

Written Consultation Submission: Japan

Views on priorities for further work and potential further international action on issues of concern

Government of Japan

Japan appreciates UNEP for its continued and tireless efforts for the sound management of chemicals and waste and an opportunity to provide views on priorities for future work and potential further international action on issues of concern.

1. General remarks

Japan supports the goal of the sound management of chemicals established at the World Summit of Sustainable Development in 2002, aiming that “chemicals are used and produced in ways that lead to the minimization of significant adverse effects on human health and the environment”. In this regard, Japan has been strengthening the risk management of chemicals throughout their life cycle and moving research forward to enhance scientific knowledge, backed up with the National Implementation Plan of SAICM.

As referred to in the UNEA resolution 5/7, further work and international actions that the Executive Director of UNEP seeks views on issues of concern should be considered, building on existing measures and initiatives. We believe that doing so would require respecting relevant discussion at the different fora or platforms (e.g., Emerging Policy Issues (EPIs) and other issues of concern under the SAICM, activities through multi-sectors and multi-stakeholder approaches under the sound management of chemicals and waste beyond 2020, Intergovernmental Negotiating Committee on an international legally binding instrument on plastic pollution, the ad hoc open-ended working group on a science-policy panel to contribute further to the sound management of chemicals and waste and to prevent pollution), avoiding duplication of works and strengthening international cooperation.

Based on the above fundamental understanding, we would like to hereby provide a view on priorities for further work and potential further international actions on issues of concern.

2. Continuation of actions under the SAICM

Japan is of the understanding that leading agencies of EPIs and other issues of concern under the current SAICM will report its progress of activities at ICCM6 and stakeholders will discuss future actions including the need to continue addressing them as [Issues of [International] [Global] Concern / Priority Issues for International Action] under the beyond 2020 instrument. We believe that priorities for further work and potential further international action should be considered taking into account the latest progress report to be submitted by leading agencies.

Among EPIs and other issues of concern, for those where scientific knowledge is still evolving, it is expected that the upcoming science-policy panel on chemicals, waste and pollution will bring together such knowledge. Policy options can then be considered based on the outputs generated by this panel. Japan intends to commit itself to actively participating in the discussion on the design of this panel and providing appropriate scientific knowledge available in Japan once operationalized.

Among others, we are aware that works are underway to update the report “State of the Science of Endocrine Disrupting Chemicals” in cooperation with UNEP and World Health Organization as requested at the UNEA5.2. In Japan, we have been contributing to the development of standardized test methods for endocrine disruption to organisms and conducting systematic risk assessments. In 2022, we compiled our future actions on the endocrine disruption caused by chemicals as “EXTEND 2022”. We hope those efforts and scientific knowledge in each country will be properly consolidated to produce a balanced report.

Regarding programme on chemicals in products, we should prioritize coordination with discussions at the Intergovernmental Negotiating Committee on a legally binding instrument on plastic pollution aiming to exclude possible overlaps and inconsistencies.

Regarding efforts related to PFCs, several substances (or groups of substances) have already become subject to the Stockholm Convention due to their persistence, bio-accumulation, toxicity, and potential for long-range transport. Japan has implemented regulatory measures on the manufacturing, import and export of these substances. Those substances that meet the criteria for POPs should be addressed in accordance with the Stockholm Convention based on the risks of individual substances while taking into account socio-economic impacts.

3. Actions under the framework for the sound management of chemicals and waste beyond 2020 as well as other initiatives

The 11 substances (group of substances) referred to in the Assessment Report on issues of concern exhibit variations in properties such as toxicity, degradability and bioaccumulation, as well as their certainty, sources of origin, exposure pathway and levels. Furthermore, the prioritization of these substances may differ under the chemical management systems of different countries.

Under the upcoming framework for the sound management of chemicals and waste beyond 2020 to be adopted at ICCM5, while primarily taking up issues that are not covered by other frameworks in a complementary manner and striving for voluntary actions, countries will be expected to work on strengthening basic chemicals management capacities and legal frameworks, enhancing the generation of and access to information and promoting innovation throughout the supply chain.

Capacity-building and industry initiatives are also expected to be accelerated to support these efforts.

It will be necessary to share information among countries on the hazardous properties of chemicals (including 11 substances or groups of them), as well as case studies on risk assessment and management in order to appropriately assess and manage chemicals under each country's chemicals management systems. We expect the future framework to contribute to the improvement of these capabilities.

From the perspective of coordination with existing initiatives, depending on the specific substances (or groups of them) and application thereof, collaboration with the Stockholm Convention, Minamata Convention, the Global Mercury Partnership and a legally binding instrument of plastic pollution could be envisaged. There may be comprehensive issues to be addressed either as part of the EPIs and issues of concern under the SAICM or as an extension of those efforts. We believe it is crucial to discuss future actions under proper institutions with expertise while ensuring the involvement of appropriate stakeholders.

Notably, lead has been of particular concern in low- and middle-income countries due to its exposure and pollution. During the G7 Ministers' Meetings on Climate, Energy and Environment in 2022 and 2023, the G7 committed to identifying further actions as a group and advancing support for developing countries, noting with deep concern. The Japanese government is actively engaged in awareness-raising activities on the impact of lead at the thematic working group on chemicals, waste and health under the Asia-Pacific Regional Forum on Health and Environment that UNEP and WHO jointly serve as secretariat. Leveraging this platform, Japan will continue to explore opportunities to support developing countries to address lead pollution in collaboration with interested countries and organizations.

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