

**U.S. Comments on the Advance Version of the UNEP Executive Director’s Report
“Towards a Pollution Free Planet”
July 13, 2017**

The United States appreciates UNEP’s efforts to raise awareness among the public and policy makers through its “Towards a Pollution Free Planet” report. We also appreciate the cross-cutting view of the impacts of pollution, including the coverage of health, ecosystems, and ecosystem services used in the report.

As noted in earlier comments on an outline of this background report, we believe it should be factual, informative, and policy-neutral without proposing recommendations, goals, or guidelines; only Member States should propose and decide on such outcomes. The draft report inappropriately puts forward a very detailed policy framework, including actions on technology transfer, air pollution, elimination of single use plastics, incentivizing sustainable lifestyle choices, antimicrobial resistance, sustainable agriculture and many other issues which have not been proposed or decided by Member States.

We would also like to offer specific comments on the report, including some inaccuracies, and/or misleading and unsubstantiated information:

Marine and Coastal Pollution: The phrasing in the document needs to be made more factual. Furthermore, the report frames plastics pollution as a coastal and marine issue, when it really is an “all waters” issue—those coastal and marine plastics (and other types of waste, including litter and trash) originate upstream. Linking inland systems to coastal and marine ones is an important aspect of addressing aquatic pollution.

Chemicals: There are several unsubstantiated or contradictory claims about chemicals’ health effects, including linking pesticide exposure and algal blooms to cancer risk. The report should emphasize the health effects from chemicals that are well understood and de-emphasize those that are tenuous or speculative. Furthermore, the information on data gaps for chemicals in commerce ignores the scale of use of these chemicals and the level of risk of exposure. While we agree that there are significant data gaps, we believe that we know much more about the greatest risks to human health and the environment than implied in this section of the report. Finally, the description of the Strategic Approach to International Chemicals Management (SAICM) does not match the SAICM mandate.

Lead Paint: While we support the report’s attention to the lead paint problem, we are concerned about the section of the report that highlights voluntary labeling and certification efforts by industry. This focus is inconsistent with the goal of the Lead Paint Alliance and opposed by many partners as ineffective. We suggest deleting references to voluntary labeling and certification and instead highlighting the need for government action on lead paint laws.

Air Pollution: The report discusses US programs on air pollution without a citation; a reference should be provided to ensure accuracy. In addition, the text should be checked to

assure that the technical information aligns with widely accepted science; for example, cancer should be listed as a potential health impact of PM 2.5.

Other issues

More generally, the report seems to treat equivalently references that vary widely in quality. Those references that draw on a range of scientific literature and were published by reputable international bodies with rigorous review processes should be treated differently from individual studies or reports from entities with a particular agenda.

The report should address better aligning efforts of multiple UN organizations. The work of the World Meteorological Organization, the UN Industrial Development Organization and others could also play an important role in providing countries with needed information to move toward a pollution free planet. Advancing action through the UN Interagency Task Force on Prevention and Control of Non-Communicable Diseases (NCDs) could be one mechanism as NCDs are responsible for 70% of all deaths worldwide.

The document should present multiple examples of policy frameworks when possible. For example, citing the North American approach to chemicals management alongside discussions of EU legislation would improve the balance of the report. As another example, the land and soil section of the report references the circular economy, a framework primarily used by the EU, without mention of Sustainable Materials Management and Resource Efficiency, used by the United States, or the 3Rs, used by other countries. Instead of citing individual “principles” such as polluter pays or precaution, we recommend UNEP refer to “polluter pays approaches.” Further, we note that the Rio Principles are paraphrased in Annex 6 of the report. We recommend that this Annex be deleted or if it is retained that the Rio Principles be replicated exactly as they were originally negotiated.

The report should give additional emphasis to the benefits of engaging nongovernmental stakeholders to address pollution.

When describing international action to address pollution, the report should summarize the case for addressing specific types of pollution through international or regional environmental agreements. It is generally acknowledged that such binding agreements most appropriately address pollution that is transboundary in nature. Moreover, many of the Multilateral Environmental Agreements listed in Annex 3 are incorrectly or inaccurately characterized, often using selective quotes or language that does not even appear in the agreements to try to show the relationship to reducing pollution that distorts the activities undertaken under the agreement.

The United States is in the process of reviewing many of its environmental policies. While such review is underway, the United States reserves its position on these issues.