

The Royal Society of Chemistry's Written Statement to OEWG3, as it relates to the establishment of a science-policy panel for chemicals, waste and the prevention of pollution (SPP-CWP).

About the RSC

With about 50,000 members in over 100 countries and a knowledge provider that spans the globe, the Royal Society of Chemistry is an international not-for-profit professional body for chemical scientists, supporting and representing our members and bringing together chemical scientists from all over the world. Our members include those working in academia, large multinational companies and small to medium enterprises (SMEs), students, teachers, retirees, NGOs and government scientists and regulators. Surplus generated from membership fees and publishing revenues are used for the RSC's charitable purpose activities.

Contact

The Royal Society of Chemistry would be happy to discuss any of the issues raised in our statement in more detail. Any questions should be directed to the RSC Policy & Evidence Team at policy@rsc.org. This document was prepared by Dr Camilla Alexander-White FRSC CChem ERT (Lead Policy Adviser – International Chemicals Policy, RSC) and Professor Tom Welton OBE (the RSC's ambassador for Sustainable Chemicals Policy, Professor of Sustainable Chemistry at Imperial College, London), drawing upon discussion and inputs from the RSC SPP Engagement Group. The RSC SPP Engagement Group comprises of approximately 50 senior level scientists from the RSC membership and members from other global national chemical societies. It is led by Dr Alexander-White and Professor Welton.

This document presents the RSC positions on the following themes:

- 1. Institutional Arrangements**
- 2. Managing Conflicts of Interest**
- 3. Capacity Building**
- 4. Work Programme Prioritisation**
- 5. Facilitating open data/open science**

1. Institutional Arrangements

Referring to pre-sessional paper UNEP/SPP-CWP/OEWG.3/2 – Compilation of proposals for establishing a science-policy panel

The UNEP Major Group system works well for civil society representation and is gaining trust. [Major Group Categories | UNEP - UN Environment Programme](#)

UNEP accredited stakeholder organisations, such as the RSC, have appropriate access to mechanisms to provide input to inform the OEWG process, and have active and efficient participation as observers. We call for this to be able to continue in all aspects of the SPP.

Scientists from accredited organisations are working well together as part of the S&T Major Group. Mohamed Abdelraouf (UNEP Major Groups Lead) and Camilla Alexander-White from the RSC have provided joint leadership and facilitation for the S&T MG in relation to the SPP work, and facilitated consensus inputs from the wider community of major group representatives at OEWG1 and OEWG2.

The RSC advocates for the continued involvement of civil society representatives in all aspects of the SPP when it is established, as observers with a voice that is respected by governments in their deliberations.

Governing Body/Plenary: The RSC fully respects the decision-making powers of governments and member states and the role that the Governing Body/Plenary will perform in the SPP-CWP, in deciding its composition and work programme.

Interdisciplinary Expert Committee (IEC):

As we understand it from page 6 para 14 'An Interdisciplinary Expert Committee is established [to provide scientific advice to the Panel.]'. The RSC acknowledges the inclusion of 5 members for each of the 5 UN regional groups, as elected by the Governing Body/Plenary. Referring to page 7, para 18 and footnote 6: The current proposal in footnote 6 is '*The ad hoc open-ended working group may wish to consider electing five representatives to serve in this role, one each from health, environment, industry, trade union and public interest groups*'. This position could be improved upon to reflect the acknowledged importance of the Major Group & Stakeholders system in UN activities, the special role of science here in this panel and the formal inclusion of civil society voices.

The RSC proposes that there are 7 civil society ex officio members on the IEC, as elected via the Major Groups & Stakeholder community, and comprising:

Three Science and Technology Major Group representatives – in principle covering the areas of i) human health, ii) environment and iii) social sciences. Independent expertise in these science and technology areas is crucial for chemicals, waste and pollution prevention discussions ***to strengthen the science-policy interface***.

One Children and Youth Major Group Representative: as key next-generation stakeholders of future policies. It is their generation that is greatly affected by legacy pollution from chemicals and wastes.

Three Open Major Group representatives – i.e. three as elected from the other 7 UNEP major groups participating in the SPP – women, indigenous peoples & their communities, NGOs, business and industry, farmers, workers & trade unions, and local authorities.

Given the specific science-policy nature of the SPP, we propose that **there is sufficient justification for three science & technology seats on the IEC** to ensure coverage of the key major disciplines of human health science, environmental science and social sciences. Ideally human health and environment experts would be best coming from the natural chemical sciences (complementing any medical, engineering and social sciences disciplines on the SPP) who can share and draw upon knowledge of future directions in innovative science and technology approaches and solutions, green and sustainable chemistry opportunities and the chemicals and waste regulatory landscape.

We expect nominated government scientists to represent regions on the IEC. The work of the IEC will comprise the review of nominated scientist's CV's for working group/assessment work, providing technical advice and review of the work programme and its technical nature etc. To provide independent non-governmental insights and perspectives, that could help to balance extreme or highly political agendas, it is important that objective technical evidence and review can also inform the process. For this reason, we propose three independent S&T seats on the IEC as elected by the Civil Society Major Group process.

Policy Committee: at OEWG2 in Nairobi, a 'policy committee' was proposed by one member state. *It is the position of the RSC that a 'Policy Committee' is not necessary* for efficient functioning of the SPP.

Such a separate policy 'committee' could in principle **weaken the science-policy interface**, when the intent of the whole process is to strengthen the science-policy interface. It is possible that the work of a policy committee could constrain the topics the interdisciplinary expert committee can discuss, if the policy relevance is defined by the policy committee. The themes for discussion and work programme prioritisation should be the role of the Governing Body/Plenary, as informed by the science-policy IEC.

The 'policy committee' it appears from para 26 'Functions of the Policy Committee' would have the main contribution to prioritising the work-programme to be presented to the Governing Body. This would seem to give *an imbalanced amount of power to a separate policy committee with no involvement of civil society mentioned and minimal involvement from the IEC?*

It is the view of the RSC that a 'policy' working group/task force, subsidiary to the IEC, would suffice in considering advice on policy options etc.

We recognise that it is good and common practice to keep risk assessment and risk management separate, i.e. the science that is used to underpin risk assessment should not be unduly influenced by any policy ambitions. The science and evidence should speak to the truth of the outcome of a risk assessment. Risk management and policy actions are separate as informed by the science and risk assessment.

However, there is a practical interface between the two that makes for effective policy, where risk communication is needed between scientists performing a risk assessment/evidence review and the policymakers. Policy options can be developed separately as informed by the evidence. This can be done equally as effectively by having a risk assessment working group, evidence review groups, policy working group etc. within the IEC. The strong science-policy interface that will be the IEC can take the science and the policy as equal inputs, working together, with all of the other legitimate factors that are non-scientific to be able then make recommendations clearly from a science-policy body to the Governing Body/Plenary.

If the Member states remain convinced that a 'Policy Committee' is needed, it is imperative that civil society is sufficiently represented on this Committee, with a sufficiently representative number of ex officio seats from the Major Groups & Stakeholder community elected to it.

A separate Policy Committee will in principle weaken the concept of the SPP, lead to lengthening of processes and increase costs of delivery by having an additional committee.

Aspects considering the prioritisation of the work-programme should be delivered by the IEC where there is a combination of science and policy expertise, thereby strengthening the science-policy interface

Working Groups/Assessment Task Forces: when it comes to the technical work of the SPP, the RSC stands ready to assist national and regional governments in connecting to the best scientists.

We expect governments to nominate scientists for delivering the work of the SPP, but we advocate for professional bodies such as the RSC, as a UNEP accredited stakeholder organisation, to also be able to nominate expert scientists for the SPP.

The Concept of an SPP Science Alliance – this concept emerged at OEWG2 via discussions at the Science & Technology Major Group, as a possible means of providing a formalised mechanism for interested individual scientists anywhere in the world to provide input on the work of the SPP. This would be for scientists from any sectorial background who are not members of a UNEP accredited organisation and therefore do not have a means of interacting with the process. We are aware this concept is still under discussion, it will require funding for administration and a concept note has been prepared by members of the S&T Major Group for further discussion in Geneva.

Generally, the RSC supports the concept of having an 'SPP Science Alliance', to complement the role of UNEP accredited organisations such that any interested individual scientist can share their views into the process via a recognised and formalised mechanism.

The RSC would advocate however, that the SPP Science Alliance would not have a position on the IEC, but its reports or evidence could be fed directly to the SPP secretariat for information that could be shared with the SPP. An SPP Science Alliance network may provide another mechanism to connect with scientists who could possess relevant expertise for future technical work of the SPP. It would be important to manage inputs of individuals to the work of the Science Alliance, via a Conflicts of Interest procedure (similar to that being discussed for the work of the SPP) that a clear distinction be made between individual scientist membership of the SPP Science Alliance and representation of UNEP accredited organisations.

2. Managing Conflicts of Interest

We refer the reader to our pre-session and in-session submissions to OEWG2, Nairobi.

The Royal Society of Chemistry takes conflicts of interest very seriously, and we are pleased to see the OEWG addressing this in practical terms for the SPP ahead of its establishment.

All participants in the SPP must be asked to record and declare their interests and those of close family members or connected individuals who could benefit from the work of the SPP.

To ensure high standards in this respect, members of the RSC SPP Engagement Group, ahead of its first year of operation in March 2023, were asked to complete an RSC declaration of interest form, to ensure members had no conflicts when advising the RSC. Members are asked to declare their interests annually. As output from OEWG2, the secretariat produced a template of a proposed form Appendix B. The RSC is now trialling the SPP Conflict of Interest Form (UNEP/SPP-CWP/OEWG.3/2/Add.5) with members of the RSC SPP Engagement Group. RSC representatives will be happy to feedback, in Geneva, as to the views of the group with regards to the workability, fit-for-purposeness and comprehensiveness of the new form. It remains to be discussed and explained *how* declarations of interest will be reviewed in practice. We understand there will be a conflicts of interest committee, which we assume will be closely linked to the Interdisciplinary Expert Committee, the Bureau and Secretariat. We also expect that there will be a way of working, culture of transparency and expectation that participants declare their interests in every meeting where advice is being generated and technical reviews performed.

All interests must be declared, not just interests that individuals themselves may view as a potential or real conflict of interest. A COI committee should review whether interests present a conflict of interest with the work being performed.

As a first observation, we note that interests of family members such as spouse or civil partners are not included in the form. Benefits to spouse/civil partners should also be explicitly mentioned in section 13 of the form.

Current section 13 text states:

‘To your knowledge, could the outcome of your work for the Panel adversely affect the interests of any other persons or entities with whom you have substantial common personal, professional, financial or business interests (such as your adult children or siblings, close professional colleagues, administrative unit or department)?’

Suggest editing to:

‘Could the outcome of your work for the Panel adversely **or positively** affect the interests of any other persons or entities with whom you have substantial common personal, professional, financial or business interests (such as your **spouse/civil partner**, adult children or siblings, close professional colleagues, administrative unit or department)?’

Also, from our members’ experience with other bodies such as the OPCW, situations can arise where scientists feel they are not able to speak freely either due to cultural, government or pressures from organisations. Does UNEP have any experience or guidance to offer for when such situations arise? Developing a culture that is open to new ideas and based on freedom of expression must be developed in the SPP.

3. Capacity Building

The SPP should:

i) **Fund science-policy networks and events to develop skills and competencies in science-policy interface work.** Core funding from the SPP for ‘capacity building’ should be focused on improving the science-policy interface in nations and regions, through the establishment of new networks, events and training sessions. These should be for the sharing of knowledge and connecting people together, such that opportunities for further projects and training can be fostered.

RSC focus groups identified the need to improve scientists' ability to inform and engage with government/policymakers. This is a foreseeable need in all nation states.

1. *Scientists need training on how to engage with politicians and the policy process*, including knowledge of what data is useful and how to better communicate evidence.
 2. *Governments should provide formal structures for scientific involvement in national and regional policy processes*, such as departmental science advisory committees that can gather and evaluate technical evidence, and then present the evidence to policymakers in a meaningful way.
 3. There is also a need to *strengthen networks across scientific multi-disciplines* and across other disciplines such as the social sciences.
 4. *It is crucial that all interested scientists have access to input into the work of the new SPP* and are facilitated to participate via whichever available mechanism is best. This could be via *Civil Society Major Groups & Stakeholder processes* (for those in accredited organisations) or *via an 'SPP Science Alliance'* as mentioned above. Voluntary participation of scientists may not be a sustainable model for ensuring adequate representation and opportunities for involvement from knowledgeable scientists. It is necessary for funding to be provided for administrative and secretariat funding, but we urge the SPP to also consider the provision of grants for travel and expenses funding to attend meetings and having a process to enable due recognition for individual's participation in national research evaluation frameworks. Grants would be especially important to ensure participation of early-mid career scientists and those from less wealthy regions of the world.
 5. *The scientific community respects the knowledge that indigenous populations can bring to the SPP*, through observational and experiential learnings. Improved connections between scientists and indigenous people should be made in the regard.
 6. In the highly regulatory areas of chemicals, waste and pollution, *scientists who advise governments should develop working knowledge of relevant regulatory frameworks*, nationally, regionally and globally.
- ii) **Collate a 'capacity building' database** of the identified capacity building needs/gaps for different nations, which are expected to be different in different parts of the world. The SPP can highlight areas that require capacity building and work with developing nations to define the needs.
- iii) **Seek to connect nations and experts together**; if organisations/governments have experience to share and similar ambitions, new funded projects could meet the needs of capacity building, through research institute funding, government funding or industry funded projects. It is considered unlikely that budgets from governments alone will be available from

the SPP to deliver capital infrastructure, equipment, paid internships/placements, data sharing, in person training courses etc. The role of the SPP could be to highlight the needs while industry, professional organisations, entrepreneurs, national governments etc. can seek to fund and develop new project ideas where there are shared interests, possibly via a blind trust fund.

Work Programme Prioritisation

Referring to pre-session document UNEP/SPP-CWP/oewg.3/2/Add.3#

The RSC supports the process as described in the Add.3 document, as it reflects the prioritisation process that would be needed. It is good that all governments and all stakeholders can propose ‘issues’.

‘5. Submissions should, if possible, be accompanied by information on:
(a) The nature of the proposed issue, including a description of the issue and its associated problems and opportunities and an indication of whether it is cross-cutting or multisectoral;
(b) The relevance to the Panel’s objective and to relevant multilateral agreements, instruments and intergovernmental processes, including the rationale for why the Panel is thought to be best suited to consider the proposed issue;
(c) The urgency for action by the Panel in the light of the imminence of the problems and opportunities associated with the proposed issue;
(d) The availability of existing knowledge, data and expertise on the proposed issue.’

‘7. The Interdisciplinary Expert Committee, supported by the secretariat and additional experts where relevant, will consider and prioritize the submissions on the basis of an analysis of the **scientific, technical and policy** relevance of the submissions, taking into account the considerations outlined in paragraph 5 above.’

This text in the Add3 document indicates that ***the main role of prioritisation of proposals should rest with the Interdisciplinary Expert Committee. In the view of the RSC, there is no need for a separate policy committee to ‘contribute to prioritisation’.*** The IEC should be a strong and direct science-policy interface. The IEC could form a specific policy task group to take a deeper dive into policy aspects if needed.

The Royal Society of Chemistry's written statement to OEWG3 on Facilitating Information-sharing

The RSC is committed to an Open Access policy in relation to its publishing activities.

Details can be found at [https://www.rsc.org/journals-books-databases/open-access-](https://www.rsc.org/journals-books-databases/open-access-publishing/)

[publishing/](https://www.rsc.org/journals-books-databases/open-access-publishing/). Some general points on this approach to science publishing are provided below:

A world that works for everyone

It's our mission to help you make the world a better place. Open access is crucial to achieving this. We believe that it is the key to building a fairer, more equitable society. One where everyone can access and benefit from discoveries – including researchers, funders, policymakers, civil society and the general public.

What are the benefits of open access?



Multidisciplinary collaboration

Scientists in all disciplines and subjects can access and inspire each other



Available outside academia

Funders, policymakers and the general public all have access to new research



Boost citation potential

Readily available work can be read and cited easily by more people



High quality peer review

You can expect a simple process and fair and rigorous peer review



Keep copyright as standard

You (or your employer) retain the copyright to your article when you publish open access



Compliant with OA mandates

We make it fast and easy to meet the requirements of your funding body

Our vision for open access

This is just the beginning. Open access to scientific publications and open data (wherever possible) can lead us to a fairer society by making impactful research available to everyone. No matter who you are or where you live, you deserve to access and benefit from new discoveries. And we partner with the best people to make this a reality:



Other useful information

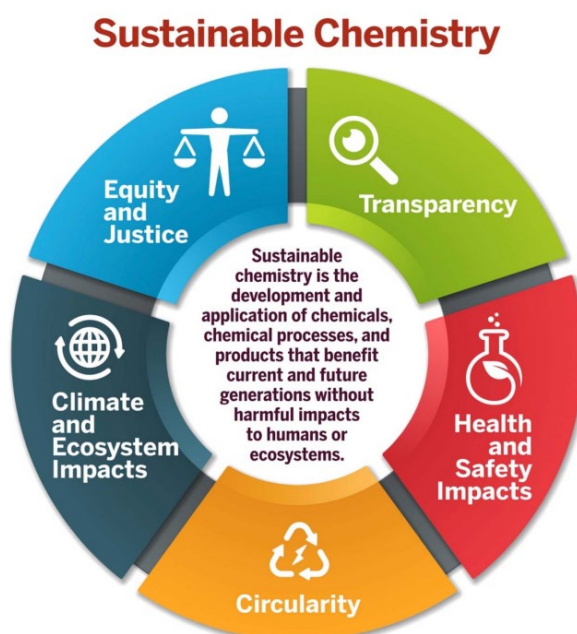
Royal Society of Chemistry Burlington Consensus events 2022 and science-policy work on chemicals, waste and pollution prevention to date

<https://www.rsc.org/policy-evidence-campaigns/chemical-waste-and-pollution/#SPP>

Peer review journal article – ‘An actionable definition and criteria for “sustainable chemistry” based on literature review and a global multisectoral stakeholder working group’

Cannon et al. (2023) RSC Sustainability, 1, 2092-2106 – **Open access publication**

<https://pubs.rsc.org/en/content/articlelanding/2023/su/d3su00217a>



Source: Lowell Center for Sustainable Production and Beyond Benign

RSC Chemicals Strategy for a Sustainable Chemicals Revolution

<https://www.rsc.org/globalassets/22-new-perspectives/sustainability/rsc-chemicals-strategy-policy-2020.pdf>

RSC Principles for the Management of Chemicals in the Environment

https://www.rsc.org/globalassets/04-campaigning-outreach/tackling-the-worlds-challenges/environment/rsc_principles_for_chemicals_in_the_environment.pdf

RSC Workshop report: When the science is uncertain, what is the role of risk-based approaches and precautionary control in chemicals policy?

<https://www.rsc.org/globalassets/22-new-perspectives/sustainability/a-chemicals-strategy-for-a-sustainable-chemicals-revolution/rsc-risk-workshop-report.pdf>

RSC Missing Elements: Racial and ethnic inequalities in the chemical sciences

<https://www.rsc.org/policy-evidence-campaigns/inclusion-diversity/surveys-reports-campaigns/racial-and-ethnic-inequalities-in-the-chemical-sciences/>

RSC A Vision for Science Culture

<https://www.rsc.org/policy-evidence-campaigns/inclusion-diversity/surveys-reports-campaigns/a-vision-for-science-culture/>