



The Center for International Environmental Law (CIEL) would like to thank Switzerland and its co-sponsors for the draft resolution on the Sound Management of Chemicals and Waste.

CIEL welcomes the proposal to extend the duration of the Special Programme. We understand the **integrated approach to financing** is one of the key sections of the omnibus draft resolution, and we would like to make the following suggestions:

1. Include an additional preambular paragraph to **Note the ongoing discussions on financial considerations under SAICM beyond 2020 and proposals to establish a novel structure to implement the integrated approach to financing.**

Rationale:

The [Virtual Working Group](#) (VWG) proposed by the ICCM5 Bureau and the co-chairs of the intersessional process included a dedicated VWG on the issue of financial considerations. Dozens of countries, International Organizations, and other SAICM Stakeholders participate in this VWG. They have been exploring ways to improve the dire current chemical and waste cluster financing situation (see, for example, the report presented at Stockholm Convention COP10 that estimates the current financial need to deal with POPs listed under the convention at close to 5 billion USD).¹

Several innovative proposals have been put forward in the context of those discussions, including: The African Group, [which recommended on behalf of its 54 members](#), a new structure to implement the industry component of the Integrated Approach to financing, “The Chemical Industry shall contribute just 0.5% of the industry’s annual revenue to fund the implementation of SAICM National Implementation Plans which will include but not limited to chemical and waste management activities, clean-up of hazardous waste and remediation of contaminated areas. [...]”;² and [IPEN’s related proposal](#) to impose a globally coordinated tax or fee of 0.5% on the production value of a small number of basic chemicals (or feedstock chemicals) to fund the sound management of chemicals and waste.³ It appears important to reference those ongoing discussions to inform the OECPR and UNEA process.

¹ [UNEP/POPS/COP.10/INF/33](#)

² Submission to the Virtual Working Group 4: Africa Group on Financing the Sound Management of Chemicals and Wastes beyond 2020, November 13, 2020, pages 2-3.

³ Submission to the Virtual Working Group 4: IPEN submission on financing consideration, November 13, 2020, page 4.

2. Include a new operative paragraph:

Decide to review section V of the Terms of Reference for the Special Programme, and to include the following new paragraph 7 bis:

Civil Society organizations shall also be eligible to present project proposals to be funded by the Special Program, subject to endorsement by the countries hosting the projects.

Rationale:

Section V of the Terms of Reference of the Special Programme, “Eligibility for support from the Special Programme,” is currently limited to developing countries.

The Dubai Declaration on International Chemical Management recognizes: "Non-governmental public health and environmental organizations, trade unions and other civil society organizations have made important contributions to the promotion of chemical safety."⁴

Furthermore, the specific impacts of civil society projects for the sound management of chemicals are high: The findings of the [SAICM independent evaluation](#) established that “civil society has supported the most vulnerable members of society, collecting evidence of practices and processes that have led to damaging health and environmental impacts of chemicals, and introduced projects aimed at avoiding such impacts.”⁵

The inclusion of civil society as eligible to Special Program funding would adjust the Special Programme to the multi-stakeholder nature of the Strategic Approach.

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⁴ See [Strategic Approach to International Chemicals Management, SAICM texts](#), the Dubai Declaration on International Chemicals Management, para. 4.

⁵ Executive Summary - Independent Evaluation of the Strategic Approach to International Chemicals Management from 2006 – 2015, SAICM/IP.3/9, paragraph 71.