

**White Paper for a
Global Minimum Transparency
Standard (GMTS)
for hazardous chemicals
in products**



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White Paper for a Global Minimum Transparency Standard (GMTS) for hazardous chemicals in products

This white paper presents the case for a global standard requiring disclosure of hazardous chemicals used in a product in international trade. Intended as a thought-starter, it explains why a transparency standard is necessary to protect human and environmental health and how it would form an essential foundation for a safe circular economy and assist countries in adding information to their national health registries. The paper identifies some of the issues that might arise in designing and implementing a global transparency standard, and it makes suggestions for how to address those issues.

The UN Environment Assembly (UNEA) and the 5th International Conference on Chemicals Management (ICCM5) are two opportunities where the global community could start taking measures to set such a standard in place.

Initial Signatories of the White Paper

Armenian Women for Health and Healthy Environment (AWHHE)	PAN Aotearoa New Zealand
BUND - Friends of the Earth Germany	PAN UK
Canadian Environmental Law Association	RightOnCanada
Chemical Safety Agency, Ukraine	The Lung Association- New Brunswick
Eco-Accord, Russia	TOXISPHERA, Brazil
European Environmental Bureau	Women Engage for a Common Future (WECF)
Forum Environment and Development	Women's Healthy Environments Network
Greenwomen, Kazakhstan	
PAN Germany	

Background

Chemicals in Products (CiP) became an Emerging Policy Issue in the Strategic Approach to International Chemicals Management (SAICM), following a decision by the SAICM decision making body ICCM in 2012¹. It promotes information sharing on the identity of chemicals in products inside and outside supply chains. In 2015, a CiP Programme was created to boost the CiP work, among other things, by better defining the conditions and formats for information sharing². However, the expected boost in work predominantly did not occur. The CiP work needs to be revived with new and strong commitments in the successor to SAICM. The adoption of the CiP Programme in 2015 coincided with the publication of the first European Union (EU) action plan for a circular economy, which has been updated and revised³. The EU is in the process of adjusting all chemicals and waste legislation to support the circular economy.

Discussions are also picking up worldwide, indicating circular economy as a key strategy to advance the work with a number of the Sustainable Development Goal (SDG) targets. This is attested by the resolutions that call for circular economy and to keep hazardous substances out of the material cycles, adopted by UNEA⁴.

Circular economy illustrates how the life cycle of chemicals and wastes crosscuts many environmental, health, and societal priorities and thematic areas, including the work of several global policy clusters, like biodiversity and climate change. It holds the potential for the narrative that will pro-

mote the understanding of why synergies between several policy clusters must be enhanced in the post 2020 framework and why the political priority for chemicals and waste is necessary to increase. In its recently released Chemicals Strategy for Sustainability, the EU Commission points to the need for mainstreaming the transition to a toxic-free and circular economy as “essential cross-cutting elements for sustainable development and taking into account policy coherence for development”⁵. Knowing what chemicals are in products throughout product life cycle is crucial for a safe, non-toxic circular economy. This underlines the importance of fulfilling the CiP Programme information objectives that call for disclosing chemicals in products within and outside the product supply chain.

Noting that consumer products are recognized as a source of toxic chemicals exposure, disclosing information on their presence in products will also enable countries to assess direct exposure from the products, as well as leakage of these chemicals from the products to the environment and secondary exposure from air, water, and food, and then link this data with public health impacts through national health registries. This would support national information collection and handling systems for environmental toxicants risk assessments and assist in identifying toxicants that need to be reassessed, depending on the degree of risk.

Thus, while the work with voluntary disclosure of chemicals in products should continue and intensify, obligations for the work on chemicals in products

as SAICM issue of concern should also increase. This, among other things, was highlighted by the recent United Nations Environment Programme (UNEP) assessment report on SAICM Issues of Concern (IoCs)⁶; this report responds to Resolution 4/8 by the UNEA and aims to inform the international community about the current situation of specific IoCs, based on a review of evidence published within the past decade. The assessment identified an urgent need to step up the work with the existing IoCs, including through binding instruments. It pointed out that progress in the IoC work has been uneven between countries and that policy inconsistencies across countries hamper progress. It also stressed that with the increasing interest globally to put circular economies in place, information about chemical contents must be available at all stages of a product's life cycle. It, furthermore, called for holistic approaches to address the IoCs. Where possible, it suggests that actions should build on existing regulatory initiatives.





Rationale

Consumer products are an essential source of toxic chemicals exposure throughout product lifecycle. Transparency and traceability that contribute to preventing the presence of chemicals of concern in products and the associated material flows are at the core of a circular economy that should be safe for human health and the environment. However, the lack of globally agreed requirements to ensure the availability and accessibility of information on hazardous chemicals in products⁷ throughout the product life cycle leads to continued contamination of the supply chain. Noting that supply chains for many materials and products nowadays are multi-national, the spread of chemicals of concern in them is hard to address until harmonized global actions are adopted. It is particularly difficult for low-income countries to get access to information. Many of them are net importers of products, and companies there lack the resources and sometimes knowledge to systematically request information from suppliers, particularly beyond their national jurisdictions. Global information requirements would eliminate this obstacle, improve progress in the CiP work between countries, and, consequently, address one of the concerns in the UNEP assessment of SAICM IoCs⁸.

Furthermore, suppliers in multi-national supply chains for products often have to deal with multiple parallel company or country/region-specific standards, which requires resources that are sometimes hard to leverage for small and medium-sized companies, particularly in low- and middle-

income countries. Globally harmonized standards level the playing field for all companies, facilitate information exchange within and outside the supply chain and throughout product lifecycle, and eliminate potential double standards while ensuring equality before the law in all countries and regions. Globally harmonized standards will be especially beneficial to the safety of workers, consumers, and the environment in countries where regulation is missing or weak.

The EU Chemicals Strategy for Sustainability highlights the need for helping countries to meet obligations in relation to international agreements on chemicals and waste, including through putting in place common standards that offer high protection to human health and the environment and level playing fields⁹.

The UNEP assessment on CiP work called for holistic approaches to address the IoCs. Depending upon the chosen chemical scope of the standard, a global minimum transparency standard (GMTS) for Chemicals of Concern holds the potential to be an example of a holistic tool for simultaneously improving access to information for several IoCs, and not just CiP, including hazardous substances within the life-cycle of electrical and electronic products (HSLEEPs), per- and perfluoroalkyl substances (PFASs), endocrine-disrupting chemicals (EDCs), as well as the suggested candidate IoCs in the UNEP report, such as arsenic, bisphenol A (BPA), cadmium, organotins, and phthalates. These arguments



are the rationale for establishing a global minimum transparency standard for Chemicals of Global Concern across sectors.

Models and scope of products and chemicals

Data on exposures and risks associated with chemicals are very scarce and incomplete in the real world. Therefore, the most practical way to identify chemicals for the list is based on their intrinsic hazard properties, which also aligns with the precautionary principle¹⁰. For example, Chemicals of Global Concern are identified for the Stockholm Convention based on their intrinsic hazard characteristics¹¹. Substances of Very High Concern (SVHC) for the Candidate List of the EU chemicals legislation, the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation, are also identified using hazard-based criteria¹². Furthermore, the definition of the scope of chemicals for the SAICM CiP Programme refers to hazard properties¹³.

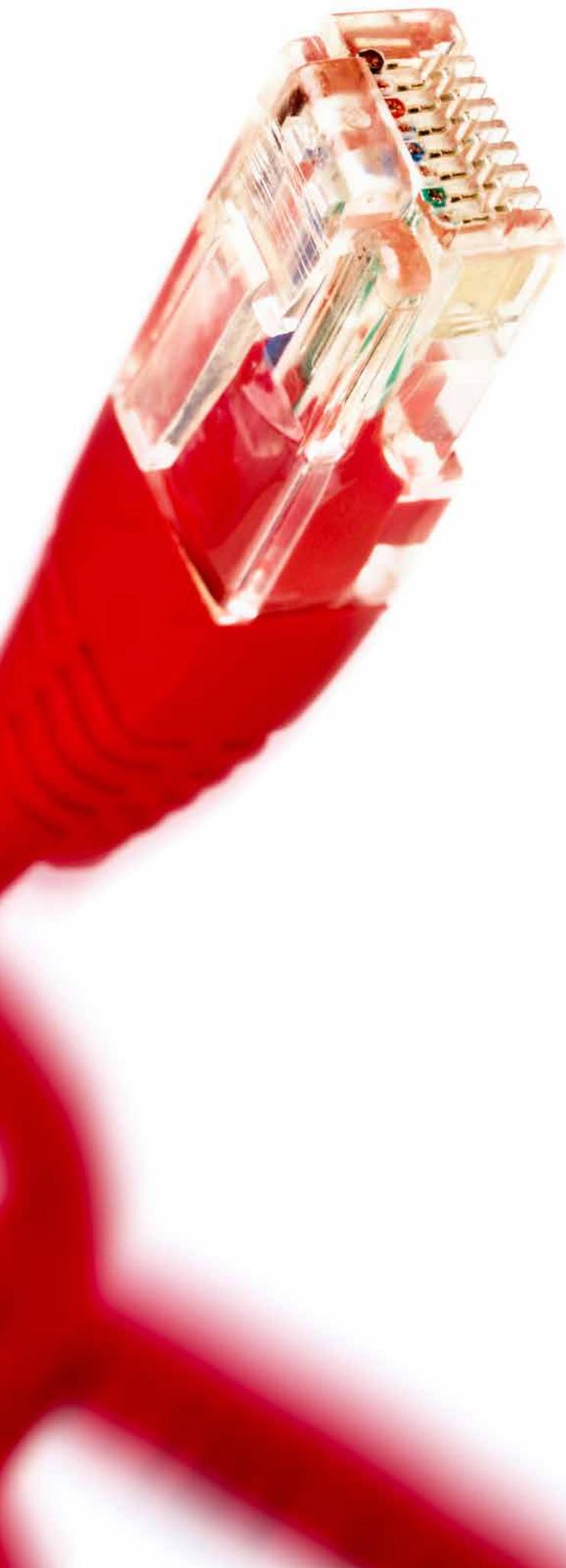
We suggest that the global minimum transparency standard is a negative list, i.e., that it contains chemicals that are recognized as having intrinsically unacceptable hazardous qualities to human health and the environment. Regulatory lists are usually negative lists, such as the Stockholm Convention list and the EU Candidate List. From the point of view of confidential business information, a negative list is also less complicated than a positive. It should be non-controversial for a company to disc-

lose information on hazardous chemicals, also to stakeholders outside the supply chain, in line with the CiP Programme¹⁴. That the information provided by the global minimum transparency standard is available to all stakeholders along the life cycle of a product is critical.

There are several possibilities for constructing the global minimum transparency standard. It should apply to the scope of products, and their constituent components, defined in the CiP Programme¹⁵.

To ensure that a global minimum transparency standard for Chemicals of Global Concern is quickly agreed upon, we suggest including the chemicals regulated in the Basel¹⁶, Minamata¹⁷, and Stockholm Conventions¹⁸, the Montreal Protocol of the Vienna Convention¹⁹, the IARC list of carcinogens²⁰, as well as the chemicals in the EU Restriction of Hazardous Substances (RoHS) Directive²¹ and Substances of Very High Concern (SVHC) as defined in article 59 of the EU REACH regulation²². This is in line with the recommendation in the UNEP assessment of the IoC work to build actions based on existing regulation.

The rationale for including chemicals listed in the Basel and Stockholm Conventions is that they are relevant for waste destined for recycled materials, such as plastics, e-waste, and textile waste. Recycling waste containing toxic chemicals could result in the contamination of new products made of recycled materials²³. In January 2020, the EU with-



drew its specific exemption under the Stockholm Convention that allowed materials containing toxic flame retardants known as PBDEs to be recycled²⁴. That was an important step forward towards cleaning up the recycling and minimizing the contamination of new products.

Furthermore, there is no obligation for disclosure under these conventions. However, implementation of the conventions could be facilitated by disclosing information about the presence of the regulated chemicals in materials. Thus, it should be non-controversial to build the global minimum transparency standard based on the Conventions. The EU RoHS directive has been used as a model for more or less identical regulations in several countries²⁵. Consequently, it should be non-controversial to use it as a global minimum transparency standard component.

The SVHC list is arguably the most comprehensive listing of Chemicals of Global Concern available now. The SVHC, on the other hand, are specific to the EU. However, the criteria underlying their identification capture the hazard properties in the definition of the scope of chemicals for the SAICM CiP Programme. The SVHC chemicals are already associated with a mandatory disclosure requirement. A public database for SVHC in all products produced in or imported to the EU has already been launched²⁶. This database builds on the principle of fulfilling all CiP Programme information objectives and could become a role model for a similar database at the global level.

If chemicals overlap in the mentioned regulations, the strictest regulatory limits should apply to the global minimum transparency standard for information disclosure.

The global minimum transparency standard should reflect the updates if any underlying conventions and regulations are updated.

The concentration thresholds for reporting to the transparency standard need to be carefully considered²⁷. They must also be low enough to provide sufficient protection to human health and the environment. For example, the threshold for SVHC disclosure in the EU REACH regulation is 0.1%, which may be insufficient for EDCs that may be biologically active at very low concentrations. In the EU RoHS Directive, the threshold for disclosure is 0.01%, which is more appropriate and gives a better safety level. If an industry already has a stricter reporting requirement, it is encouraged to proceed with its already established stricter standard, thus supporting a higher level of ambition for reporting.

While the approach outlined above is reasonable and important, to begin with, the current chemical conventions are insufficient for capturing the transboundary distribution of Chemicals of Global Concern via anthropogenic modes, such as international supply chains for products and waste. They do not capture either trans-generational effects²⁸ or cocktail effects²⁹. There are undoubtedly hazardous chemicals that fulfill several of the Stockholm Convention criteria but fail the criterion on long-range geographical transport because the Stockholm Convention criteria only consider transport in air, water, and biota, not material flows. Thus, we also see the need to develop complementary criteria for Chemicals of Global Concern to address the existing gaps. The Swedish Chemicals Agency (KemI), the Center for Future Chemical Risk Ana-

lysis and Management Strategies of Gothenburg University, and the United Nations Institute for Training and Research (UNITAR) have recently developed a proposal for hazard-based criteria to identify Chemicals of Global Concern and presented it in connection with a technical expert workshop in support of the Intersessional Process³⁰. This proposal could potentially serve as the starting point for developing complementary criteria for Chemicals of Global Concern.

Not to forget, companies could and should be encouraged to have more ambitious transparency schemes in addition to the global minimum transparency standard.

Development and management

There are different approaches to how the criteria and global minimum transparency standard for Chemicals of Global Concern could be developed and managed.

A multi-stakeholder committee free from the influence of commercial interests and coordinated by the Inter-Organization Programme for the Sound Management of Chemicals (IOMC) could be tasked with developing the global minimum transparency standard and complementary criteria for Chemicals of Global Concern, following a decision at the upcoming ICCM5.

Once the criteria and the list are established, the list can be managed and kept a living list by a multi-stakeholder committee coordinated by IOMC, possibly with additional regular input from SAICM stakeholders. Any stakeholder in the multi-stakeholder committee should be allowed to nominate chemicals to the list, together with a written motivation with reference to the criteria.



Ideally, the global minimum transparency standard should be part of a binding agreement. It could become part of an existing treaty, where a treaty allows for amendments or additions of protocols. This option should be investigated for the already mentioned chemical conventions or the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, an instrument developed through the UN Economic Commission for Europe, that serves as an “open” global treaty³¹.

Another approach would be a standard like the Globally Harmonized System (GHS)³². Implementation of the GHS has three stages: formal adoption by countries; incorporation into national legislation, i.e., to make it binding; and facilitation and enforcement of the uptake and use of GHS by companies and any other relevant actors. A disadvantage of this approach is that different countries may adopt different versions of the standard, just like we see for GHS, which is an obstacle to reaping the benefits from full harmonization.

In any kind of committee, it is very important to ensure strong participation from low- and middle-income countries so that their perspectives and needs are duly considered. Many low- and middle-income countries are net importers of materials

and products and generally have poor analytical capacity and test resources. Consequently, they are dependent upon getting information about hazardous chemicals in them from their upstream suppliers. In the GHS sub-committee, hosted by the United Nations Economic Commission for Europe (UNECE), representatives from member states of the Organisation for Economic Co-operation and Development (OECD) have a disproportionately strong influence. Establishing a committee to manage a global minimum transparency standard should help avoid this situation.

We envision two steps: first, there is a mandatory disclosure requirement for the chemicals in the transparency list, then restrictions at the global level of the substances in the list that are not yet regulated by conventions.

Compliance to the standard will have to be ensured by appropriate national systems, for example, regular spot checks with analytical verification of Chemicals of Global Concern in the materials/products. Custom service can be responsible on borders and national Chemicals Agencies or police in other cases.



Use of a global minimum transparency standard for Chemicals of Global Concern in the successor to SAICM

We urgently need to elevate commitment to and the ambition level in the CiP work and the successor to SAICM.

A concrete way to strengthen mechanisms for taking stock of progress is to include a global minimum transparency standard for Chemicals of Global Concern as a milestone in the framework of targets, indicators, and milestones for a CiP workplan.

An example of what this could look like in practice is in Annex A. Besides establishing the global minimum transparency standard into the successor to SAICM, it also outlines a logical sequence of actions that build on the global minimum transparency standard starting with the existing chemical agreements and, over time, would step up the ambition level in the CiP work considerably. The initial step will be to develop the global minimum transparency standard for regulated chemicals and ensure they are disclosed in products.

Further on, the list of chemicals could be expanded based on the developments within the agreements and complementary information addressing the gaps. A global publicly accessible database will further be developed to ensure obligatory information disclosure within and outside the supply chain on chemicals of global concern in products,

following the ECHA database example. Eventually, the disclosed chemicals of global concern could be regulated as suggested in Target Y, Milestone 1, Annex A.

In connection with the discussion of the Virtual Working Group 1 on Targets, Indicators, and Milestones (VWG1) set up to prepare recommendations regarding the Strategic Approach and the sound management of chemicals and waste beyond 2020³³, the targets and milestones from Annex A were rearranged to become more concrete. The report prepared by the Co-facilitators of the VWG1 includes new transparency targets, based on the targets and milestones from Annex A below. These new targets are also included in Annex B to the White Paper.

While adopting the global minimum transparency standard for Chemicals of Global Concern is a keystone for a global toxic-free circular economy, the CiP work should continue for full ingredient disclosure. Chemicals that are considered harmless at present may be regarded as harmful in the future. The best way we can track in which products the chemicals are, should the hazard classification change, is full ingredient disclosure.

Suggested ways forward

ICCM can adopt decisions on developing complementary criteria for Chemicals of Global Concern, and a global minimum transparency standard based on the criteria, as long as they are purely voluntary. This could be done within the framework of the successor to SAICM. It should also be able to issue resolutions calling for other fora to develop the criteria and standard and investigate if it could be connected to increased obligations.

Ideally, the criteria and standard should be developed under IOMC, to ensure solid commitment and ownership by all inter-governmental organizations of relevance to the sound management of chemicals and waste. Then a resolution of higher political weight than an ICCM resolution would be preferable.

Resolutions by UNEA, or even the United Nations General Assembly (UNGA), would have that political weight. A decision by the UNGA to establish an Enabling Framework³⁴, as envisioned by several SAICM stakeholders, would be most helpful to revive and improve the function of IOMC, so that it, among other things, could be tasked with creating the committee for criteria and standard development.

As mentioned in the background section, several resolutions adopted by the UNEA4 called for circular economy and improved transparency and information sharing on chemicals in the supply chain of products, particularly resolution UNEP/EA.4/Res.8³⁵.

We strongly encourage countries and regions to consider suggesting new chemicals and waste resolution for the UNEA5, building upon UNEP/EA.4/Res.8, but taking it a step ahead by calling for a committee to develop complementary criteria for Chemicals of Global Concern, a global minimum transparency standard, and investigate if the standard could eventually be added as a protocol to an existing treaty. This would be a logical and concrete step ahead that would lay the foundation for a global circular economy safe to human health and the environment. Such a resolution prior to ICCM5, would also give a clear mandate for including criteria for Chemicals of Global Concern, and a global minimum transparency standard, into the targets, indicators, and milestones for the CiP workplan in the successor to SAICM.



Annex A

Example of how a global minimum transparency standard can be operationalized in SAICM³⁷

Target	Indicator	Milestone
Target X: Information on the properties of chemicals across the supply chain and their sound management including alternatives, and chemical contents of products is available to all to enable informed decisions and actions.	Indicator 1: A committee ³⁶ for the development of criteria to disclose and identify Chemicals of Global Concern based on intrinsic hazard properties in place and operational.	Milestone 1 for Indicator 1, 2: By year A, a global transparency standard for Chemicals of Global Concern is in place, ready to be adopted into national action plans for the successor to SAICM.
	Indicator 2: Chemicals of Global Concern based on the developed criteria identified for the global transparency standard.	
	Indicator 3: Dedicated funding in place for the creation of a global database for Chemicals of Global Concern.	Milestone 2 for Indicator 3 and 4: By year B, a publicly available global database administered by UNEP for Chemicals of Global Concern is in place to support informed decision-making, and it will expand over time as needed, when increasingly more countries report to it, and if new chemicals are added to the transparency standard or more product categories become prioritized.
	Indicator 4: A consultant for the creation of the global database for Chemicals of Global Concern procured and operational with no conflict of interest.	
	Indicator 5: Number of countries that have adopted the global transparency standard for Chemicals of Global Concern into national action plans and report to ICCM to feed in data to the global database.	Milestone 3 for Indicator 5: By year C, 25% of the UN countries report to ICCM on chemicals in products according to the global transparency standard for Chemicals of Global Concern, and the data is added to the database; by year D 50%; by year E 75%; and by year F 100%.
Target Y: Chemicals or groups of Chemicals of Global Concern, have been identified and phased out or are effectively restricted at the national level, throughout the entire life cycle, including the waste stages, so that exposure of humans and the environment is prevented or restricted.	Indicator 1: X Chemicals of Global Concern from the global transparency standard can no longer be legally marketed in Y countries.	Milestone 1 for Indicator 1 and 2: By year A, 25% of the UN countries have legislation and enforcement mechanisms in place and operation that ban, include a phase out plan with sunset dates, or restrict at least B Chemicals of Global Concern from the global transparency standard; by year C 50%; by year D 75%; and by year E 100%.
	Indicator 2: X Chemicals of Global Concern from the global transparency standard are restricted in Y countries.	
Target Z: All non-essential* uses of chemicals or groups of chemicals of concern have been identified, phased out or effectively restricted.	Indicator 1: A committee in place to map non-essential uses*, in line with the Montreal Protocol definition, for the Chemicals of Global Concern in the global transparency standard.	Milestone 1 for Indicator 1, 2 and 3: By year A, 25% of the UN countries have legislation and enforcement mechanisms in place and operation that ban, include a phase out plan with sunset dates, or restrict at least B Chemicals of Global Concern from the global transparency standard with reference to the Montreal principle of non-essential use*; by year C 50%; by year D 75%; and by year E 100%.
	Indicator 2: Non-essential essential uses*, in line with the Montreal Protocol definition, mapped for the Chemicals of Global concern in the global transparency standard.	
	Indicator 3: Procurement policies of national and local governments, manufacturers and retailers do not permit purchasing of products where Chemicals of Global Concern from the global transparency list have been used in ways considered non-essential in line with the Montreal Protocol definition.	
		*Non-essential uses: See concept of "essential use" in Decision IV/25 for the Montreal Protocol. The two elements of an essential use are that a use is "necessary for health or safety or for the functioning of society" and that "there are no available technically and economically feasible alternatives". All other uses are considered to be non-essential.

Annex B

New targets that are focused on disclosure of information on hazardous chemicals in products and were proposed during VWG1 on Targets, Indicators and Milestones

New Target A6: By 2030, all chemicals, or groups of chemicals, of global concern, are phased out or effectively restricted at the national, regional and global level, throughout the entire life cycle, including in products and waste, so that exposure of humans and the environment is prevented or restricted.

New Target B3: By 2026, a global minimum cross-sectoral transparency standard for chemicals of global concern is in place and used to support the work on Chemicals in Products internationally and in national implementation plans, as well as the transition to non-toxic materials flows, e.g. via circular economy.

New Target B4: By 2030, a publicly available global database administrated by UNEP for chemicals of global concern is in place to support informed decision-making, and it will expand over time as needed, when increasingly more countries report to it.

NEW Target B.5: By 20XX, stakeholders in the value chain ensure that reliable information on chemicals in [materials and] articles is available throughout their life cycle [including at the waste stage], to enable informed decisions and safe management of chemicals in a clean circular economy;

Endnotes

- 1 Emerging policy issues; (<http://www.saicm.org/Portals/12/documents/meetings/ICCM2/doc/ICCM2%20%20emerging%20issues%20E.pdf>)
- 2 Chemicals in Products Programme (<http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1502319%20SAICM-ICCM4-10-e.pdf>)
- 3 EU revised action plan for circular economy (https://ec.europa.eu/environment/circular-economy/pdf/new_circular_economy_action_plan.pdf).
- 4 UNEP/EA.4/Res.6 (<http://wedocs.unep.org/bitstream/handle/20.500.11822/28471/English.pdf?sequence=3&isAllowed=y>), UNEP/EA.4/Res.7 (<http://wedocs.unep.org/bitstream/handle/20.500.11822/28472/English.pdf?sequence=3&isAllowed=y>), UNEP/EA.4/Res.8 (<http://wedocs.unep.org/bitstream/handle/20.500.11822/28518/English.pdf?sequence=3&isAllowed=y>), and UNEP/EA.4/Res.19 (<http://wedocs.unep.org/bitstream/handle/20.500.11822/28501/English.pdf?sequence=3&isAllowed=y>)
- 5 Chemicals Strategy for Sustainability – towards a toxic-free environment (<https://ec.europa.eu/environment/pdf/chemicals/2020/10/Strategy.pdf>)
- 6 Issues of Concern is the proposed collective term for what was earlier called Emerging Policy Issues and Other Issues of Concern.
- 7 From now on, “product” is considered a collective name for materials/products that are constituent components of more complex products, as well as complex products.
- 8 The UNEP Assessment of SAICM IoCs highlights the following challenges and opportunities for the work on chemicals in products” (1) Foster communication of chemicals present in products throughout the supply chain, versus the current common practice of communicating what should not be present. (2) Extend CIP communication to actors outside supply chains, e.g., by exploring instruments such as fiscal policies, extended producer responsibility, corporate sustainability reporting, and new public-private partnerships. (3) Ensure CIP information is relevant, accurate, current and accessible through strong regulatory and voluntary actions on effective monitoring and enforcement.
- 9 Chemicals Strategy for Sustainability – Towards a Toxic-free Environment (<https://ec.europa.eu/environment/pdf/chemicals/2020/10/Strategy.pdf>)
- 10 The precautionary principle first emerged during the 1970s and has since been enshrined in a number of international treaties on the environment, such as Principle 15 of the Rio Declaration, in the Treaty on the Functioning of the EU and the national legislation of a number of Member States. It enables decision-makers to adopt precautionary measures when scientific evidence about an environmental or human health hazard is uncertain and the stakes are high.
- 11 Annex D, Stockholm Convention (<http://www.pops.int/Portals/0/download.aspx?d=UNEP-POPS-COP-CONVTEXT-2017.English.pdf>).
- 12 Article 57, REACH Regulation (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1907&from=EN>).
- 13 Chemicals in Products Programme (http://www.saicm.org/Portals/12/Documents/EPI/CIP%20programme%20October2015_Final.pdf).
- 14 SAICM CIP programme inter alia states that “Information on chemicals relating to the health and safety of humans and the environment should not be regarded as confidential”.
- 15 See page 9 of the CIP Programme document (<http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1502319%20SAICM-ICCM4-10-e.pdf>).
- 16 Basel Convention (<http://www.basel.int/TheConvention/Overview/TextoftheConvention/tabid/1275/Default.aspx>). Annex I chemicals in plastic waste, e waste, textile waste, and other waste intended for recycling.
- 17 Minamata Convention (<http://www.mercuryconvention.org/Portals/11/documents/Booklets/COP3-version/Minamata-Convention-booklet-Sep2019-EN.pdf>)
- 18 Stockholm Convention (<http://www.pops.int/Portals/0/download.aspx?d=UNEP-POPS-COP-CONVTEXT-2017.English.pdf>), non-pesticide/biocide chemicals.
- 19 Montreal Protocol (https://ozone.unep.org/sites/default/files/2019-12/The%20Ozone%20Treaties%20EN%20-%20WEB_final.pdf)
- 20 Agents classified by the IARC Monographs, volumes 1-127 (<https://monographs.iarc.fr/list-of-classifications>).
- 21 EU RoHs Directive (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0065&from=EN>)
- 22 Substances of Very High Concern (<https://echa.europa.eu/candidate-list-table>,
- 23 Toxic Loophole – recycling hazardous waste into new products (https://ipen.org/sites/default/files/documents/TL_brochure_web_final.pdf).
- 24 Stockholm Convention Exemption (<http://chm.pops.int/Implementation/Exemptions/SpecificExemptions/TetraBDEandPentaBDERoSE/tabid/5039/Default.aspx>).
- 25 RoHs as a model for similar regulations in many countries (<https://www.rohsguide.com/rohs-future.htm>).
- 26 EU SCIP database (<https://echa.europa.eu/sv/scip-database>).
- 27 Guidance for stakeholders on exchanging chemicals in products information (<http://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1502355%20SAICM-ICCM4-11-e.pdf>).
- 28 Trans-generational effects: Effects of chemical exposure manifesting in offsprings to individuals who were exposed, sometimes several generations back, and long after exposure has terminated. This can happen because chemicals may interfere with how genes are regulated, by changing the regulation in hereditary ways.
- 29 Cocktail effects: Toxicity combination effects between mixtures of chemicals. They may jointly increase toxicity to larger degrees than the individual toxicities of the chemicals in the mixture, or cancel out any added toxicity effects.
- 30 Documents from the technical expert workshop, including the suggested criteria (<https://unitar.org/technical-expert-workshop-criteria-substances-international-concern-beyond-2020>).
- 31 Aarhus Convention (<https://www.unece.org/env/pp/introduction.html>).
- 32 A Guide to The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) (<https://www.osha.gov/dsg/hazcom/ghsguideoct05.pdf>).
- 33 <http://saicm.org/Beyond2020/IntersessionalProcess/VirtualWorkingGroups/tabid/8563/language/en-US/Default.aspx>
- 34 Enabling Framework (http://www.saicm.org/Portals/12/documents/meetings/IP3/INF/SAICM_IP3_INF4_EnhancingGovernanceSMCW.pdf)
- 35 UNEP/EA.4/Res.8 (<http://wedocs.unep.org/bitstream/handle/20.500.11822/28518/English.pdf?sequence=3&isAllowed=y>).
- 36 Suggestions in Annex A are rearranged in more concrete targets presented in Annex B. These targets are included into the co-facilitator report from the VWG1 on Targets, Indicators and Milestones
- 37 The Terms of Reference for the committee will be to define criteria for disclosing information on chemicals of concern in products, including complementary criteria for chemicals of global concern to address the gaps in existing chemical conventions and agreements.

