Thank you for the opportunity to comment on the ministerial declaration for UNEA4. Pure Earth (formerly Blacksmith Institute) and the Global Alliance on Health and Pollution (GAHP) has both general comments and suggested wording.

General comments:

1. The connection between SCP, pollution and health is not made, and therefore there is no continuity between UNEA3 and UNEA4. The links are strong and should be pointed out and well-made.

Pure Earth and the Global Alliance on Health and Pollution (GAHP) will be issuing a report on the transboundary impacts of pollution, which include a strong component on impacts of pollution from a industrialization, urbanization and unsustainable consumption and production, which is causing contamination of food, toys, cosmetics, and other products that are causing disease and death in ALL countries, not just low- and middle-income countries. A draft of this report is included here for your review and will be published 11 December 2018 - in plenty time for UNEA4.

The findings of this report should be included in the ministerial declaration.

2. We find it disappointing that the "first priority" relates to data rather than action. In fact, ACTION is not included at all, making the declaration weak.

The priority should be to ensure Sustainable and Green production, that does not pollution and cause illness and disability in consumers or the general public. The onus should not be on the consumers to be aware of polluting and contaminated products but rather on producers and governments responsible for regulating that production. Private sector can contribute greatly by implementing due diligence systems to ensure toxic-free green products and supply chains.

3. In priority 2, the word decouple is unclear. The aim should be to decouple growth from unsustainable resource use and pollution. Meaning, we don't have to pollute to grow our economies or provide jobs. Green growth means green jobs, green products, and pollution-free production.

We suggest to include some wording:

paragraph 1. As ministers of the environment of the world, we recognise that poverty eradication, eliminating unsustainable and promoting sustainable, responsible patterns of consumption and production as well as eradicating pollution at its source and protecting and managing the natural resource base

add paragraph: we acknowledge that toxic, disease-causing pollution caused by industrialization, urbanization and unsustainable consumption and production is transboundary and affects all people and

the planet. It is our joint responsibility as producers and consumers to prevent, control and mitigate this pollution at its sources and thereby protect human health and the environment.

paragraph 5 We highlight the importance of creating synergies between sustainable and efficient uses of resources, maintaining and restoring healthy ecosystems, and climate change adaptation and mitigation in protecting the environment and human health, and achieving the sustainable development goals.

paragraph 1.e.) To empower the disclosure of consumer information, starting with electrical and electronic, textile and plastic products by 2025, and we develop solutions for product transparency and ensuring toxic-free green supply chains, including labelling systems, pollution due diligence monitoring, and digital product resource passports, product environment footprint, and life-cycle models.

Main priority 2: Foster sustainable and efficient resource management to decarbonize, detoxify, decouple growth from unsustainable resource use and pollution, and enhance ecosystem resilience.

- a) We improve national resource management strategies with an integrated life-cycle perspective to achieve a toxic-free, resource-efficient and -sufficient economy,
- c) We implement sustainable land management measures, including afforestation, wetland restoration and mining area recultivation, to combat desertification, pollution, deforestation, soil degradation and biodiversity loss, to promote and protect human health for generations to come and to improve climate change mitigation

Best regards, Rachael

Rachael Kupka
Director, Strategy & Development
Pure Earth / Global Alliance on Health and Pollution (GAHP)
Direct tel. +1 212.870.3480
tel. +1 212.870.3490
fax. +1 212.870.3488
skype: rachaelvinyard
rachael@pureearth.org
www.pureearth.org
www.gahp.net