

2 April, 2019

IPEN Intervention on Vision and Scope

Given by Sofia Chavez, CASA CEM- Vias Verdes A.C., Mexico

Thank you, Madame President,

First of all I thank Uruguay for the warm welcome. On behalf of the Mexican NGO CASA CEM- Vias Verdes A.C. and as a Participating Organization of IPEN, we think that the vision of the successor of SAICM should be **timeless**, as chemicals and waste issues are always growing and ongoing. However, it should include specific timeline targets. It is also important that it includes **prevention and precaution** as key principles to protect human health and the environment from unsound management of chemicals and wastes.

The SAICM2.0 scope should include **the entire lifecycle and all wastes** as noted in SDG12.4, which states the importance of achieving "the environmentally sound management of chemicals and all wastes throughout their lifecycle...". The term "all wastes" encompass hazardous waste, household waste and associated waste. Narrowing our scope to only hazardous waste would lead to endless discussions about what "hazardous" is, and would likely open the way to big loopholes. From our extensive experience working in many developing countries, we can confidently say that in many cases there is no segregation of hazardous waste from other wastes. This practice normally leads to hazardous waste being left untreated and dumped. On the other hand, to include only associated waste would leave out wastes of concern such as POPs, plastics and other polluting waste.

It is also important to include environmental integrity in the scope. That is, linking chemical safety to biodiversity and land protection concepts that are especially relevant to agroecology and sustainable food production.

Another item we wish to stress is the circularity concept. As currently practiced, circularity includes toxic recycling, which undermines sustainability of a circular economy, and for this reason, we stress that the text should clearly state a goal of non-toxic circularity.

The links between chemical safety and human rights, which are mainstream principles and part of UNEP's work, should also be stressed in the outcome document from Open Ended Working Group 3. This linkage is missing in the current Co-Chairs paper.

Thank you Madame President for considering our view.