementation Report
Nepal	Centre for Public Health & Environmental Development (CEPHED)	Capacity and Awareness Building Training Workshop for Chemical Management in Nepal
Panama	Action Network on Pesticides and Alternatives for Latin America - Panama (RAP-AL-Panama)	The design of a brochure to help construction workers in Panamá to minimize the risks of the substances to which they are exposed
Philippines	EcoWaste Coalition	Reducing Garbage and Chemical Pollution through Zero Waste
Philippines	Pesticide Action Network (PAN) Philippines	Training on Community Pesticide Action Monitoring for Public Interest Groups in Southern Mindanao
Philippines	Pesticide Action Network (PAN) Philippines	Regional SAICM Implementation Report
Philippines	BAN Toxics	Facilitating Toxic Trade in Southeast Asia: A Report on Japan's Economic Partnership Agreements in the Region
Philippines	Global Alliance for Incinerator Alternatives (GAIA)	Regional SAICM Implementation Report
Philippines	Kalikasan People's Network for the Environment	Awareness Raising on Southeast Asia Regional Action Plan on SAICM Implementation in the Philippines
Russia	Volgograd-Ecopress	SAICM Global Outreach Campaign in Volgograd region of Russia
Russia	Let's help the river/Dront	SAICM Global Outreach Campaign in Nizny Novgorod region of Russia
Russia	SPES	SAICM Global Outreach Campaign in Nizny Novgorod region of Russia
Russia	Eco-Accord	Regional SAICM Implementation Report
Senegal	Pesticide Action Network (PAN) Africa	Summary evaluation of the implementation of the principle international legal instruments on chemicals management
Sri Lanka	Balangoda Environmental Forum	Introduction of eco- friendly pesticide controlling compound and devices for rural farming community
Sri Lanka	Center for Environmental Justice (CEJ)	Education and awareness on chemical pollution in Sri Lanka
Sri Lanka	Sri Lanka Green Movement	Controlling the emissions of dioxin and furan through the burning of industrial waste at a cement factory

Country	Organization	Project Title
Syria	Environmental Protection & Sustainable Development Society	SAICM Awareness Activity
Tanzania	Agenda for Environment and Responsible Development (AGENDA)	Regional SAICM Implementation Report
Thailand	Campaign for Alternative Industry Network (CAIN)	Education about the Thai Right to Know about Chemical Substance and Pollutant Release Information
Tunisia	The Mediterranean Network Association for Sustainable Development (AREMEDD)	Capacity building and public awareness to enhance national and regional SAICM
Uganda	Uganda Network on Toxic Free Malaria Control (UNETMAC)	Public awareness about the dangers of using DDT and the importance of SAICM
Ukraine	Mama-86	Sound management of chemicals in Ukraine in the framework of the SAICM
Zambia	Zambia Consumers Association	Campaign to Eliminate Lead-Based Paints in Zambia

Abbreviations: OPS, Overarching Policy Strategy; GPA, Global Plan of Action; NGO, non-governmental organizations

Annex II – NGO/ CSO Global Common Statement on the Strategic Approach to International Chemicals Management⁴¹

Recognizing that “fundamental changes are needed in the way that societies manage chemicals,”⁴² Environment Ministers, Health Ministers and other delegates from over 100 governments together with representatives of civil society and the private sector declared in Dubai, February 6, 2006, that “the environment worldwide continues to suffer from air, water and land contamination, impairing the health and welfare of millions.”⁴³ They adopted the *Strategic Approach to International Chemicals Management* (SAICM), a global plan of action whose stated goal is: “to achieve the sound management of chemicals throughout their life-cycle so that, by 2020, chemicals are used and produced in ways that lead to the minimization of significant adverse effects on human health and the environment.”⁴⁴

The SAICM addresses both agricultural and industrial chemicals; covers all stages of the chemical life-cycle of manufacture, use and disposal; and includes chemicals in products and in wastes.

We, (*Name of organization*), a civil society organization, join in this global effort to work for a future where exposure to toxic chemicals is no longer a source of harm.

We agree with the SAICM:

- On the need to take action to “prevent the adverse effects of chemicals on the health of children, pregnant women, fertile populations, the elderly, the poor, workers and other vulnerable groups and susceptible environments.”⁴⁵
- On the need to “apply the precautionary approach”⁴⁶ and “give priority consideration to the application of preventive measures such as pollution prevention.”⁴⁷

- On the need to address the “lack of capacity for managing chemicals in developing countries and countries with economies in transition, dependency on pesticides in agriculture, exposure of workers to harmful chemicals and concern about the long-term effects of chemicals on both human health and the environment.”⁴⁸
- With the commitment to “promote and support the development and implementation of, and further innovation in, environmentally sound and safer alternatives, including cleaner production, informed substitution of chemicals of particular concern and non-chemical alternatives.”⁴⁹
- On the need to promote “adequate transfer of cleaner and safer technology”⁵⁰ and with a call to make available both “existing and new sources of financial support.”⁵¹
- On the need to promote “capacity-building, education and training and information exchange on sound management of chemicals for all stakeholders.”⁵²
- That “the sound management of chemicals is essential if we are to achieve sustainable development, including the eradication of poverty and disease, the improvement of human health and the environment and the elevation and maintenance of the standard of living in countries at all levels of development.”⁵³
- With the commitment to “promote and support meaningful and active participation by all sectors of civil society, particularly women, workers and indigenous communities, in regulatory and other decision-making processes that relate to chemical safety.”⁵⁴
- With the commitment to facilitate access to “information and knowledge on chemicals throughout their life cycle, including the risks that they pose to human health and the environment.”⁵⁵

We commit ourselves and call upon all stakeholders including governments, nongovernmental organizations, the private sector, intergovernmental organizations and others to work together to implement SAICM policies, and to reform domestic chemicals assessment and management laws, policies and practices to achieve the 2020 goal in all countries.

Endnotes

- 1 SAICM Overarching Policy Strategy paragraphs 9 and 16
- 2 Health Care Without Harm (HCWH); International POPs Elimination Network (IPEN); International Society of Doctors for the Environment (ISDE); Pesticide Action Network International (PAN); Women in Europe for a Common Future (WECF); and the World Federation of Public Health Associations (WFPHA)
- 3 <http://www.ipen.org/campaign/statement.html>
- 4 Organizations from 107 countries endorsed the Common Statement. Of these, 90 were from developing or transition countries. The full list is at <http://www.ipen.org/campaign/signed.html>.
- 5 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 6 SAICM High Level Declaration
- 7 <http://www.saicm.org>
- 8 <http://www.saicm.org>
- 9 <http://www.ipen.org/campaign/who.html>
- 10 <http://www.ipen.org/campaign/statement.html>
- 11 Organizations from 107 countries endorsed the Common Statement. Of these, 90 were developing or transition countries. The full list is at <http://www.ipen.org/campaign/signed.html>.
- 12 The booklets can be found at <http://www.ipen.org/campaign/education.html>.
- 13 <http://www.noharm.org>
- 14 <http://www.ipen.org>
- 15 <http://www.isde.org>
- 16 <http://www.pan-international.org>
- 17 <http://www.wecf.eu>
- 18 <http://www.wfpha.org>
- 19 <http://www.sustainlabour.org>
- 20 SAICM High Level Declaration
- 21 <http://www.ipen.org/campaign/education/crsaicm.html>
- 22 Including reports and examples from nine countries: Ethiopia, Kenya, Mauritius, Mozambique, Nigeria, South Africa, Tanzania, Uganda, and Zambia
- 23 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 24 Including reports and examples from fourteen countries: Albania, Belarus, Bulgaria, Croatia, Czech Republic, Estonia, Hungary, Latvia, Macedonia, Poland, Romania, Slovakia, Slovenia, and Turkey
- 25 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 26 Including reports and examples from eight countries: Armenia, Belarus, Kazakhstan, Russia, Serbia, Tajikistan, Ukraine, and Uzbekistan
- 27 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 28 Including reports and examples from nine countries: Burkina Faso, Cameroon, Congo, Guinea Bissau, Mali, Morocco, Niger, Senegal, and Togo
- 29 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 30 Including reports and examples from fifteen countries: Argentina, Bolivia, Brazil, Chile, Costa Rica, Cuba, Dominican Republic, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Uruguay, Venezuela
- 31 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 32 Including reports and examples from nine countries: Egypt, Jordan, Lebanon, Morocco, Palestine, Sudan, Syria, Tunisia, and Yemen
- 33 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 34 Including reports and examples from six countries: Bangladesh, Bhutan, India, Nepal, Pakistan, Sri Lanka
- 35 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 36 Including reports and examples from five countries: Cambodia, Indonesia, Malaysia, Philippines, and Thailand
- 37 The full list can be found at <http://www.ipen.org/campaign/education/crsaicm.html>.
- 38 <http://www.chemsec.org/list/>
- 39 <http://hesa.etui.org/uk/publications/pub44.htm>
- 40 The ITUC represents 168 million workers in 155 countries and territories and has 311 national affiliates. The Common Statement was endorsed only by the ITUC, not each affiliate.
- 41 The *Strategic Approach to International Chemicals Management* (SAICM) comprises three core texts: *The Dubai Declaration*, which expresses the commitment to SAICM by Ministers, heads of delegation and representatives of civil society and the private sector; *The Overarching Policy Strategy*, which sets out the scope of SAICM, the needs it addresses and objectives; and *A Global Plan of Action*, which sets out proposed work areas and activities for implementation of the Strategic Approach. These texts can be found in all UN languages at: <http://www.chem.unep.ch/saicm/SAICM%20texts/SAICM%20documents.htm>
- 42 SAICM Dubai Declaration paragraph 7
- 43 SAICM Dubai Declaration paragraph 5
- 44 SAICM Overarching Policy Strategy paragraph 13
- 45 SAICM Overarching Policy Strategy paragraph 7 (c)
- 46 SAICM Overarching Policy Strategy paragraph 14 (e)
- 47 SAICM Overarching Policy Strategy paragraph 14 (f)
- 48 SAICM Dubai Declaration paragraph 6
- 49 SAICM Overarching Policy Strategy paragraph 14 (j)
- 50 SAICM Overarching Policy Strategy paragraph 10 (b)
- 51 SAICM Overarching Policy Strategy paragraph 19
- 52 SAICM Global Plan of Action, Executive Summary, paragraph 8 (i)
- 53 SAICM Dubai Declaration paragraph 1
- 54 SAICM Overarching Policy Strategy paragraph 16 (g)
- 55 SAICM Dubai Declaration paragraph 21

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