UN Environment and the Ministry of Environment of the Republic of Estonia,

RE: Letter from H.E. Mr Siim Valmar Kitson, President of the United Nations Environment Assembly and Minister of Environment of the Republic of Estonia on the draft outline of the Ministerial Outcome Document

Dear Colleagues,

Thank you for your letter dated 8th August 2018 and the draft outline of the Ministerial Outcome Document for the upcoming fourth session of the UN Environment Assembly.

Cruelty Free International is the leading organisation working to end animal testing worldwide. Our Leaping Bunny certification for personal care and household products is the gold standard in providing consumers with the confidence to shop cruelty free.

We recently became an accredited NGO with UN Environment following our engagement in the 2018 High Level Political Forum and for a number of years in CITES. We are also an active member of the Consumer Information programme within UNEP’s 10 Year Framework of Programmes on Sustainable Consumption and Production.

The theme of the forthcoming UN Environment Assembly apposite and could not come at a more important time. We very much welcome the focus on innovative solutions to environmental challenges and sustainable consumption and production. We acknowledge that these challenges require bold solutions from governments and businesses at all levels as well as from civil society and individuals. SDG 12 provides the opportunity for each and every one of us to take meaningful action towards achieving the goal.

We hope that the Ministerial Outcomes from the UN Environment Assembly can be informed by information from NGOs as well as the upcoming Sixth Global Environment Outlook report and the report of the International Resource Panel.

Cruelty Free International and The Body Shop recently compiled a report that outlines the non-animal methods that are now available to ensure the safety of cosmetics. We are now in a position where non-animal tests for most human safety endpoints are not only more ethical but also more reliable, faster and cheaper than the animal tests they replace. This is a positive example of how scientific innovation can help consumption and production patterns to be more sustainable and more responsible.

We would also hope to see mention in the Outcome Document of the crucial role of consumers in delivering SDG 12. Every day, millions of consumers make purchase decisions based on their individual preferences, attitudes and behaviours. Collectively,
these decisions shape global patterns of production and consumption that will determine whether we achieve SDG 12. When combined at scale, individual consumer purchase decisions can be a powerful way to drive change. For example, over eight million people worldwide have signed our joint petition with The Body Shop calling for UN leadership to end cosmetics animal testing worldwide. This overwhelming support from citizens in more than 60 countries highlights growing consumer demand for more sustainable consumption and production and the need for authorities to enable that.

We would like to see an extra point added to the document's third priority to recognise the role that businesses play in innovative solutions for sustainable consumption and production. Businesses need to respond to consumer demand for more sustainable approaches at all stages of the production and marketing process. This is not only morally and ethically the right thing to do, but also makes sense from a business perspective. In the field of animal testing for example, we know that in vitro tests for skin and eye irritation can be conducted within a single day, whilst the corresponding tests on rabbits take two to three weeks to complete; a Cell Transformation Assay using computer models can cost as little as $500 dollars, avoiding animal tests which can take two years to carry out and cost approximately $1,000,000.

We also welcome the document's comments on the importance of allocating adequate resources to research and development to drive innovation for the environment, including to developing countries. We would like to see developing countries leapfrog outdated and unnecessary animal tests and be enabled to develop and use validated non-animal methods, reducing the impact on our environment and promoting sustainable lifestyle choices.

My colleague, Jack McQuibban, will be attending the European Regional Consultation for Major Groups ahead of UNEA4 in Tallinn at the beginning of September. I hope that you might be able to find the time to meet with him and discuss our suggestions in greater detail at some point during the two-day meeting.

We very much look forward to continuing to work with you and wish you a successful Fourth Session of the United Nations Environment Assembly.

Yours faithfully,

Kerry Postlewhite