

## Strategic Approach to International Chemicals Advocacy (SAICM) Background

### What is SAICM?

***What prompted it?*** Global discussions to develop a strategic approach to international chemicals management were called for at the World Summit for Sustainable Development held in Johannesburg in 2002. The Plan of Implementation adopted at that meeting provided that the objective for SAICM, is to achieve the goal that “by 2020 chemicals are used and produced in ways that lead to the minimization of significant adverse effects on health and the environment.”

This strategic approach was not to be wholly new, but rather to be based upon previously negotiated plans for international chemicals management, in particular Agenda 21, The Earth Action Plan adopted at the Rio Summit in 1992, and the Bahia Declaration and Priorities for Action beyond 2000 adopted by the Intergovernmental Forum on Chemical Safety (IFCS). Further information on SAICM can be found at <http://www.chem.unep.ch/saicm/>.

***What has the process been?*** The first meeting of the Preparatory Committee (PrepCom1) to develop SAICM was held in Bangkok in November 2003, and the second was held in Nairobi in September 2004. A third and final PrepCom session will be held September 19-24, 2005 in Vienna. The outcome of this final session will be formally adopted at a high-level International Conference on Chemicals Management on February 4-6, 2006 in Dubai.

***What will SAICM look like?*** There will be three key outcomes from SAICM: 1) a ministerial declaration, 2) an overarching strategy document and 3) a list of concrete actions with time frames and responsible parties designated. The key elements of the strategy will be: 1) risk reduction; 2) knowledge and information; 3) governance; 4) capacity building and technical cooperation; and 5) illegal international trafficking. The outcome will not be a binding international instrument, but a robust implementation mechanism is expected to be created.

Because a plan and agenda for chemicals management already existed in Agenda 21 and the Bahia Declaration, SAICM discussions were expected to focus primarily on efforts to “bridge the gap” in managing chemicals safely that exists between developed and developing countries through global cooperation and support. Others had different aims, and used the forum to attempt to move the global chemical regulatory system toward more extreme hazard- and precaution-based approaches, like those being promoted in the European REACH legislation. As a result, the participants in SAICM have worked from a clean slate, creating a wholly new agenda for chemicals management.

***Who has been involved?*** The secretariat for the discussions is the United Nations Environment Program (UNEP). Over 110 governments have participated in the previous meetings. The meetings have also had, and will continue to have, broad participation from intergovernmental organizations (such as UNEP, IFCS, OECD, the World Bank, etc) and non-governmental organizations (NGOs), including representatives of environmental groups, unions and industry.

## Strategic Approach for International Chemicals Management What Is at Stake for Industry

Although the final product of these negotiations will not be a binding legal instrument, SAICM will provide the framework for future international and regional chemical management arrangements and will strongly influence the development of, or amendments to, national legal and regulatory systems for chemicals.

**Opportunities.** On its face, the goal of SAICM is a laudable one, and the discussions provide an opportunity to promote harmonization, to encourage greater data sharing among countries and to revitalize efforts to build the capacity of all countries to handle chemicals safely. It is also an opportunity to build consensus around a risk and science based approach to chemicals management that will stand as a robust alternative to the overly restrictive, hazard-based regulatory approaches like those contained in the European REACH proposal.

**Threats.** Understandably, there are a number of important items for the chemical industry being considered, many relating to data generation and sharing, cradle to grave responsibilities and the safe management of chemicals particularly in developing countries. Some more radical proposals, however, suggest that if it remains in its current form, this framework could have profound impacts on industry:

- The reach of SAICM is broad. It covers, at a minimum, all agricultural and industrial chemicals at all stages of their life-cycle, including in products.
- SAICM contains some rather harsh proposals that are not based on science and risk, such as requirements for banning, phasing out and substituting for chemicals based solely on their hazard characteristics.
- SAICM contains new aggressive directives on when the precautionary principle should be invoked, undermining the carefully balanced and rational features of the current internationally agreed understanding regarding the appropriateness of action where there are uncertainties about chemical effects.
- Extensive new information demands from industry are contemplated. For example, provisions call for providing the chemical content of mixtures and articles, information on intrinsic properties and information on alternatives -- to all participants in the value chain, including consumers.
- In addition to the cost industry would bear in implementing these many proposals, a number of participants want industry funding to implement SAICM and for the national chemical regulatory activities of governments under the "Polluter Pays" principle, possibly through a tax.

Because of the potential long-term impacts of the outcomes of SAICM it is important to get it right: base SAICM on science and risk and focus it on those activities truly necessary to meet the 2020 goal, such as on assisting developing countries and economies in transition to improve their capabilities to effectively manage chemicals. Most important, SAICM's results should be consistent with, and build on, Responsible Care® and other industry initiatives.