



15 December, 2014

Thank you Mr. President,

IPEN would like to thank the SAICM Bureau and the Secretariat for their work in the preparation of the Overall Orientation and Guidance document. This important document covers a lot of ground in a short number of pages. We would like to provide some initial overall comments and save specific text for the contact group.

The 2020 goal is an output goal – It says that we will minimize adverse effects on human health and the environment. If we achieve this goal, then something very important will change in the world. However, the 6 core activity areas in the OOG are primarily process goals. We think the OOG needs to incorporate some tangible output goals so that we can focus our efforts and know if we achieved them. For example, the OOG should include quantifiable milestones for the implementation of emerging policy issues. The relative levels of resources allocated to implement actions on EPIs and other core activities should be examined to ensure that proper financing is secured for the EPI activities and other key core functions for SAICM implementation to pursue the 2020 Goal successfully.

As we take stock of the progress in implementing SAICM we believe statements of gaps should be included because SAICM-related implementation activities that can yield results in actual minimizing toxic exposures are still only beginning. Many of these statements of gaps are actually present in INF2 and could simply be moved into the OOG.

We suggest that core activity (b) should include establishing inventories of safe substitutes and alternative techniques, including non-chemical alternatives and ecological agriculture. And Core activity (c) should include transfer of environmentally-friendly techniques that comply with the chemicals conventions and are consistent with SAICM.

Financing and its implications should be a new core activity going forward – especially since so far, the funding for SAICM has been for enabling activities – not implementation. This section should include some tangible goals for



**a toxics-free future**

achieving cost recovery instruments so that costs of sound management of chemicals and wastes are internalized by industry. The topic of costs internalization was actively discussed in all SAICM Regional Consultations, prior to ICCM3 and was widely supported. The suggested new core activity should also include the need to attract a broader base of donors, substantial increase of the GEF resources on chemicals and wastes and amend the Special Programme so that the work of all SAICM stakeholders can be supported.

The OOG is an important guidance for SAICM implementation between now and 2020. However, in no way should the OOG be used to create the impression that we are somehow just about to achieve the 2020 goal. SAICM has managed to create some meaningful policy frameworks with very little money. Now we need to translate these frameworks into actually reducing harm on the ground up to and beyond 2020.

Thank you Mr. President.