IPEN
for a toxics-free future

IPEN Views on

Global Science-Policy Efforts In Relation To Chemicals And Waste

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A draft resolution has been put forward to the Fifth meeting of the United Nations Environment Assembly (UNEA 5), with a proposal to establish a new Science-Policy Panel to support action on chemicals, waste and pollution.

IPEN has engaged in the science-policy discussions under the BRS- and Minamata Conventions, SAICM and UNEA for many years. We look forward to further discussing how increased international action on chemicals and waste can be facilitated. This paper aims to share our views on this topic in contribution to both the science-policy discussions at UNEA and in other fora.

IPEN believes that sound, independent, science should determine national, regional and international policies on chemicals and waste, based on the precautionary principle, the industry duty to disclose information, and citizens' right to know. Access to a healthy and sustainable environment is an universal human right, as are science-based policies to protect the human rights of individuals and communities exposed to hazardous substances and waste. To date, this is far from reality and decisive action is needed to address the significant threat to human health and the environment posed by the current production and use of hazardous chemicals and their projected dramatic increase. This is underscored by a recent scientific publication showing that the chemical pollution planetary

boundary is now the fifth of nine planet boundaries that have been crossed.

We appreciate the intention behind the UNEA draft resolution to accelerate precautionary action to protect human health and the environment. Increased engagement by the independent scientific community to achieve this important goal is vital and very much welcomed. At the same time, there is currently a massive lack of resources to address the already overwhelming chemical pollution in many countries. For example, a report presented at Stockholm Convention COP 10 estimated that almost around 5 billion USD would be needed just to deal with all POPs currently listed under the Convention.[1] Funding is a key obstacle identified e.g. in the SAICM evaluation to move forward towards sound management of chemicals and waste in Low- and Middle Income Countries (LMICs). Until the chemical industry provides the funds needed to comprehensively address the impacts of their products, it is vital that any new efforts are specifically targeted to have as much impact as possible using limited means.

Together with this limitation, the experiences from already ongoing robust science-policy processes such as the Stockholm Convention POPs Review Committee must be taken into account when assessing the information presented in the Assessment of options for strengthening the science-policy interface and deciding on the path forward.

1 UNEP/POPS/COP.10/INF/33

IPEN THEREFORE HIGHLIGHTS THE FOLLOWING KEY LESSONS LEARNED/ VIEWS:

Focus on chemicals: Any new effort to strengthen the science-policy interface must be specifically focused on chemicals to be effective. This focus will help identify specific policies to prevent harm, as well as identify and hold producers of toxic chemicals accountable. Broadening the scope to include the more diffuse term "pollution" will inevitably limit the impact of such an effort since the sources, actions and related policies are much more diverse and complex.

Take the inevitable political dimension of science-policy into account: There are numerous examples of political considerations and related financial interests being the deciding factors despite clear scientific recommendations in the international policy space for chemicals and waste. One such example is the joint UNEP-WHO landmark report on the State of the Science of Endocrine Disrupting Chemicals released in 2013. This lays out the scientific consensus around these chemicals and the need to take action, accompanied by a summary for decision makers. Still, almost ten years after the release of this report, endocrine disrupting effects are only in very limited instances guiding policy decisions. Not only is bisphenol A still in use despite being a known EDC since the 1930s, a wide range of plastic additives with EDC properties are allowed for use, including in food contact materials.

Make precaution the deciding factor: an effective science policy effort should serve as an early warning and horizon scanning

function, taking all good quality science into account and not only reactive, regulatory assessments. It must be built on the precautionary principle and require policy relevant guidance to governments be aligned with the best available scientific evidence. However, the scientific method is based on the need to always seek further knowledge. It is therefore vital that such an effort does not delay any policy decision and become an excuse for inaction but recognize that protective policies must be put into place even where there is no full scientific certainty. Also, it should therefore not be directly coupled to already existing policy frameworks.

Political and financial conflicts of interest must be avoided: much of the research on hazardous chemicals is conducted through industry funded projects or internally by the industry itself for specific purposes. These cannot be considered independent scientists or sources in any policy relevant scientific effort. Greenwashing, corporate capture and conflicts of interest are known threats in all science-policy efforts. In addition, countries' economic interests and politics can explicitly or implicitly put pressure on scientists, even to the point of harassment and threats. Finally, there are many well known cases of supposedly independent scientists sowing doubt on behalf of industry interests, such as the case of 19 EU "experts" on EDCs manufacturing doubt in the EU.

Aim to turn off the tap: Effective guidance should lead to policies that prevent the production, use and recycling of toxic chemicals. This relates both to legacy chemicals, chemicals currently in use but also, crucially, prevents the use of novel chemicals with potential hazardous characteristics. There are numerous examples of groups of chemicals that should have been prevented from use such as the PFAS, brominated flame retardants and bisphenols in response to the early signs of concern, but are now instead causing widespread harm as well as huge financial impacts.

Global scientific data inequities must be addressed: a majority of the research and available studies on the impact of chemicals are from high-income countries and many of these are behind paywalls. At the same time, many Low- and Middle- Income Countries (LMCIs) are especially impacted by hazardous chemicals. Therefore, citizen science and local and traditional knowledge, innovations, and practices of Indigenous peoples and efforts by local communities are important contributions that need to be equally considered. In addition, it underscores the need to focus science-policy efforts purely on hazard to make them globally applicable. Also, women as a group especially impacted by chemicals and waste must be considered. Finally, independent analytical and research capacity in universities in LMIC needs to be built and supported.