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Subject: Chemical management

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Dear Mr. Miller

Here is our comments on UNEP/GCSS.1X/6 document on Chemicals management:

After reviewing the UNEP/GCSS.1X/6 document about policy issues: Chemical management. & UNEP /GCSS.1X/9/Add2

We recommend the following:

- We fully support active & strong SAICM with the definite aim to achieve the WSSD 2020 goal with the high level adoption of SAICM as a political and ethical commitment to work towards this goal ensuring that SAICM embraces core principles and approaches (including the precautionary principle and Liability and compensation), promotes substitution and provide guidance on how these shall be applied to chemical management. Providing substantial assistance to developing countries & countries in economic transition is a must to ensure they can take part in the SAICM implementation.
- We fully support that that the Executive Director of UNEP should be requested to perform the overall responsibility of the secretariat functions to support the implementation of SAICM. However under his command he will establish a multi-sectoral aspect of an institutional arrangement representing IOMC , GEF,IFCS,UNDP and World Bank for the secretariat. There is no objection that WHO takes a leading role in this context. Not only so but the national governments should also establish a multi-sectoral body (representative from environment, health, agriculture, industry...) under the ministry of environment or whatever agency dealing with environment as a whole in these countries to deal with UNEP to implement SAICM at a national level. This is essential for success of SAICM as chemical management is a multi sectoral issue . The whole issue of sound management should be included in the sustainable development program at national level with a high priority for eradication of poverty & improvement in the human health.
- We found that all these points are taken strongly in the the Document UNEP/GCSS.1X/9/Add 2 which we support fully.

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