

UNEP's Call for Written Inputs on Issues of Concern: Priorities for further work and potential further international action

NOTE from PAN International: PAN INTERNATIONAL has contributed written submissions in the below document, for Glyphosate, Neonicotinoids, Endocrine Disrupting Chemicals (EDCs), and Highly Hazardous Pesticides (HHPs).

PAN has highlighted all our texts in yellow for ease of identification.

Introduction

UNEP is undertaking a consultation on priorities for further work and potential further international action on 19 Issues of concern. This call for written inputs is being conducted to gather relevant information from stakeholders and views about the next steps that should be taken on issues of concern.

The call for inputs will address 19 issues of concern and you may wish to only provide answers for issues of concern that are of relevance to your organization/ country. At the start of each section, you will be asked whether you would like to provide responses on each specific issue. If you choose "No" on the introduction page of each issue you will be taken on to the next issue of concern.

Please be aware that the submitted responses will be made available on the UNEP website indicating the stakeholder affiliation/ government. The names and contact details of the respondents will not be published on the UNEP website. Further information on UNEPs consultation process can be [found here](#).

After completing the form and clicking "*submit*", your responses will be saved. An email will be sent to the email address you register below with a summary of your responses and a link to edit your submitted form. **It is therefore possible to return and edit your responses before the deadline by clicking "*submit*" again at the end of the same form.**

We highly recommend coordinating responses within your stakeholder affiliation/ government. Please complete this form for collecting written inputs by **15/08/2023** COB Central European time (CET).

Please enter your email details below to be notified once your form is submitted and to receive the URL to revisit and edit your form.

Email: _____

Background

In 2020, UNEP developed an [Assessment Report on Issues of Concern](#), to inform the international community about the current situation of specific chemicals and waste issues. It was based on a review of published evidence. It was intended to support discussion at the fifth session of the UN Environment Assembly (UNEA 5) and other international forums working towards sound management of chemicals and waste. The Assessment Report assessed the ability of existing actions to address current environmental and human exposure to individual chemicals and groups of chemicals. It looked at 11 issues with emerging evidence of risks identified by the Global Chemicals

Outlook-II and the 6 Emerging Policy Issues (EPIs) and two other Issues of Concern identified under the Strategic Approach to International Chemicals Management (SAICM). The report concluded that concerted international action by all stakeholders at all levels is urgently required.

GCO-II issues	SAICM Issues
1) Arsenic	1) Chemicals in products (CiP)
2) Bisphenol A (BPA)	2) Endocrine-disrupting chemicals (EDCs)
3) Cadmium	3) Environmentally Persistent Pharmaceutical Pollutants (EPPPs)
4) Glyphosate	4) Hazardous substances within the life cycle of electrical and electronic products (HSLEEP)
5) Lead	5) Highly hazardous pesticides (HHPs)
6) Microplastics	6) Lead in paint
7) Neonicotinoids	7) Nanotechnology and manufactured nanomaterials
8) Organotins	8) Per- and polyfluoroalkyl substances (PFASs) and the transition to safer alternatives
9) Phthalates	
10) Polycyclic Aromatic Hydrocarbons (PAHs)	
11) Triclosan	

In March 2022, at UNEA 5.2, UNEP was requested through [resolution 5/7](#) to seek views from Member States and other stakeholders on priorities for further work, building on existing measures and initiatives, and on potential further international action on the issues discussed in the Assessment Report on Issues of Concern. The resolution also requests the preparation of a summary analysis, taking into account the views received.

Through this call for inputs, UNEP intends to respond to UNEA's request by gathering information from stakeholders about the priorities for future work and potential further international action. The findings from this call for written inputs will inform the writing of the Summary Analysis. The Summary Analysis is expected to build upon the [SAICM Survey](#) which considered the 8 EPIs and other issues of concern.

Available resources to support your responses:

All 19 issues of concern will be covered in this call for written inputs. A recording from an information webinar held on 27 April 2023, on the Assessment Report on Issues of Concern is [available here](#) for your reference. Further background information can be found below:

- Assessment report [here>>](#)
- Annexes [here>>](#)
- Factsheets on Issues of concern [here>>](#)
- Catalogue of International Actions on Chemicals and Waste [here>>](#)
- Survey from SAICM Sec on EPIs [here>>](#)

The form for submitting written inputs will remain open until **15/08/2023** COB Central European time (CET).

Thank you for your kind support with this consultation.

Personal Information:

Institution/Organization:

Pesticide Action Network International (PAN International)

Type of Institution: (*Government | Intergovernmental Organization | Civil Society Organization | Business/Private Sector | Academia | Other*)

Civil Society Organization

If relevant, please describe the membership coverage, geographical coverage and area of interest of your institution:

Pesticide Action Network International (PAN International) is a network of over 600 participating nongovernmental organizations, institutions and individuals in over 90 countries working to replace the use of hazardous pesticides with ecologically sound and socially just alternatives. PAN was founded in 1982 and has five independent, collaborating Regional Centers, covering Latin America, North America, Europe, Africa and Asia Pacific (for more information please visit <https://pan-international.org>).

Country:

Global Network

Questions

1. Arsenic:

Screening Question - Arsenic

Arsenic is a naturally occurring metalloid that is ubiquitous in the Earth's crust. It is present in various inorganic and organic forms. Arsenic and arsenic compounds are used intentionally in wood preservatives, pesticides, animal feed additives, pharmaceuticals, glass production, alloy manufacturing, electronics, and semiconductor manufacturing.

Please visit the two-page factsheet on [Arsenic](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Bisphenol A (BPA))*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*

- a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Arsenic

Arsenic is a naturally occurring metalloid that is ubiquitous in the Earth's crust. It is present in various inorganic and organic forms. Arsenic and arsenic compounds are used intentionally in wood preservatives, pesticides, animal feed additives, pharmaceuticals, glass production, alloy manufacturing, electronics, and semiconductor manufacturing.

Please visit the two-page factsheet on [Arsenic](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other _____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
 - Options / guidance for economic instruments
 - Voluntary measures and approaches: (such as Guidelines, principles and strategies)

- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Arsenic](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

2. Bisphenol A (BPA)

Screening Question - Bisphenol A (BPA)

Bisphenols are a group of dozens of organic compounds that have been used as building blocks in the production of polycarbonate plastics, epoxy resins and other products since the 1960s. The variety of products include water bottles, sports equipment, medical devices, household electronics, thermal paper receipts, and food and beverage cans.

Among the bisphenols, bisphenol A (BPA) has attracted the most attention. The consumption of BPA and related products is widespread and estimated to continue to grow in the foreseeable future, driven mainly by increasing demand for polycarbonates and other plastics.

Please visit the two-page factsheet on [Bisphenol-A](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Cadmium)*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Bisphenol A (BPA)

Bisphenols are a group of dozens of organic compounds that have been used as building blocks in the production of polycarbonate plastics, epoxy resins and other products since the 1960s. The variety of products include water bottles, sports equipment, medical devices, household electronics, thermal paper receipts, and food and beverage cans.

Among the bisphenols, bisphenol A (BPA) has attracted the most attention. The consumption of BPA and related products is widespread and estimated to continue to grow in the foreseeable future, driven mainly by increasing demand for polycarbonates and other plastics.

Please visit the two-page factsheet on [Bisphenol-A](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)

- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Bisphenol A](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*

Other: _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

3. Cadmium

Screening Question - Cadmium

Cadmium is a toxic metal that is naturally found in the Earth's crust, generally at low levels. Cadmium and cadmium compounds are mainly used in nickel-cadmium batteries, alloys, coatings and plating, pigments in plastics, glasses, ceramics and paints, solar cells, PVC stabilisers and others. It has been produced, used and released in large quantities, and thus intentional human uses have caused widespread, persistent contamination and exposure.

Please visit the two-page factsheet on [Cadmium](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Glyphosate)*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Cadmium

Cadmium is a toxic metal that is naturally found in the Earth's crust, generally at low levels. Cadmium and cadmium compounds are mainly used in nickel-cadmium batteries, alloys, coatings and plating, pigments in plastics, glasses, ceramics and paints, solar cells, PVC stabilisers and others. It has been produced, used and released in large quantities, and thus intentional human uses have caused widespread, persistent contamination and exposure.

Please visit the two-page factsheet on [Cadmium](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
 - Options / guidance for economic instruments

- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization
(Multiple answers based on list below)?

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? (Open space answer. Please share a weblink to the initiative(s) if available).

6. Which sectors/value chains need to be closely involved in developing solutions? (Multi-choice. Please visit the two-page factsheet on [Cadmium](#) for more information on the topic. If you select "Other", please elaborate your response).

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

4. Glyphosate

Screening Question - Glyphosate

Glyphosate is an organophosphorus herbicide for agricultural, forestry and residential weed control that kills or suppresses all plant types, with the exception of those genetically modified to be tolerant to it. Since its introduction in 1974, glyphosate has become the most widely used herbicide worldwide. The largest use of glyphosate has been in agriculture, however glyphosate use in urban settings can also be a significant source of contamination.

Please visit the two-page factsheet on [Glyphosate](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Lead)*
 - Yes
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Glyphosate

Glyphosate is an organophosphorus herbicide for agricultural, forestry and residential weed control that kills or suppresses all plant types, with the exception of those genetically modified to be tolerant to it. Since its introduction in 1974, glyphosate has become the most widely used herbicide worldwide. The largest use of glyphosate has been in agriculture, however glyphosate use in urban settings can also be a significant source of contamination.

Please visit the two-page factsheet on [Glyphosate](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

As the most widely used herbicide active ingredient in the world – 8.6 billion kilograms of glyphosate has been sprayed on fields, equivalent to nearly half a pound for every cultivated acre on earth[i] (equivalent to 560 grams per hectare) - Glyphosate presents wholly unacceptable impacts and risk of impacts to both human health and the environment globally, and requires concerted international action.

Human Health Risks:

A Probable Carcinogen:

Based on multiple carcinogenicity studies in rats and mice supported by mechanistic evidence and the results of epidemiological studies, in 2015, the World Health Organization's International Agency for Research on Cancer (IARC) [classified glyphosate](#) as "[probably carcinogenic to humans](#)" and found a particular association between glyphosate and non-Hodgkin lymphoma.

A 2019 meta-analysis by University of Washington scientists found a [41% increased risk of non-Hodgkin's lymphoma](#) after exposure to glyphosate.

Nonetheless, most pesticide registration authorities, including in the US and EU, have approved use of the product.

In [a 2019 study](#) into how the IACR and US EPA came to diametrically opposed results on the carcinogenicity of glyphosate (IACR finding it to be a 'probable carcinogen' while the EPA found it not to be) academics found the EPA assessment 'relied mostly on registrant-commissioned, unpublished regulatory studies, 99% of which were negative, while IARC relied mostly on peer-reviewed studies of which 70% were positive (83 of 118)'. IARC also concluded that there was "strong" evidence for genotoxicity, both for "pure" glyphosate and for glyphosate formulations.

The analysis also found that the EPA focussed largely on technical glyphosate while the IARC placed heavy weight on results relating to formulations containing glyphosate, and that the EPA focussed more on dietary exposures, and did not take into account higher occupational exposures and risks that were considered by IARC.

In 2022, a US Federal Appeals court ruled that the US Environmental Protection Agency (EPA) must reexamine its 2020 finding that glyphosate did not pose a health risk, and in September 2022 the EPA withdrew its interim decision.

By May 2022, Monsanto, the manufacturer of the glyphosate herbicide 'Roundup' had paid out over [\\$11 billion in over 100,000 health related lawsuits on glyphosate](#) in the US. A further 30,000 US lawsuits are still to be heard.

Similarly, the divergence between the assessment of IARC (see above) and the European Food Safety Authority (EFSA - same conclusion as EPA) was subject to a critical assessments (doi: 10.1136/jech-2015-207005; doi: 10.1007/s00204-017-2009-7). In addition, it was shown that EFSA violated its own rules to reach its conclusion (doi:10.1136/jech-2017-209776)

Other health risks: Glyphosate has also been linked to other serious health effects in humans.

Multiple studies point to glyphosate as an endocrine disrupting chemical (EDC), with one comprehensive review concluding the substance meets 8 of the 10 key characteristics of EDCs. Studies have pointed to multiple linked effects, including disruption of reproductive organs in men and women, shortened pregnancy terms, lower birth weights.

Glyphosate has also been linked to liver and kidney disease, gut microbiome disruption, and anaemia.

All of these health risks and reported impacts are significantly heightened by the sheer ubiquity of glyphosate in the environment and our food, and the ease with which it is sequestered by humans. [A study by the U.S. Centers for Disease Control and Prevention](#) found glyphosate in the urine samples of 80% of US children and adults tested.

Environmental Risks:

Glyphosate presents significant environmental risks. Due to its extensive use, glyphosate is a ubiquitous contaminant in various environmental elements globally (especially in aquatic ecosystems).

Glyphosate, its formulations, and also the formulating agents can induce a broad range of both direct and indirect impacts on ecosystems and the environment, including ecotoxicological effects on terrestrial and aquatic organisms, including lethal/sub-lethal effects, morphological and biochemical changes.

As it kills most plants it contacts (other than plants genetically engineered to tolerate it) glyphosate use substantially reduces plant diversity in agricultural landscapes, directly impacting multiple species dependent on those plants, including birds, fish, frogs, snails, insects, and soil microbes.

Direct effects such as the unprecedented elimination of weeds and wildflowers from crop fields directly reduces plant diversity and biomass. This has knock-on effects on farmland biodiversity and ecosystem functions, such as pest control by natural predators, pollination services and functional soil structure. Ecosystem services are increasingly jeopardised by the elimination of not only weeds but all wild plants from agricultural fields and adjacent land, in addition to direct toxic effects on many organisms.

Glyphosate is water soluble and has had significant effects on species that underpin the entire aquatic food chain, with amphibians being particularly vulnerable.

It also upsets the balance of microbial communities in soil, disturbing beneficial soil bacteria and reducing their capability to suppress pathogens, impacting on soil fertility.

Combined, the human and environmental impacts of glyphosate need concerted action from the international community.

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Legally binding*
- Soft law*
- Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- Other _____.*

a. Please explain your response, including examples if possible*. _____

Legally Binding Measures

Only legally binding actions taken internationally will sufficiently regulate the production, trade and use of glyphosate in order to adequately mitigate the risks it presents.

While soft law, voluntary initiatives and information sharing and awareness can play a part in reducing the use of glyphosate, there is a plethora of data indicating that such voluntary or non-mandatory initiatives to remove harmful substances or practices from value chains are insufficient to normalise reforms.

Companies, farmers, and consumers largely operate within the parameters established by governments and enforced under the rule of law.

Where its use remains legally permitted, it is unrealistic to expect companies, farmers and consumers to dramatically reduce or to avoid the use of glyphosate – regardless of how much they know about its negative impacts. Regulatory action will also be essential to ensure market participants enjoy a level playing field within and across markets, and can act as a spur to innovation encouraging actors to develop less harmful alternatives and or to implement already existing non-chemical alternatives.

Soft Law Measures:

In addition to regulatory reforms on glyphosate, PAN believes that soft law measures can and should play a role in addressing the health and environmental impacts of glyphosate use worldwide, particularly as legally binding legal reforms may take some time to institute.

PAN believes corporate actors could and would act far more responsibly on glyphosate if the international soft law standards many companies have committed to comply with were strengthened and more targeted to address the impacts of pesticides.

There is significant scope to incorporate more explicit requirements on pesticides, including glyphosate, into the main UN and OECD soft law guidance on corporate due diligence on human rights and the environment.

Due diligence standards of relevance include but are not limited to the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Guidelines for Multinational Enterprises, the OECD-FAO Guidance on Responsible Agricultural Supply Chains, and the OECD Guidance on Pesticide Compliance and Enforcement Best Practices. None of these currently sufficiently guide companies on how to ensure their use of pesticides like glyphosate does not have a negative human or environmental impact.

The Joint Meeting on Pesticides Management (JMPM) also has a role to play in increasing international action on glyphosate, regardless of where else it might occur. While it cannot set the binding law required, it can of course ensure that any future pesticide management guidance it issues (which might itself be referred to in binding agreements) explicitly advises how glyphosate should be regulated and its use reduced in order to meet UN obligations on biodiversity and human rights. UNEP needs to use its new role as a fully-fledged participant in JMPM to ensure the institution and its products cohere with, complement, and contribute to the delivery of KMGBF Target 7, and that commensurate reductions in glyphosate use is part of the JMPM's mission.

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)).*

- Regulatory control measures**
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: Legally binding international treaty**

a. Please explain your response, including examples if possible: _____

Regulatory Control Measures:

In 2019, the [International Federation of Gynecology and Obstetrics \(FIGO\)](#) recommended that “glyphosate exposure to populations should end with a full global phase out.”

PAN agrees, and believes that national Regulatory Control measures will need to be the basic conduit of control over glyphosate.

PAN has for some years advocated for:

- The immediate withdrawal of glyphosate from sale to the public
- An immediate end to the use of glyphosate in public spaces in towns and cities
- An immediate end to the use of glyphosate for pre-harvest desiccation
- The rapid phase-out of glyphosate in agriculture and support to help farmers adopt safer approaches to managing weeds.

These will need to be legally binding reforms implemented and enforced by nation states, and reinforced by prohibitions on exports of glyphosate.

Such control measures should include, but not be limited to, de-registrations and de-authorisation of glyphosate by national registration agencies, the adaptation and strengthening of Maximum Residual Levels (MRL) legislation to exclude glyphosate from export-oriented industrial agriculture, and the implementation of prohibitions on the export of pesticides for all uses that are banned domestically.

However, to ensure national regulatory control measures are sufficiently global, and sufficiently harmonised to avoid an uneven international commercial playing field, it may be desirable to invest in the establishment of a new legally binding international treaty on pesticides.

Existing international treaties relevant to certain pesticides – including the UN’s Stockholm Convention and Rotterdam Convention - do not address glyphosate.

While pesticides are a focus of the International Conference on Chemicals Management (ICCM) and the Strategic Approach to International Chemicals Management (SAICM), to date these international forums have, in part due to their voluntary nature, failed to take any widespread meaningful action on glyphosate, or any other pesticides. In the absence of any transformative action on glyphosate at ICCM5 in September, perhaps UNEP could consider preparing a new UN treaty on pesticides that is capable of establishing a global regulatory framework that governments will implement nationally.

4. What factors prevent action/progress on addressing the issue in your country/ organization
(Multiple answers based on list below)?

- Lack of technical capacity
- Lack of scientific knowledge

- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors
- Difficulty with resource mobilisation
- Lack of economically feasible green and sustainable alternatives
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?
- None, there are no factors preventing action or progress
- Other: _Lack of processes that allow progress by the majority (rather than consensus decision making); strong influence from a mighty chemical industry lobby_____**

a. Please explain your response, including examples if possible: __

Multilateral Environmental Agreements depend on consensus decision making, which gives a small number of nations a veto over the views and wishes of the majority of affected countries. For example, the vote on the amendment to the Rotterdam Convention in the 2023 BRS COP was a very mild proposal to combat the blocking of listing of chemicals in order to subject them to Prior Informed Consent procedures, but received huge push back from a handful of influential manufacturing nations (e.g. India, China, Guatemala), and was stopped, against the wishes of the majority of countries.

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

The **Global Alliance to Eliminate Lead Paint** (Lead Paint Alliance) is a voluntary partnership formed by the United Nations Environment Programme (UNEP) and the World Health Organization (WHO). This model of a global Alliance under the roof of SAICM has proved effective and has been proposed by 54 countries in the Africa Group under SAICM as a means of addressing Highly Hazardous Pesticides. It seems to be a positive step to support countries and stakeholders that are willing to work together for progress rather than relying only on agreement by consensus, which effectively gives a veto to any single country against the wishes and needs of the majority.

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Glyphosate](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production**
- Construction
- Electronics
- Energy
- Health
- Labour
- Pharmaceuticals
- Public, private, blended finance
- Retail
- Textiles
- Transportation

- Waste
- Other: _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

International political commitment to reduce the risk to biodiversity from pesticides by at least 50% by 2030 has been made by all parties to the **Convention on Biological Diversity, under Target 7 of the Kunming-Montreal Global Biodiversity Framework (KMGBF)**. Reducing the use of glyphosate would obviously need to play a major role in reaching that target. The indicators for pesticide risk reduction currently in the monitoring framework for Target 7 of the KMGBF are still to be finalised. It is critical that the indicator chosen gives sufficient weight to the combinations of high toxicity, harmful effects, and widespread use of glyphosate so that action to reduce their use is recognised in monitoring and reporting. PAN is recommending that the Ad-Hoc Technical Expert Group on Indicators adopt the Danish Pesticide Load indicator for Target 7 of the Monitoring Framework.

The International Conference on Chemicals Management (ICCM) and its **Strategic Approach to International Chemicals Management (SAICM)**, are in many ways well placed as an international forum, a policy instrument and related mechanisms to address glyphosate. While ICCM and SAICM are not legally binding, ICCM is in effect the main international forum for chemicals and waste policy and governance direction, and the objective of SAICM, as its main policy framework, is ‘the achievement of the sound management of chemicals throughout their life cycle so that by the year 2020, chemicals are produced and used in ways that minimise significant adverse impacts on the environment and human health.’

The SAICM Beyond 2020 Framework – to be finalised at ICCM5 in September 2023 – may set global policy direction for the next decade or more, including for pesticides.

However, there is clear evidence that ICCM and SAICM may not be up to the task. Over a nearly 18 year history, ICCM and SAICM have been woefully unambitious, and have failed to take any widespread or global action on glyphosate or any pesticides commensurate with the harms they cause.

While the draft SAICM Beyond 2020 (laid down in the consolidated outcome document from IP4.2) does include three targets relevant to pesticides, none focus explicitly on or have clear pertinence to glyphosate, and all three Targets remain contested, and may not make it through negotiations. SAICM and ICCM have yet to recognise glyphosate as an Issue of Concern (where it has recognised other categories of chemicals as issues of concern), so even if commitments to work on issues of concern are retained in SAICM Beyond 2020, it remains unclear whether ICCM will recognise glyphosate as an issue of concern in the way UNEP has.

In the absence of meaningful action on glyphosate and other hazardous pesticides within ICCM/SAICM, the UN may need to consider developing a new binding treaty on pesticides, through which countries could be mandated to ensure their pesticides registration and other government agencies follow the best science to ensure a level playing field while meeting international obligations on pollution.

The Joint Meeting on Pesticides Management (JMPPM) also has a role to play in increasing international action on glyphosate, regardless of where else it might occur. While it cannot set the binding law required, it can of course ensure that any future pesticide management guidance it issues (which might itself be referred to in binding agreements) explicitly advises how glyphosate should be regulated and their use reduced in order to meet UN obligations on biodiversity, on human rights, and on human health. UNEP needs to use its new role as a fully-fledged participant in JMPPM to ensure the institution and its products cohere with, complement, and contribute to the delivery of KMGBF Target 7, and that commensurate reductions in glyphosate use is part of the JMPPM's mission

The Science Policy Panel on Chemicals, Waste, and Pollution:

The planned Science Policy Panel on Chemicals, Waste, and Pollution – currently being established under a mandate from a UN Environment Assembly (UNEA) resolution in 2022 – could, perhaps, significantly contribute to bringing countries towards consensus on glyphosate.

There is an important need to transparently, critically, and independently adjudicate the scientific evidence and findings on the impacts and risks of glyphosate, particularly on human health.

Different sets of scientists clearly espouse fundamentally different opinions as to the risks and impacts of glyphosate, and the sources of information they deem appropriate to consider in their determinations.

Multiple reputable scientific studies and scientific and industry bodies find glyphosate to be a probably carcinogen, while most governments – drawing extensively on documentation submitted by applicant companies, find otherwise. Such divergences of scientific opinion have resulted in, for example, the US government authorising glyphosate's use, only for US courts to then fine its manufacturer \$11 billion by for causing cancer in its customers.

The functions of the Science Policy Panel espoused in the UNEA Resolution include horizon scanning; scientific assessments; information provision and dissemination; and information sharing. The last three of these seem pertinent to glyphosate.

If it were able to impartially resist the heightened political and economic forces involved in the glyphosate industry, and demonstrate transparency and impartiality and scientific rigor in doing so, the UN Science Policy Panel on Chemicals, Waste and Pollution could usefully undertake an impassioned review, and offer its considered opinion to stakeholders.

- a. Which international agendas have important linkages with this issue of concern?
(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):

- [Agriculture and Food](#)
- [Biodiversity](#)
- [Climate Change](#)
- [Health](#)
- [Human Rights](#)

- Sustainable Consumption and Production*
- World of Work*
- Other _____*

- b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

Being the most commonly and widely used agricultural herbicide on earth, with significant evidence of serious health risks for users and biodiversity risks, action on glyphosate needs to occur in the fields of agriculture and food, biodiversity, health, human rights, sustainable consumption and production, and in the world of work.

However, the multiple international agendas glyphosate is relevant to does not imply or require multiples of the action required. Sensible and principled regulation that cuts off the supply of glyphosate at source will result in immediate positive outcomes in all of these areas of activity.

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

Regional efforts to assess the risks from hazardous pesticides and take regulatory action help to address issues of limited technical capacity for the assessment process at national level and support effective implementation. This is the approach taken under FAO's MEAs programme in East and Southern Africa, for example.

5. Lead

Screening Question - Lead

Lead is a toxic metal that occurs naturally in the Earth's crust. It may exist in both inorganic and organic forms. The current global uses of lead are in batteries, rolled and extruded products, pigments and other product additives (e.g. for paints, cathode ray tubes, enamels and ceramics, PVC stabilisers), ammunition, alloys, cable sheathing and other uses

Please visit the two-page factsheet on [Lead](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Microplastics)*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Lead

Lead is a toxic metal that occurs naturally in the Earth's crust. It may exist in both inorganic and organic forms. The current global uses of lead are in batteries, rolled and extruded products, pigments and other product additives (e.g. for paints, cathode ray tubes, enamels and ceramics, PVC stabilisers), ammunition, alloys, cable sheathing and other uses

Please visit the two-page factsheet on [Lead](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other _____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
 - Options / guidance for economic instruments
 - Voluntary measures and approaches: (such as Guidelines, principles and strategies)

- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Lead](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

6. Microplastics

Screening Question - Microplastics

Microplastics are solid particles made of synthetic polymers, typically defined as smaller than 5 mm. Microplastics have been intentionally added to a wide range of products and application areas for diverse technical functions. For example, they are added in cosmetics and personal care products, detergents and maintenance products, agriculture and horticulture, medical devices and in vitro diagnostic medical devices, medicinal products for human and veterinary use, food supplements, paints, coatings and inks, oil and gas drilling and production, plastics, technical ceramics, media for abrasive blasting, adhesives, 3D printing materials and printing inks.

Please visit the two-page factsheet on [Microplastics](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Neonicotinoids)*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Microplastics

Microplastics are solid particles made of synthetic polymers, typically defined as smaller than 5 mm. Microplastics have been intentionally added to a wide range of products and application areas for diverse technical functions. For example, they are added in cosmetics and personal care products, detergents and maintenance products, agriculture and horticulture, medical devices and in vitro diagnostic medical devices, medicinal products for human and veterinary use, food supplements, paints, coatings and inks, oil and gas drilling and production, plastics, technical ceramics, media for abrasive blasting, adhesives, 3D printing materials and printing inks.

Please visit the two-page factsheet on [Microplastics](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes
- No
- Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Legally binding
- Soft law
- Information sharing and awareness/ Voluntary initiatives
- No international actions are needed
- Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Regulatory control measures
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)

- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Microplastics](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*

Other: _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food
- Biodiversity
- Climate Change
- Health
- Human Rights
- Sustainable Consumption and Production
- World of Work
- Other _____

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high
- High,
- Medium,
- Low,
- Very low

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

7. Neonicotinoids

Screening Question - Neonicotinoids

Neonicotinoids are a class of neuroactive insecticides chemically related to nicotine. Since the first neonicotinoid (imidacloprid) was commercialized in the 1990s, seven main compounds (acetamiprid, clothianidin, dinotefuran, imidacloprid, nitenpyram, thiamethoxam and thiacloprid) are now available on the global market. Today, neonicotinoids are used in protecting plants, livestock and pets from pest insects, as well as for malaria vector control, i.e., mosquitos, to protect humans, in more than 100 countries. Neonicotinoids are also used as biocides.

Please visit the two-page factsheet on [Neonicotinoids](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Organotins)*
 - Yes
 - No, I do not know enough about this issue
 - No, this issue is not relevant to my country or institution
 - No, other
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Neonicotinoids

Neonicotinoids are a class of neuroactive insecticides chemically related to nicotine. Since the first neonicotinoid (imidacloprid) was commercialized in the 1990s, seven main compounds (acetamiprid, clothianidin, dinotefuran, imidacloprid, nitenpyram, thiamethoxam and thiacloprid) are now available on the global market. Today, neonicotinoids are used in protecting plants, livestock and pets from pest insects, as well as for malaria vector control, i.e., mosquitos, to protect humans, in more than 100 countries. Neonicotinoids are also used as biocides.

Please visit the two-page factsheet on [Neonicotinoids](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

A combination of characteristics, effects and situations make neonicotinoids a significant issue of concern justifying concerted and rapid regulatory reforms. [These include:](#)

- Neonicotinoids are **systemic pesticides**, and are often applied as seed treatment so they are taken up by the plant and transported to all its tissues (leaves, flowers, roots and stems, as well as pollen and nectar), exposing all insects that come into contact with the plant as it grows.
- Their **high toxicity** has potent effect at low concentrations
- Neonicotinoids are **highly persistent** in the environment: Imidacloprid can last for months or years in soil and may leach into groundwater
- They **affect the central nervous system, particularly in insects** – with bees having an enhanced genetic vulnerability because they have more receptors than other insects.
- Neonicotinoids can break **down into more harmful substances**.
- Neonicotinoids are **the most-used insecticides on earth**: by 2008, neonicotinoids had taken a 24% share of the total insecticide market.

Biodiversity Impacts

Neonicotinoid compounds are very highly toxic to a broad spectrum of insect groups, with lethal and non-lethal effects widely impacting non-target species, including pollinators, and insects preying on and acting as natural enemies of pest species.

Pollinators:

Neonicotinoids are known to have a highly and systemically [detrimental effect on pollinators](#), including bees. Thiamethoxam is so toxic that one teaspoon contains a lethal dose for up to [1.25 billion honeybees](#).

In 2017 the European Food Safety Agency (EFSA) judged that the risks to bees presented by all

outdoor uses of [clothianidin](#), [imidacloprid](#), and [thiamethoxam](#) could not be regarded as safe, and since April 2018, all outdoor uses of these three actives has been [banned in the EU](#). Although some 'emergency authorisations' did occur following the bans, legal action taken by PAN Europe resulted in Europe's highest court ruling that [these derogations were not legal](#).

While not linked as a cause colony collapse disorder, neonicotinoids are widely [accepted to be a major stressor](#) contributing to both bee mortality and susceptibility to parasites and viruses that have a recognised causal relationship to colony collapse.

Natural Enemies:

In lab studies, exposure to spray applications at the recommended dose of acetamiprid, clothianidin and [dinotefuran killed 100% of adult *Cryptolaemus montrouzieri* ladybirds](#), an important predator of mealybugs, after 48 hours.

The risks to non-target natural enemies of pest species are high enough for many experts to consider neonicotinoids to be [incompatible with Integrated Pest Management \(IPM\)](#).

There is also evidence that neonicotinoids also [effect the development of other non-insect species](#), including frog embryos.

PAN UK has produced [10 Factsheets](#) on the effects of neonicotinoids on pollinators and bees.

These factors and others, present too great of an unmanageable risk to biodiversity, and food security, to be widely used anywhere. They need to be far more robustly regulated worldwide.

A UN mandate for action:

The role of agricultural pesticide pollution as a driver of global biodiversity loss is recognised in the 2022 Kunming-Montreal Global Biodiversity Framework (KMGBF). Target 7 of that agreement commits countries to reducing the biodiversity-risk of pesticides by at least 50% by 2030.

Significant reductions in neonicotinoid use will need to be a major focus of biodiversity risk reduction strategies worldwide to meet the KMGBF commitment, and would benefit from concerted action by UN agencies that are working to address issues of concern in the management of chemicals.

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)).*

- [Legally binding](#)
- [Soft law](#)
- [Information sharing and awareness/ Voluntary initiatives](#)
- [No international actions are needed](#)
- [Other _____.](#)

a. Please explain your response, including examples if possible*. _____

Only legally binding actions taken internationally will sufficiently regulate the production, trade and use of neonicotinoids in order to adequately mitigate the risks they present.

While soft law, voluntary initiatives and information sharing and awareness can certainly play a part in reducing the use of neonicotinoids, there is a plethora of data indicating that such voluntary or non-mandatory initiatives to remove harmful substances or practices from value chains do not work.

Companies, farmers, and consumers largely operate within the parameters established by governments and enforced under the rule of law.

Where its use remains legally permitted, it is unrealistic to expect companies, farmers and consumers to dramatically reduce or to avoid the use of neonicotinoids – regardless of how much they know about their negative impacts. Regulatory action will also be essential to ensure market participants enjoy a level playing field within and across markets, and can act as a spur to innovation encouraging actors to develop less harmful alternatives.

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? (*Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options*).

- Regulatory control measures*
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: Legally binding international treaty*

a. Please explain your response, including examples if possible: _____

PAN believes that national Regulatory Control measures will need to be the basic conduit of control over neonicotinoids.

Such control measures should include but not be limited to de-registrations of neonicotinoids by national registration agencies, the adaptation and strengthening of Maximum Residual Levels (MRL) legislation to exclude neonicotinoids from export-oriented industrial agriculture, and the implementation of prohibitions on the export of pesticides banned from domestic use.

However, to ensure national regulatory control measures are sufficiently global, and sufficiently harmonised to avoid an un-even international commercial playing field, it may be desirable to invest in the establishment of a new legally binding international treaty on pesticides.

Existing international treaties relevant to pesticides – including the UN's Stockholm Convention and Rotterdam Convention - are woefully inadequate to address the issues

presented by neonicotinoids. They cover only a tiny proportion of pesticide active ingredients, and in most instances do not require national de-registrations or limits on trade or production. While pesticides are a focus of the International Conference on Chemicals Management (ICCM) and the Strategic Approach to International Chemicals Management (SAICM), to date these international forums have, in part due to their voluntary nature, failed to take any widespread meaningful action on neonicotinoids, or any other pesticides. In the absence of any transformative action on neonicotinoids at ICCM5 in September, UNEP may be well advised to begin preparing for a new UN treaty on pesticides that is capable of establishing a global regulatory framework that governments will implement nationally.

4. What factors prevent action/progress on addressing the issue in your country/ organization (Multiple answers based on list below)?

- Lack of technical capacity
- Lack of scientific knowledge
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors
- Difficulty with resource mobilisation
- Lack of economically feasible green and sustainable alternatives
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?
- None, there are no factors preventing action or progress
- Other: _____

a. Please explain your response, including examples if possible: _____

Lack of technical capacity might be an issue in some places especially at local level. However we know from multiple experiences around the globe that capacities - either technical or knowledge – can be built and technical solutions can be found and implemented. [Successful organic cotton growing](#) is one example that provides daily proof.

However, many farmers, and country governments have insufficient capacity to roll out agroecological approaches to agriculture, and the adoption of alternatives to neonicotinoids. Here investment in building these capacities is needed. Gathering scientific knowledge is important and it is an ongoing process. Limited scientific knowledge should not be regarded as an obstacle to taking action on replacing neonicotinoids with non-chemical alternatives, but should be challenged by supporting knowledge building in the field of non-chemical alternatives.

Compounding that, industry and some governments, have promulgated misleading and at times untrue narratives depicting neonicotinoids and other toxic pesticides as indispensable to food security and agricultural export revenues. These narratives can undermine clear political commitments at national and international levels.

With neonicotinoid use reductions being integral to any effort to meet Target 7 of the Kunming-Montreal Global Biodiversity Framework (KMGBF) by 2030, it is critical international agencies and institutions work together to coordinate action and monitoring.

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

The de-registration of various neonicotinoids in the European Union in 2018 shows that national and regional regulatory action to stem the use and negative impacts of neonicotinoids is feasible and replicable.

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Neonicotinoids](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? *(Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...).*

International political commitment to reduce the risk to biodiversity from pesticides by at least 50% by 2030 has been made by all parties to the **Convention on Biological Diversity, under Target 7 of the Kunming-Montreal Global Biodiversity Framework (KMGBF)**. Reducing the use of neonicotinoids would obviously need to play a major role in reaching that target. The indicators for pesticide risk reduction currently in the monitoring framework for Target 7 of the KMGBF are still to be finalised. It is critical that the indicator chosen gives sufficient weight to the combinations of high toxicity, harmful effects, persistence, and widespread use of neonicotinoids so that action to reduce their use is recognised in monitoring and reporting. PAN is recommending that the Ad-Hoc Technical Expert Group on Indicators adopt the Danish Pesticide Load indicator for Target 7 of the Monitoring Framework.

The International Conference on Chemicals Management (IICM) and its **Strategic Approach to International Chemicals Management (SAICM)**, are in many ways well placed as an international forum and a policy instrument and related mechanisms to address neonicotinoids. While ICCM and SAICM are not legally binding, ICCM is in effect the main international forum for chemicals and

waste policy and governance direction, and the objective of SAICM, as its main policy framework, is 'the achievement of the sound management of chemicals throughout their life cycle so that by the year 2020, chemicals are produced and used in ways that minimise significant adverse impacts on the environment and human health.'

The SAICM Beyond 2020 Framework – to be finalised at ICCM5 in September 2023 – may set global policy direction for the next decade or more, including for pesticides.

However, there is clear evidence that ICCM and SAICM may not be up to the task. Over a nearly 18 year history, ICCM and SAICM have been woefully unambitious, and have failed to take any widespread or global action on neonicotinoids or any pesticides that would be commensurate with the harms they cause.

While the draft SAICM Beyond 2020 does include three targets relevant to pesticides, none focus explicitly on or have clear pertinence to neonicotinoids as a group of linked chemicals, and all three Targets remain contested, and may not make it through negotiations. SAICM and ICCM have yet to recognise neonicotinoids as an Issue of Concern (where it has recognised other categories of chemicals as issues of concern), so even if commitments to work on issues of concern are retained in SAICM Beyond 2020, it remains unclear whether ICCM will recognise neonicotinoids as an issue of concern in the way UNEP has.

In the absence of meaningful action on neonicotinoids and pesticides within ICCM/SAICM, the UN may need to consider developing a new binding treaty on pesticides, through which countries could be mandated to ensure their pesticides registration and other government agencies follow the best science to ensure a level playing field while meeting international obligations on pollution.

The Joint Meeting on Pesticides Management (JMPM) also has a role to play in increasing international action on neonicotinoids, regardless of where else it might occur. While it cannot set the binding law required, it can of course ensure that any future pesticide management guidance it issues (which might itself be referred to in binding agreements) explicitly advises how neonicotinoids should be regulated and their use reduced in order to meet UN obligations on biodiversity. UNEP needs to use its new role as a fully-fledged participant in JMPM to ensure the institution and its products cohere with, complement, and contribute to the delivery of KMGBF Target 7, and that commensurate reductions in neonicotinoids use is part of the JMPM's mission.

- a. Which international agendas have important linkages with this issue of concern?
(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):

- Agriculture and Food
- Biodiversity
- Climate Change
- Health
- Human Rights
- Sustainable Consumption and Production
- World of Work
- Other _____

- b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

Neonicotinoids are largely used in agriculture, including on operations growing material for international industrial food markets that have been constructed globally over the past 50 years. As such, the pesticides are also highly relevant to work on Sustainable Production and Consumption, and specifically with transforming the food systems currently contributing to biodiversity loss and climate change.

Their major impact on biodiversity critical to both agricultural and natural ecosystems, including pollinators, make neonicotinoids an issue of particular concern for biodiversity conservation, and specifically to Target 7 of the Global Biodiversity Framework of the CBD.

Their use and effects can have a detrimental effect to human rights, and can result in violations of the human rights to 'a clean, healthy and sustainable environment' (as unanimously adopted in UN General Assembly [Resolution 76/300](#) in 2022) and "a safe and healthy working environment" (adopted by the UN International Labour Organization (ILO) as a fundamental principle and right at work at the 110th Session [International Labour Conference in June 2022](#)).ⁱⁱⁱⁱ

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

8. Organotins

Screening Question - Organotins

Organotins are organic compounds that contain at least one tin-carbon bond. There are four main groups of organotin compounds, which are used in various applications. Mono- and di-organotins are mainly used as heat stabilisers in polyvinyl chloride (PVC) in a wide range of applications, including window frames and house siding, PVC pipes, food contact blister packs and water bottles. Tri-organotins are mainly used as biocides (e.g. in wood preservatives, in anti-fouling paints for boats and in textiles) and as pesticides. Tetra-organotins have been used as intermediates in the preparation of other organotins and as oil stabilisers.

Please visit the two-page factsheet on [Organotins](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Phthalates)*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Organotins

Organotins are organic compounds that contain at least one tin-carbon bond. There are four main groups of organotin compounds, which are used in various applications. Mono- and di-organotins are mainly used as heat stabilisers in polyvinyl chloride (PVC) in a wide range of applications, including window frames and house siding, PVC pipes, food contact blister packs and water bottles. Tri-organotins are mainly used as biocides (e.g. in wood preservatives, in anti-fouling paints for boats and in textiles) and as pesticides. Tetra-organotins have been used as intermediates in the preparation of other organotins and as oil stabilisers.

Please visit the two-page factsheet on [Organotins](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))

- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Organotins](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*

Other: _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other* _____

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

9. Phthalates

Screening Question - Phthalates

Phthalates are a large family of semi-volatile organic compounds. They are a group of plasticizers with softening and elastic effects, and they are produced in high volumes to be used in products such as vinyl flooring, adhesives, detergents, lubricating oils, automotive plastics, plastic clothing and personal care products. Phthalates accounted for 65 per cent of global consumption of plasticizers in 2017.

Please visit the two-page factsheet on [Phthalates](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Polycyclic Aromatic Hydrocarbons (PAHs))*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Phthalates

Phthalates are a large family of semi-volatile organic compounds. They are a group of plasticizers with softening and elastic effects, and they are produced in high volumes to be used in products such as vinyl flooring, adhesives, detergents, lubricating oils, automotive plastics, plastic clothing and personal care products. Phthalates accounted for 65 per cent of global consumption of plasticizers in 2017.

Please visit the two-page factsheet on [Phthalates](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
 - Options / guidance for economic instruments

- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Phthalates](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? *(Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...).*

a. Which international agendas have important linkages with this issue of concern? *(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

10. Polycyclic Aromatic Hydrocarbons (PAHs)

Screening Question - Polycyclic Aromatic Hydrocarbons (PAHs)

Polycyclic aromatic hydrocarbons (PAHs) are a class of more than 100 organic compounds. They occur naturally in coal and crude oil, but are also formed as a by-product during the incomplete combustion from both natural (e.g. volcanic eruptions, burning of coal, oil and gas) or anthropogenic (e.g. vehicle emissions, industrial processes, food preparation) sources. PAHs may also be present in consumer products (e.g. plastic components, footwear); however, they are never intentionally added during manufacturing. Plant-based foods may contain PAHs as a result of pollutant deposition before harvest.

Please visit the two-page factsheet on [Polycyclic Aromatic Hydrocarbons](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Triclosan)*
 - Yes*
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Polycyclic Aromatic Hydrocarbons (PAHs)

Polycyclic aromatic hydrocarbons (PAHs) are a class of more than 100 organic compounds. They occur naturally in coal and crude oil, but are also formed as a by-product during the incomplete combustion from both natural (e.g. volcanic eruptions, burning of coal, oil and gas) or anthropogenic (e.g. vehicle emissions, industrial processes, food preparation) sources. PAHs may also be present in consumer products (e.g. plastic components, footwear); however, they are never intentionally added during manufacturing. Plant-based foods may contain PAHs as a result of pollutant deposition before harvest.

Please visit the two-page factsheet on [Polycyclic Aromatic Hydrocarbons](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures

- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Polycyclic Aromatic Hydrocarbons](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*

- Textiles*
- Transportation*
- Waste*
- Other:* _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other* _____

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

11. Triclosan

Screening Question - Triclosan

Triclosan is a synthetic, broad-spectrum antibacterial chemical used as an additive in thousands of consumer and medical antibacterial products and plastics. It has been used commercially across the globe since the 1970s. Major global use is in cosmetics and personal care products (68%, particularly deodorants) followed by disinfection and medical use (16%) and lower amounts in paints (8%), and in plastic materials, toys and appliances (8%).

Please visit the two-page factsheet on [Triclosan](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Chemicals in Products (CiP))*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Triclosan

Triclosan is a synthetic, broad-spectrum antibacterial chemical used as an additive in thousands of consumer and medical antibacterial products and plastics. It has been used commercially across the globe since the 1970s. Major global use is in cosmetics and personal care products (68%, particularly deodorants) followed by disinfection and medical use (16%) and lower amounts in paints (8%), and in plastic materials, toys and appliances (8%).

Please visit the two-page factsheet on [Triclosan](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Regulatory control measures
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
 - Options / guidance for economic instruments

- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Triclosan](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

12. Chemicals in products (CiP)

Screening Question - Chemicals in products (CiP)

Chemicals may be released at any stage of a product's life cycle (including production, use, recycling or reuse, end-of-life disposal), resulting in potential exposures for humans and the environment. Information exchange in the value chain is fundamental for manufacturers, brands, retailers, end-consumers, waste managers and regulators in identifying and soundly managing any chemicals of technical, environmental or human health concerns in products.

CiP was identified as an issue of concern under SAICM at ICCM2 in 2009, "with a view of taking appropriate cooperative actions, to consider the need to improve the availability of and access to information on chemicals in products in the supply chain and throughout their life cycle". SAICM stakeholders also identified four priority sectors: textiles, toys, building products and electronics.

Please visit the two-page factsheet on [Chemicals in Products](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Endocrine-disrupting chemicals (EDCs))*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Chemicals in products (CiP)

Chemicals may be released at any stage of a product's life cycle (including production, use, recycling or reuse, end-of-life disposal), resulting in potential exposures for humans and the environment. Information exchange in the value chain is fundamental for manufacturers, brands, retailers, end-consumers, waste managers and regulators in identifying and soundly managing any chemicals of technical, environmental or human health concerns in products.

CiP was identified as an issue of concern under SAICM at ICCM2 in 2009, "with a view of taking appropriate cooperative actions, to consider the need to improve the availability of and access to information on chemicals in products in the supply chain and throughout their life cycle". SAICM stakeholders also identified four priority sectors: textiles, toys, building products and electronics.

Please visit the two-page factsheet on [Chemicals in Products](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes
- No
- Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Legally binding
- Soft law
- Information sharing and awareness/ Voluntary initiatives
- No international actions are needed
- Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Regulatory control measures

- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Chemicals in Products](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*

- Textiles*
- Transportation*
- Waste*
- Other:* _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other* _____

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available*).

13. Endocrine-disrupting chemicals (EDCs)

Screening Question - Endocrine-disrupting chemicals (EDCs)

An EDC is an exogenous substance or mixture that alters the function(s) of the endocrine system and consequently causes adverse health effects in an intact organism, or its progeny, or (sub)populations. Substantial efforts have been made over the past two decades to develop a better scientific understanding of EDCs and their characteristics, to test and identify EDCs, and to develop scientific approaches in order to support risk management measures.

In 2012, at ICCM3, EDCs were identified as an issue of concern under SAICM, and SAICM stakeholders decided “to implement cooperative actions on endocrine-disrupting chemicals with the overall objective of increasing awareness and understanding among policymakers and other stakeholders” and invited IOMC organisations to lead and facilitate a series of cooperative actions on EDCs, which was renewed in a Resolution at ICCM4.

Please visit the two-page factsheet on [Endocrine Disrupting Chemicals](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Environmentally Persistent Pharmaceutical Pollutants (EPPPs))*

- Yes**
- No, I do not know enough about this issue*
- No, this issue is not relevant to my country or institution*
- No, other*

- b. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Endocrine-disrupting chemicals (EDCs)

An EDC is an exogenous substance or mixture that alters the function(s) of the endocrine system and consequently causes adverse health effects in an intact organism, or its progeny, or (sub)populations. Substantial efforts have been made over the past two decades to develop a better scientific understanding of EDCs and their characteristics, to test and identify EDCs, and to develop scientific approaches in order to support risk management measures.

In 2012, at ICCM3, EDCs were identified as an issue of concern under SAICM, and SAICM stakeholders decided “to implement cooperative actions on endocrine-disrupting chemicals with the overall objective of increasing awareness and understanding among policymakers and other stakeholders” and invited IOMC organisations to lead and facilitate a series of cooperative actions on EDCs, which was renewed in a Resolution at ICCM4.

Please visit the two-page factsheet on [Endocrine Disrupting Chemicals](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- x Yes*
- No*
- Don't know*

- a. Please provide a brief explanation for your response*. _____

Activities to reduce and prevent human and environmental exposure to EDCs are urgently needed. Science has no doubt that EDCs cause great health and economic impacts (see e.g. the [scientific statement](#) of the Endocrine Society at their information website: <https://www.endocrine.org/topics/edc>).

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- x Legally binding*
- x Soft law*
- x Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- x Other: include EDC criteria in GHS_____.*

- a. Please explain your response, including examples if possible*. _____

Legally binding: Only legally binding actions taken internationally will sufficiently regulate the production, trade and use of EDCs in order to adequately mitigate the risks they present.

While soft law, voluntary initiatives and information sharing and awareness can certainly play a part in reducing the use of EDCs, there is a plethora of data indicating that such voluntary or non-mandatory initiatives to remove harmful substances or practices from value chains do not work.

Companies, farmers, and consumers largely operate within the parameters established by governments and enforced under the rule of law.

Where their use remains legally permitted, it is unrealistic to expect companies, farmers and consumers to dramatically reduce or to avoid the use of EDCs – regardless of how much they know about their negative impacts. Regulatory action will also be essential to ensure market participants enjoy a level playing field within and across markets, and can act as a spur to innovation encouraging actors to develop less harmful alternatives.

Soft law: Awareness raising on national level as an element of national EDC action plans. See established EDC action plans from [Denmark](#), [Sweden](#), [France](#), [Belgium](#).

Information sharing and awareness / Voluntary initiatives: There are multiple scientific research activities on EDCs, that have improved our understanding of the endocrine mechanism of action, the identification of adverse effects on human health and wildlife from exposure to endocrine disruptors, and the development of tools for identification of endocrine disruptors and exposure assessment. Here are some examples from the EU: Science on endocrine disruption by the European Commission and by EU agencies, namely the [Joint Research Centre \(JRC\)](#), the [European Food Safety Authority \(EFSA\)](#) and the [European Chemicals Agency \(ECHA\)](#). In addition to research on new testing methods for endocrine disruptors funded under [Horizon 2020](#), a special effort was made in recent years to further improve the availability of test guidelines for identification of endocrine disruptors and address the testing weaknesses identified at EU and international level, under the auspices of the Organisation for Economic Co-operation and Development. (for more see [EU Research on Endocrine Disruptors](#))

Other: Including EDC status as a criteria within the GHS would help ensure countries are aware of and able to monitor trade in EDCs.

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)).*

- x Regulatory control measures*
- x Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))*
- x Options / guidance for economic instruments*
- x Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- x Measures supporting science-based knowledge and research*

Other: _____

a. Please explain your response, including examples if possible: _____

Regulatory Control Mechanisms: PAN believes that national Regulatory Control measures will need to be the basic conduit of control over EDCs.

Such control measures should include but not be limited to de-registrations of EDCs by national registration agencies, the adaptation and strengthening of Maximum Residual Levels (MRL) legislation to exclude EDCs from export-oriented industrial agriculture, and the implementation of prohibitions on the export of pesticides banned from domestic use.

Measures supporting science-based knowledge and research: There is a need for the adoption of reliable science-based methodologies to define hazard classes for endocrine disruptors and suspected endocrine disruptors for human health and for the environment, which can underpin legislation on EDCs nationally. Initiatives taken in the European Union are well placed to inform such developments (see question 5, below)

4. What factors prevent action/progress on addressing the issue in your country/ organization (*Multiple answers based on list below*)?

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- x Other:* _____

a. Please explain your response, including examples if possible: _____

One main factor that prevents action/progress on addressing the issue of EDCs is lack of political will to act and priority setting. The science and knowledge is there.

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? (*Open space answer. Please share a weblink to the initiative(s) if available*).

The European Commission has published a [Delegated Regulation amending CLP Regulation](#) (Regulation (EC) No 1272/2008), which sets out new hazard classes and criteria for the classification, labelling and packaging of substances and mixtures. Among others, this includes new hazard classes for endocrine disruptors and suspected endocrine disruptors for human health and for the environment. The new rules came into force in April 2023.

Complementing this, the EU [pesticide regulation](#) and EU [biocide regulation](#) exclude pesticides that meet the CLP's EDC criteria from approval in the EU, thereby directly linking science-based classifications to market access.

Some EU-member states have already established EDC action plans (Denmark, Sweden, France, Belgium); Germany is currently developing an EDC action plan in line with the commitment made in the coalition agreement of the German government. German civil society organisations formulated concrete recommendations for a German EDC Action Plan already in 2021.

Adoption of these types of approaches to pesticide management and science-based decision making should be scaled up globally.

Another initiative worth pursuing would be to include EDC classifications into the GHS-System, as proposed in UNEP's assessment report on IoCs (see UNEP fact sheet Endocrine Disruptors), which rightly states that "an important milestone could be the exploration of the possible inclusion of EDCs in the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)". Incorporating EDCs into the GHS would be an important step to better inform countries worldwide about trade in EDCs and help monitor progress in reducing the use and impacts of EDCs.

6. Which sectors/value chains need to be closely involved in developing solutions? (*Multi-choice. Please visit the two-page factsheet on [Endocrine Disrupting Chemicals](#) for more information on the topic. If you select "Other", please elaborate your response.*)

- [x Agriculture and food production](#)
- [Construction](#)
- [Electronics](#)
- [Energy](#)
- [x Health](#)
- [x Labour](#)
- [Pharmaceuticals](#)
- [Public, private, blended finance](#)
- [x Retail](#)
- [x Textiles](#)
- [Transportation](#)
- [x Waste](#)
- [x Other: every day products: toys, plastics, food contact materials etc.](#)

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

Under the roof of the new SAICM beyond 2020, IOMCs are well suited to lead international action on this issue. Involved intergovernmental bodies should be - among others - UNEP, FAO, WHO and ILO.

The Science Policy Panel on Chemicals, Waste, and Pollution: The planned Science Policy Panel on Chemicals, Waste, and Pollution – currently being established under a mandate from a UN Environment Assembly (UNEA) resolution in 2022 – could be perhaps significantly contribute to

consensus on which substances are EDCs, for example by recognising the most scientifically credible criteria and methodology for classifying EDCs (for example the criteria used by the EU). This would help countries adopt credible systems to aid in decision making on domestic regulations.

- a. Which international agendas have important linkages with this issue of concern? *(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

- x Agriculture and Food*
- x Biodiversity*
- Climate Change*
- x Health*
- x Human Rights*
- x Sustainable Consumption and Production*
- x World of Work*
- x Other children rights, drinking water protection* _____

- b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

As highly hazardous substances, EDCs are relevant a to most spaces of private, public and work life as well as for all environmental protection goals.

The link to children rights is very important because of the high impacts that endocrine disrupting chemicals have effect on the unborn, babies and young children, including their potential to cause developmental defects of the brain (behaviour) and their effects on the reproductive organs.

EDCs can also negatively affect the health and survival of animals. They can affect their growth, sex, behaviour and reproduction, which can lead to negative population effects. (<https://www.eea.europa.eu/publications/the-impacts-of-endocrine-disrupters>) For example, polychlorinated biphenyls (PCBs) can cause infertility and hermaphroditism in polar bears. The effects of the endocrine disruptive biocide tributyltin (TBT) used in antifouling ship paint contaminated the marine environment and led to infertility and formation of penises in female marine snails (called "imposex") even at the lowest TBT concentrations in the nanogram range.

After a [2008 global ban on the use of EDC organotins in antifouling paints](#) on all marine boats and ships came into effect, the intensity of imposex decreased strongly.

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available.*)

Some EU-member states have already established EDC action plans ([Denmark](#), [Sweden](#), [France](#), [Belgium](#)); Germany is currently developing an EDC action plan in line with the commitment made in the coalition agreement of the German government. German civil society organisations formulated concrete [recommendations for a German EDC Action Plan](#) already in 2021. Adopting such plans should be a global priority for all countries.

10. Is there any priority further work you would like to suggest at the regional level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available.*)

Our suggestions below relate to EU level.

As EU countries are part of two UN regions, we suggest WEOG (Western European and Others Group) and EEG (Eastern European Group) region to discuss a way forward on the issue of EDCs, recognizing the EU approach(es) and including approaches from the other countries of both UN regions.

On EU level we suggest: Effective and rapid implementation of current EU regulations on EDC identification and exclusion provisions according to the Pesticide legislation (Regulation (EC) No 1107/2009) and Biocide legislation (Regulation (EU) 528/2012); no longer delay of the REACH revision taking account comparable identification and evaluation criteria for ED substances, as well as the adaptation of other legislations such as that for cosmetics, toys, etc.

Concerted actions for an EU-wide harmonized action plan on EDCs, see the position of EDC Free Europe [“Our eight demands for an EU EDC strategy”](#) (2018)

Implementation legal binding and other initiatives reducing the use and the exposure of EDCs in the EU towards the objectives of the EU Green Deal, especially:

[Chemicals Strategy for Sustainability towards a toxic-free environment](#): e.g. banning the most harmful chemicals in consumer products, account for the cocktail effect of chemicals when assessing risks from chemicals, playing a leading role globally by championing and promoting high standards and not exporting chemicals banned in the EU.

[Zero Pollution Action Plan towards zero pollution for air, water and soil](#) to better prevent, remedy, monitor and report on pollution.

[Farm to Fork Strategy](#) and the [Biodiversity Strategy for 2030](#): both among other objectives: 50% use reduction of highly hazardous pesticides “candidates for substitution”, like ED pesticides until 2030).

14. Environmentally Persistent Pharmaceutical Pollutants (EPPPs)

Screening Question - Environmentally Persistent Pharmaceutical Pollutants (EPPPs)

Pharmaceuticals, including antibiotics, and their metabolites can enter the environment through a variety of pathways, including wastewater and solid waste from pharmaceutical manufacturing, consumption and excretion, improper disposal of unused or expired products, animal husbandry and aquafarming. Their presence in the environment may result in different adverse effects on wildlife and ecosystems; some well-known cases include endangerment of some vulture species, reproductive failures in fish, and the development of antimicrobial resistance.

Internationally, EPPPs were recognized as an issue of concern under SAICM at ICCM4 in 2015. The same resolution “considers that information dissemination and awareness-raising on EPPP are particularly relevant and that improving the availability of and access to information on such chemicals is a priority”, “recognizes the current knowledge gaps on exposure to and the effects of EPPP”, “decides to implement cooperative actions on EPPP with the overall objective of increasing awareness and understanding among policymakers and other stakeholders”, and “requests all interested stakeholders and organizations to provide support, including expertise, financial and in-kind resources, on a voluntary basis, for such cooperative action, including by participating in developing and making available relevant information and guidance”

Please visit the two-page factsheet on [Environmentally Persistent Pharmaceutical Pollutants](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Hazardous substances within the life cycle of electrical and electronic products (HSLEEP))*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Environmentally Persistent Pharmaceutical Pollutants (EPPPs)

Pharmaceuticals, including antibiotics, and their metabolites can enter the environment through a variety of pathways, including wastewater and solid waste from pharmaceutical manufacturing, consumption and excretion, improper disposal of unused or expired products, animal husbandry and aquafarming. Their presence in the environment may result in different adverse effects on wildlife and ecosystems; some well-known cases include endangerment of some vulture species, reproductive failures in fish, and the development of antimicrobial resistance.

Internationally, EPPPs were recognized as an issue of concern under SAICM at ICCM4 in 2015. The same resolution “considers that information dissemination and awareness-raising on EPPP are particularly relevant and that improving the availability of and access to information on such chemicals is a priority”, “recognizes the current knowledge gaps on exposure to and the effects of EPPP”, “decides to implement cooperative actions on EPPP with the overall objective of increasing awareness and understanding among policymakers and other stakeholders”, and “requests all interested stakeholders and organizations to provide support, including expertise, financial and in-kind resources, on a voluntary basis, for such cooperative action, including by participating in developing and making available relevant information and guidance”

Please visit the two-page factsheet on [Environmentally Persistent Pharmaceutical Pollutants](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*
 - Yes
 - No
 - Don't know
 - a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
 - Legally binding
 - Soft law
 - Information sharing and awareness/ Voluntary initiatives
 - No international actions are needed
 - Other ____.
 - a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Regulatory control measures*
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Environmentally Persistent Pharmaceutical Pollutants](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*

- Electronics*
- Energy*
- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

15. Hazardous substances within the life cycle of electrical and electronic products
(HSLEEP)

Screening Question - Hazardous substances within the life cycle of electrical and electronic products (HSLEEP)

Electrical and electronic products (EEP), also referred to as electronic and electrical equipment (EEE), include any device with a circuit, battery or plug. They can contain many chemical additives for certain properties such as flame retardancy. Some chemical additives may be hazardous, including heavy metals and persistent organic pollutants (POPs), and may be released during production, use, transport, and end-of-life treatment (disposal or recycling), leading to environmental and human exposures and possible adverse effects.

HSLEEP was adopted as an EPI at ICCM2 in 2009. Conscious that actions are needed up-, mid- and downstream, a life cycle approach was endorsed. Despite valuable efforts made at all levels, significant challenges remain in regard to identifying, disseminating and implementing best practices at all stages of the life cycle, including design, recycling and disposal.

Please visit the two-page factsheet on [Hazardous Substances within the Life cycle of Electrical and Electronic Products](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Highly Hazardous Pesticides (HHPs))*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*

- a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Hazardous substances within the life cycle of electrical and electronic products (HSLEEP)

Electrical and electronic products (EEP), also referred to as electronic and electrical equipment (EEE), include any device with a circuit, battery or plug. They can contain many chemical additives for certain properties such as flame retardancy. Some chemical additives may be hazardous, including heavy metals and persistent organic pollutants (POPs), and may be released during production, use, transport, and end-of-life treatment (disposal or recycling), leading to environmental and human exposures and possible adverse effects.

HSLEEP was adopted as an EPI at ICCM2 in 2009. Conscious that actions are needed up-, mid- and downstream, a life cycle approach was endorsed. Despite valuable efforts made at all levels, significant challenges remain in regard to identifying, disseminating and implementing best practices at all stages of the life cycle, including design, recycling and disposal.

Please visit the two-page factsheet on [Hazardous Substances within the Life cycle of Electrical and Electronic Products](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes
- No
- Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Legally binding
- Soft law
- Information sharing and awareness/ Voluntary initiatives
- No international actions are needed
- Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to*

the [catalogue of international actions](#) prepared by UNEP for more information on available options).

- Regulatory control measures
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)
- Options / guidance for economic instruments
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)
- Measures supporting science-based knowledge and research
- Other: _____

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization (Multiple answers based on list below)?

- Lack of technical capacity
- Lack of scientific knowledge
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors
- Difficulty with resource mobilisation
- Lack of economically feasible green and sustainable alternatives
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?
- None, there are no factors preventing action or progress
- Other: _____

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? (Open space answer. Please share a weblink to the initiative(s) if available).

6. Which sectors/value chains need to be closely involved in developing solutions? (Multi-choice. Please visit the two-page factsheet on [Hazardous Substances within the Life cycle of Electrical and Electronic Products](#) for more information on the topic. If you select "Other", please elaborate your response).

- Agriculture and food production
- Construction
- Electronics
- Energy
- Health

- Labour
- Pharmaceuticals
- Public, private, blended finance
- Retail
- Textiles
- Transportation
- Waste
- Other: _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? *(Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...).*

a. Which international agendas have important linkages with this issue of concern? *(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

- Agriculture and Food
- Biodiversity
- Climate Change
- Health
- Human Rights
- Sustainable Consumption and Production
- World of Work
- Other _____

b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

8. What priority level do you attach to this issue for international action?

- Very high
- High,
- Medium,
- Low,
- Very low

9. Is there any priority further work you would like to suggest at the national level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

16. Highly hazardous pesticides (HHPs)

Screening Question - Highly hazardous pesticides (HHPs)

The FAO and WHO International Code of Conduct on Pesticide Management defines HHPs as: “Pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as the WHO or the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous”.

At ICCM4 in 2015, HHPs were identified as an issue of concern. In addition, among other actions, governments and other stakeholders supported “concerted action to address HHPs in the context of SAICM” and encouraged “relevant stakeholders to undertake concerted efforts to implement the strategy at the local, national, regional and international levels, with emphasis on promoting agroecologically-based alternatives and strengthening national regulatory capacity to conduct risk assessment and risk management, including the availability of necessary information, mindful of the responsibility of national and multinational enterprises”, and welcomed “the offer of the FAO, UNEP and WHO to develop modalities for international coordination in the context of the IOMC”

Please visit the two-page factsheet on [Highly Hazardous Pesticides](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Lead in Paint)*
 - x Yes**
 - No, I do not know enough about this issue*
 - No, this issue is not relevant to my country or institution*
 - No, other*
- a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Highly hazardous pesticides (HHPs)

The FAO and WHO International Code of Conduct on Pesticide Management defines HHPs as: “Pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment according to internationally accepted classification systems such as the WHO or the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) or their listing in relevant binding international agreements or conventions. In addition, pesticides that appear to cause severe or irreversible harm to health or the environment under conditions of use in a country may be considered to be and treated as highly hazardous”.

At ICCM4 in 2015, HHPs were identified as an issue of concern. In addition, among other actions, governments and other stakeholders supported “concerted action to address HHPs in the context of SAICM” and encouraged “relevant stakeholders to undertake concerted efforts to implement the strategy at the local, national, regional and international levels, with emphasis on promoting agroecologically-based alternatives and strengthening national regulatory capacity to conduct risk assessment and risk management, including the availability of necessary information, mindful of the responsibility of national and multinational enterprises”, and welcomed “the offer of the FAO, UNEP and WHO to develop modalities for international coordination in the context of the IOMC”

Please visit the two-page factsheet on [Highly Hazardous Pesticides](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes*
- No*
- Don't know*

a. Please provide a brief explanation for your response*. _____

Yes, we agree that further international action on HHPs is needed. While all pesticides have unwanted negative effects on human health, animal health and the environment, Highly Hazardous Pesticides² are of particular concern. Though HHPs constitute a relatively small share of all pesticides in use globally, [they cause the most harm](#), including severe acute and chronic effects to human health with around 400 million occupational pesticide poisonings in the agricultural sector, including at least 10,000 deaths, an unknown number of long-term effects and over 150,000 pesticide-related suicides.

There is particular concern in low – and middle – income countries (LMICs) where HHPs have the most impacts. Although the need for action has been recognised for a long time, e.g. by the FAO council in 2006 proposing “[a progressive ban of highly hazardous pesticides \(HHPs\)](#)”, SAICM has failed to date to achieve sound management of pesticides. The international engagement within SAICM has been insufficient and - as stated by the [2020 UNEP assessment report](#) - “progress since has been uneven across countries and regions”.

2. What types of international actions should be taken? (*Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)*).

- x Legally binding*
- x Soft law*
- x Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- Other _____.*

a. Please explain your response, including examples if possible*. _____

The globally widespread negative effects of HHPs on people's health, the environment, on biodiversity and human rights do not allow any delay in action. While an international legally binding mechanism or a kind of global pesticide treaty would provide the most comprehensive, reliable and just frame to secure protection from harm caused by pesticides in general and specifically by HHPs, soft law, voluntary initiatives and non-binding international agreements are important measures to address HHPs as long as legally binding options are not in place.

Legally binding action: Legally binding actions are the most effective choice to prevent harm from HHPs to biodiversity, the environment and people. However, as long as no legally binding mechanism is in place, soft law, voluntary initiatives and information sharing and awareness programs can support reducing the use of HHPs and promote the use of less harmful alternatives. Engagement in voluntary or non-mandatory initiatives, information and awareness raising however must never slow down the engagement towards legally binding activities.

Legally binding conventions like Stockholm and Rotterdam convention and the Montreal Protocol only covers around 4 Percent of all pesticide active ingredients globally on the market. The lack of a legally binding instrument for all pesticides in use was pointed out in 2017 by the [UN Special Rapporteur on the right to food](#). In her report, the Special Rapporteur proposed a global legally binding treaty for the life-cycle management of pesticides, including the phasing out of HHPs.

The lack of a global treaty on the life-cycle management of hazardous pesticides leaves a critical gap in the human rights protection framework, as well as the global environmental protection framework. Legally binding action to support non-chemical alternatives to pesticides/HHPs could also be a step towards reducing the negative effects related to the pesticide production, use and disposal.

If integrated pest management was implemented as binding minimum standard in agriculture - making it mandatory to first make use of all non-chemical measures to prevent pest pressure and manage plant protection in a really integrated way, before allowing the use of chemical pesticides only as a last resort- this would contribute tremendously to achieve the goal of sound management of chemicals and waste.

While pesticides - especially HHPs - are a focus under the Strategic Approach to International Chemicals Management (SAICM), to date no widespread meaningful action on HHPs, or any other pesticides has been made under this non-binding framework so far. If no meaningful transformative action on HHPs is channelled at ICCM5 in September, UNEP may be well advised to begin preparing for a new UN treaty on pesticides that is capable of establishing a global regulatory framework that governments will implement nationally.

Soft law, voluntary initiatives: Multiple reports and studies – from community based monitoring surveys to national reports and scientific publications - have provided proof that the existing global governance of pesticides is inadequate and that the Sound Management of Chemicals will not be achieved, unless there are dramatic improvements in this governance. SAICM Beyond 2020 needs to seize the opportunity to develop an ambitious international framework to prevent and eliminate adverse impacts of pesticides on the health of people and the environment, with a specific focus on HHPs. The Global Alliance on HHPs as proposed by the African region at IP4.2 could be such a “voluntary initiative” under the non-binding frame of SAICM Beyond 2020. The Global Alliance on lead in paint has shown that such initiatives under the roof of SAICM can stipulate national action and improvements (also by implementing new laws) at national level.

Information sharing / awareness raising: With regard to the identification and detailed description of the hazards and risks associated with pesticides in general and HHPs in particular, of the negative impacts on humans, human rights, animals and the environment, we believe that sufficient material has already been compiled over the past decades to finally take action towards global phase-out of HHPs. We still see the need for enhanced information sharing and awareness raising in the field of non-chemical alternatives, e.g. information and experience sharing on how to facilitate phase-out of HHPs in agriculture and phase-in sustainable non-chemical alternatives. A Global Alliance on HHPs under the roof of SAICM could support this information exchange. Champion countries could present their success and serve as models to other countries. Constraints could be overcome jointly by sharing experiences (practical, governmental and legal).

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- x Regulatory control measures*
- x Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))*
- x Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- x Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

Regulatory Control Measures should include but not be limited to: legislation mandating the classification of EDCs against pertinent hazard criteria, de-registrations of EDCs by national registration agencies, the adaptation and strengthening of Maximum Residual Levels (MRL) legislation to exclude EDCs from export-oriented industrial agriculture, and the implementation of prohibitions on the export of pesticides banned from domestic use.

4. What factors prevent action/progress on addressing the issue in your country/ organization
(Multiple answers based on list below)?

- Lack of technical capacity
- Lack of scientific knowledge
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors
- x Difficulty with resource mobilisation**
- Lack of economically feasible green and sustainable alternatives
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?
- None, there are no factors preventing action or progress
- x Other: economic strength and influence of pesticides industry and proponents; lack of an official HHP substance list**
- _____
- [PG1]Not sure, that we want to point out to this, it is not very diplomatic (even though very true) (might fire back?)
- _____

a. Please explain your response, including examples if possible: _____

More sustainable alternatives to the use of highly hazardous pesticides exist. Even though technical capacity might be an issue in some places at local level, we know from multiple experiences around the globe, that capacities - either technical or knowledge – can be built and technical solutions can be found and implemented. Gathering scientific knowledge is important and it is an ongoing process. We do not regard the lack of scientific knowledge as an obstacle to take action on HHPs. Gathering additional knowledge e.g. regarding alternatives is important but should not prevent action now.

Difficulties with resource mobilisation is an issue, though it might show differently in different regions and organisations. In Germany for example (PAN International has member organisations from Germany) the introduction of a risk based fee on pesticides could support transition towards pesticide risk reduction and could serve as a tool to gain financial support for farmers to master the transition towards less and less harmful pesticides and towards non-chemical alternatives with less negative external effects ([GLS Report 2021](#)). However, the political will to implement such a tool in Germany is lacking amongst some of the leading parties. The example from Denmark shows, that “the pesticide tax in Denmark has led to a significant reduction in the sales of pesticides and a reduction in pesticide load on human health, nature and groundwater for all cases except fungicides” ([UNEP 2020](#)).

Lack of an official HHP-list: In 2007 the WHO/FAO Joint Meeting on Pesticide Management (JMPM) developed criteria for identifying HHPs and recommended that “a list be prepared, and regularly reviewed and updated” ([JMPM report 2007](#)). No list has been developed since, even though the identification of HHPs is repeatedly referred to as the first step in taking action.

Another factor preventing action/progress is the influence and economic power of the pesticide industry. The top four firms – Syngenta Group, Bayer, Corteva and BASF – controlled around 70 percent of the global pesticide market in 2018. 25 years earlier, their market share was only 29

percent. This shows the market strength of these corporations ([Pesticide Atlas 2023](#)). Also FAO/WHO have highlighted “Entrenched commercial interests in maintaining the production, export and use of highly hazardous pesticides” ([FAO/WHO 2019](#))

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? (*Open space answer. Please share a weblink to the initiative(s) if available.*)

Initiatives that enhance the phase-out of HHPs or that support implementation and upscaling of non-chemical alternatives exist on different levels (voluntary, legally binding) and in different regions/countries.

Example from the EU: As set by EU Regulation 1107/2009, active ingredients which meet defined cut-off or exclusion criteria – a GHS classification as mutagenic, carcinogenic or harmful to reproduction or the endocrine system OR being PBT or POPs – will not be approved (very narrow derogations exists). The approval of active ingredients (which comes before the authorization of pesticide products) is granted only for a limited period (generally 10 years). For a renewal, new (scientific) data must be included in the decision-making process. This process supports the phase-out of highly hazardous pesticides.

Examples of success stories from around the world on organic agriculture and agroecology: [FAO scaling up Agroecology](#), [International People’s Agroecology Multiversity \(IPAM\)](#) - research-learning-action approach to agroecology that focuses on small-food producers and farming communities, Collaborative Success of Organic Cotton and Textiles producers.

6. Which sectors/value chains need to be closely involved in developing solutions? (*Multi-choice. Please visit the two-page factsheet on [Highly Hazardous Pesticides](#) for more information on the topic. If you select "Other", please elaborate your response.*)

- x Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- x Health*
- x Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- x Textiles*
- Transportation*
- Waste*
- x Other: standard setting organisations and organic agriculture umbrella organisations* _____

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

For the development and regular update of an official HHP list: FAO/WHO Joint meeting of pesticide Management (JMPPM).

For the Global Alliance on HHPs as proposed by the African Group at SAICM IP4.2: The Alliance is proposed as a voluntary, collaborative and multi-stakeholder initiative under the auspices of the Food and Agriculture Organisation (FAO), the United Nations Environment Programme (UNEP), the World Health Organisation (WHO) and the International Labour Organisation (ILO).

For advancing a legally binding mechanism for pesticides in general including HHPs: In the absence of meaningful progress on addressing pesticides in general and specifically HHPs under SAICM, the UN may need to consider developing a new binding treaty.

For meeting the global pesticide reduction targets under the CBD: International political commitment to reduce the risk to biodiversity from pesticides by at least 50% by 2030 has been made by all parties to the Convention on Biological Diversity, under Target 7 of the Kunming-Montreal Global Biodiversity Framework (KMGBF). Reducing the use of HHPs that are “acknowledged to present particularly high levels of acute or chronic hazards to [...] environment” and “appear to cause severe or irreversible harm to health or the environment under conditions of use” will obviously need to play a major role in reaching that target. The indicators for pesticide risk reduction currently in the monitoring framework for Target 7 of the KMGBF are still to be finalised. PAN is recommending that the Ad-Hoc Technical Expert Group on Indicators adopt the Danish Pesticide Load indicator for Target 7 of the Monitoring Framework.

- a. Which international agendas have important linkages with this issue of concern?
(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):

- x Agriculture and Food*
- x Biodiversity*
- x Climate Change*
- x Health*
- x x Human Rights*
- x Sustainable Consumption and Production*
- x World of Work*
- Other _____*

- b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

The production, use and disposal of pesticides, especially of HHPs, is interlinked with multiple international agendas in many ways. Phasing-out HHPs from agriculture is essential to fulfil the recently set goal by the [COP 15 of the Convention on Biological Diversity CBD](#) to “reduce by half the overall risk posed by pesticides and highly hazardous chemicals”.

Without addressing HHPs and making progress towards a phase-out from agriculture, the achievement of sustainable development is not feasible. ICCM4 supported concerted action to address HHP, “with emphasis on promoting agroecologically based alternatives”.

In fact, while continuing the use of HHPs will prevent the achievement of many Sustainable Development Goals (SDGs), agroecology contributes to 17 SDGs, including:

- **SDG 1** End poverty: improves incomes and economic resilience;
- **SDG 2** End hunger: provides safe nutritious food for all;
- **SDG 3** Healthy lives and well-being: ends pesticide poisoning by phasing out HHPs;
- **SDG 4** Life-long learning: stimulates farmer-to-farmer learning;
- **SDG 5** Empower women and girls: makes visible and values their contribution in food systems;
- **SDG 6** Sustainable water management: keeps clean and captures, conserves and stores in soil;
- **SDG 7** Sustainable energy: supports efficient energy flows within the agroecosystem;
- **SDG 8** Decent work for all: fosters skills, improved incomes, avoiding hazardous chemicals;
- **SDG 9** Foster innovation: encourages farmer-scientist partnerships;
- **SDG 10** Reduce inequality: reduces corporate control over seeds, land and livelihoods ;
- **SDG 11** Make settlements safe, sustainable: safeguards Indigenous and peasant agriculture;
- **SDG 12** Sustainable consumption & production: conserves natural resources, stimulates local markets;
- **SDG 13** Combat climate change: reduces use of fossil fuels, captures carbon and improves resilience;
- **SDG 14** Conserve marine resources: reduces pollutants flowing to oceans;
- **SDG 15** Protect terrestrial ecosystems: conserves biodiversity, natural cycles and relationships; **SDG16** Peaceful societies: enhances Indigenous and peasant communities' self-determination;
- **SDG 17** Strengthen global partnership for sustainable development: empowers farmers, workers and communities, with respectful engagement by private and public sector institutions ([PAN International fact Sheet 2019](#)).

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available.*)

At national level: We suggest, that countries support the initiative proposed by the African Region to establish a global alliance on HHPs under the roof of SAICM. We also support that national representatives in the JMPM support the publication of an official HHP-list by FAO/WHO. We suggest governments to make use of all possible mechanisms (legal, voluntary, information, education etc.) to support the replacement of HHPs with non-chemical alternatives and support non-chemical alternatives as organic agriculture and Agroecology at all stages.

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

17. Lead in paint

Screening Question - Lead in paint

Lead is a multi-system toxicant for which no safe level of exposure has been identified. Exposure to lead can cause chronic and debilitating health impacts in all age groups, and children are particularly vulnerable to its neurotoxic effects. The widespread use of lead has caused extensive environmental and human exposure across the globe. One major source of exposure, particularly for children, is through “lead paint”, or paint to which lead compounds have been added as pigments, drying agents or anti-corrosives.

Among others, “Lead in Paint” was recognized as an issue of concern under the second session of the International Conference on Chemicals Management (ICCM2) in 2009. The ICCM2 also endorsed the establishment of an international partnership, the Global Alliance to Eliminate Lead Paint (GAELP), to assist in phasing out lead paint worldwide. The GAELP aims to have all countries adopt “legally binding laws, regulations, standards and/or procedures to control the production, import, sale and use of lead paints with special attention to the elimination of lead decorative paints and lead paints for other applications most likely to contribute to childhood lead exposure” and to have all paint manufacturers eliminate “the use of added lead compounds in priority areas” by 2020.

Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Nanotechnology and manufactured nanomaterials)*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Lead in paint

Lead is a multi-system toxicant for which no safe level of exposure has been identified. Exposure to lead can cause chronic and debilitating health impacts in all age groups, and children are particularly vulnerable to its neurotoxic effects. The widespread use of lead has caused extensive environmental and human exposure across the globe. One major source of exposure, particularly for children, is through “lead paint”, or paint to which lead compounds have been added as pigments, drying agents or anti-corrosives.

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Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes
- No
- Don't know

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)).*

- Legally binding
- Soft law
- Information sharing and awareness/ Voluntary initiatives
- No international actions are needed
- Other ____.

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*
- Regulatory control measures*
 - Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers))*
 - Options / guidance for economic instruments*
 - Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
 - Measures supporting science-based knowledge and research*
 - Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*
- Lack of technical capacity*
 - Lack of scientific knowledge*
 - Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
 - Difficulty with resource mobilisation*
 - Lack of economically feasible green and sustainable alternatives*
 - Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
 - None, there are no factors preventing action or progress*
 - Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Lead in Paint](#) for more information on the topic. If you select "Other", please elaborate your response).*
- Agriculture and food production*
 - Construction*
 - Electronics*
 - Energy*

- Health*
- Labour*
- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? *(Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...).*

a. Which international agendas have important linkages with this issue of concern? *(Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. *(Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)):*

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

18. Nanotechnology and manufactured nanomaterials

Screening Question - Nanotechnology and manufactured nanomaterials

While no definition has been internationally agreed upon, nanomaterials are commonly defined as materials having at least one external or internal dimension between 1 and 100 nm.

Nanotechnology, i.e. the manipulation of matter at the nanometre scale, has rapidly developed in the past few decades and led to the widespread presence of nanomaterials in consumer products and industrial applications.

Despite multiple benefits associated with the technology, concerns have emerged regarding potential risks posed by manufactured nanomaterials to human health and the environment. In light of these concerns “Nanotechnology and manufactured nanomaterials” was designated an emerging policy issue at the second session of the ICCM in 2009. Stakeholders stressed the need to close knowledge gaps; to understand, avoid, reduce and manage risks; and to review the methods used for testing and assessing safety.

Please visit the two-page factsheet on [Nanotechnology and manufactured nanomaterials](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the next issue of concern, Per- and polyfluoroalkyl substances (PFASs))*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Nanotechnology and manufactured nanomaterials

While no definition has been internationally agreed upon, nanomaterials are commonly defined as materials having at least one external or internal dimension between 1 and 100 nm.

Nanotechnology, i.e. the manipulation of matter at the nanometre scale, has rapidly developed in the past few decades and led to the widespread presence of nanomaterials in consumer products and industrial applications.

Despite multiple benefits associated with the technology, concerns have emerged regarding potential risks posed by manufactured nanomaterials to human health and the environment. In light of these concerns “Nanotechnology and manufactured nanomaterials” was designated an emerging policy issue at the second session of the ICCM in 2009. Stakeholders stressed the need to close knowledge gaps; to understand, avoid, reduce and manage risks; and to review the methods used for testing and assessing safety.

Please visit the two-page factsheet on [Nanotechnology and manufactured nanomaterials](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes*
- No*
- Don't know*

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions](#) prepared by UNEP for more information on available options).*

- Legally binding*
- Soft law*
- Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- Other _____.*

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to*

the [catalogue of international actions](#) prepared by UNEP for more information on available options).

- Regulatory control measures*
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Nanotechnology and Manufactured Nanomaterials](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*

- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available.*)

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

19. Per- and polyfluoroalkyl substances (PFASs)

Screening Question - Per- and polyfluoroalkyl substances (PFASs)

The PFAS family is composed of thousands of synthetic organic chemicals that contain at least one perfluorocarbon moiety (e.g. –CF₂–) in their molecular structures. These substances have been widely used in numerous commercial and consumer applications since the late 1940s.

Since the late 1990s and early 2000s, studies have been conducted to assess some “long-chain” PFASs. Their findings resulted in the listing of perfluorooctanesulfonic acid (PFOS) and its precursors under the Stockholm Convention in 2009. That same year, at ICCM2, SAICM stakeholders identified “managing PFASs and the transition to safer alternatives” as an issue of concern. A resolution by ICCM2 further invited intergovernmental organisations, governments and other stakeholders “to consider the development, facilitation and promotion in an open, transparent and inclusive manner of national and international stewardship programmes and regulatory approaches to reduce emissions and the content of relevant perfluorinated chemicals of concern in products and to work toward global elimination, where appropriate and technically feasible”

Please visit the two-page factsheet on [Per- and polyfluoroalkyl substances \(PFASs\) and the transition to safer alternatives](#) for more information on the topic.

1. **Entry question:** Would you like to provide responses on this issue of concern? *(If you select a "No" option, you may move to the Conclusion page)*
 - *Yes*
 - *No, I do not know enough about this issue*
 - *No, this issue is not relevant to my country or institution*
 - *No, other*
 - a. If you selected "No, other" in the previous question, please elaborate here:

Technical Questions - Per- and polyfluoroalkyl substances (PFASs)

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Please visit the two-page factsheet on [Per- and polyfluoroalkyl substances \(PFASs\) and the transition to safer alternatives](#) for more information on the topic.

Please answer the questions below that are relevant to your organization/ country/ region:

1. Do you agree with the assessment report that further international action is necessary*? *(If you select "No", you are welcome to answer the questions below or you may proceed directly to question 9)*

- Yes*
- No*
- Don't know*

a. Please provide a brief explanation for your response*. _____

2. What types of international actions should be taken? *(Multiple answers based on the catalogue of action, Please refer to the [catalogue of international actions prepared by UNEP for more information on available options](#)).*

- Legally binding*
- Soft law*
- Information sharing and awareness/ Voluntary initiatives*
- No international actions are needed*
- Other _____.*

a. Please explain your response, including examples if possible*. _____

3. Which type of approach or measure would you see as appropriate to address this issue at the international level? *(Multiple answers based on the catalogue of action, Please refer to*

the [catalogue of international actions](#) prepared by UNEP for more information on available options).

- Regulatory control measures*
- Information based and enforcement tools (such as Scientific and technical and guidelines, Guidelines and tools for enforcement, Awareness tools (including of consumers)*
- Options / guidance for economic instruments*
- Voluntary measures and approaches: (such as Guidelines, principles and strategies)*
- Measures supporting science-based knowledge and research*
- Other: _____*

a. Please explain your response, including examples if possible: _____

4. What factors prevent action/progress on addressing the issue in your country/ organization *(Multiple answers based on list below)?*

- Lack of technical capacity*
- Lack of scientific knowledge*
- Difficulties in sharing knowledge and coordinating action among different stakeholders and across sectors*
- Difficulty with resource mobilisation*
- Lack of economically feasible green and sustainable alternatives*
- Only coordinated international action can address the issue (e.g., due to transboundary effects, or prevalence of chemicals in international trade)?*
- None, there are no factors preventing action or progress*
- Other: _____*

a. Please explain your response, including examples if possible: _____

5. Can you point to existing initiatives that could be replicated or scaled up at the international level? *(Open space answer. Please share a weblink to the initiative(s) if available).*

6. Which sectors/value chains need to be closely involved in developing solutions? *(Multi-choice. Please visit the two-page factsheet on [Per- and polyfluoroalkyl substances \(PFASs\)](#) for more information on the topic. If you select "Other", please elaborate your response).*

- Agriculture and food production*
- Construction*
- Electronics*
- Energy*
- Health*
- Labour*

- Pharmaceuticals*
- Public, private, blended finance*
- Retail*
- Textiles*
- Transportation*
- Waste*
- Other: _____*

7. Which international forum or instrument would be best placed to take the lead on international action on this issue? (*Open space to elaborate. Please provide specific examples of e.g., intergovernmental bodies, multilateral agreements within or outside the chemicals and waste cluster, international instruments...*).

a. Which international agendas have important linkages with this issue of concern? (*Multiple answers based on list below. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

- Agriculture and Food*
- Biodiversity*
- Climate Change*
- Health*
- Human Rights*
- Sustainable Consumption and Production*
- World of Work*
- Other _____*

b. Please explain your response, including examples if possible. (*Open space question. For more information, please see the [UNEP assessment paper on linkages with other clusters related to chemicals and waste](#)*):

8. What priority level do you attach to this issue for international action?

- Very high*
- High,*
- Medium,*
- Low,*
- Very low*

9. Is there any priority further work you would like to suggest at the national level*? (*Open space to elaborate. Please share a weblink to the suggestion(s) if available.*)

10. Is there any priority further work you would like to suggest at the regional level*? *(Open space to elaborate. Please share a weblink to the suggestion(s) if available).*

Conclusion:

Thank you for having reached this point in the form. You are now on the last page. Below are a final set of questions covering all 19 issues of concern.

GCO-II issues:

[Arsenic](#) | [Cadmium](#) | [Glyphosate](#) | [Lead](#) | [Microplastics](#) | [Neonicotinoids](#) | [Organotins](#) | [Phthalates](#) | [Polycyclic Aromatic Hydrocarbons \(PAHs\)](#) | [Triclosan](#) | [Bisphenol A \(BPA\)](#)

List of SAICM issues:

[Chemicals in products \(CiP\)](#) | [Endocrine-disrupting chemicals \(EDCs\)](#) | [Environmentally Persistent Pharmaceutical Pollutants \(EPPPs\)](#) | [Hazardous substances within the life cycle of electrical and electronic products \(HSLEEP\)](#) | [Highly hazardous pesticides \(HHPs\)](#) | [Lead in paint](#) | [Nanotechnology and manufactured nanomaterials](#) | [Per- and polyfluoroalkyl substances \(PFASs\) and the transition to safer alternatives](#)

By clicking submit at the end of this page, it is possible to save your responses. The form for submitting written inputs will be available until **15/08/2023** COB Central European time (CET).

1. From the list of 19 issues, which issue(s) do you think is/are the most urgent? *(Multiple options from the list of 19 issues)*

- Arsenic*
- Bisphenol A (BPA)*
- Cadmium*
- Glyphosate*
- Lead*
- Microplastics*
- Neonicotinoids*
- Organotins*
- Phthalates*
- Polycyclic Aromatic Hydrocarbons (PAHs)*
- Triclosan*
- Chemicals in products (CiP)*
- Endocrine-disrupting chemicals (EDCs)*
- Environmentally Persistent Pharmaceutical Pollutants (EPPPs)*
- Hazardous substances within the life cycle of electrical and electronic products (HSLEEP)*
- Highly hazardous pesticides (HHPs)*
- Lead in paint*
- Nanotechnology and manufactured nanomaterials*
- Per- and polyfluoroalkyl substances (PFASs) and the transition to safer alternatives*

a. Please explain your response. *(Open space to elaborate).*

2. From the list of 19 issues, which issue(s) is/are the most actionable? *(Multiple options from the list of 19 issues)*

- Arsenic*
- Bisphenol A (BPA)*
- Cadmium*
- Glyphosate*
- Lead*
- Microplastics*
- Neonicotinoids*
- Organotins*
- Phthalates*
- Polycyclic Aromatic Hydrocarbons (PAHs)*
- Triclosan*
- Chemicals in products (CiP)*
- Endocrine-disrupting chemicals (EDCs)*
- Environmentally Persistent Pharmaceutical Pollutants (EPPPs)*
- Hazardous substances within the life cycle of electrical and electronic products (HSLEEP)*
- Highly hazardous pesticides (HHPs)*
- Lead in paint*
- Nanotechnology and manufactured nanomaterials*
- Per- and polyfluoroalkyl substances (PFASs) and the transition to safer alternatives*

b. Please explain your response. *(Open space to elaborate).*

3. Are there any other observations you wish to note? *(Open space to elaborate).*

Important notice!

If you click “submit” at the end of this page, your form will be saved. You can still return later to edit the form as you wish, at any time before the deadline which is **15 August 2023** Central European time (CET).

You will receive an e-mail, sent to the address you registered when starting the form. This will contain a link which you can use to return to the form to edit it. You can also share this link with a colleague, who can add extra information or change what you have already written. Indeed, we would welcome coordinated responses with views from the whole of your government or organization.

The e-mail will also have a summary of the information which you have saved.

You, or any colleague who can edit the form, will have the chance each time the form is edited to say if your submission is final, by ticking the relevant box – see below. If you tick this, that will be considered to be the final edited version of the form and future edits will not be counted. Or you can say that you wish to return to the form by ticking the other box.

Please note that all forms will be regarded as final on the closing date for the call for written inputs – 15 August COB Central European time – whether or not you have ticked the box.

All final forms will be published (apart from personal information about the person submitting the form).

Is this your final submission of the form? *(After 15 August 2023 COB Central European time, no further edits can be made to the form. After this date, all pending forms will be considered as final submissions).*

- Yes. This is the FINAL submission of written responses, no further edits will be made later
- No. This is NOT the final submission, further edits will be made later.