



Guidance Documents 2 & 3: Risk Reduction Tools for Chemicals Control *and* Enforcement of Chemicals Control Legislation

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Risk Reduction Tools for Chemicals Control

1. Introduction
2. Core principles of risk reduction
3. Prioritisation of chemicals
4. Core risk reduction tools
5. Additional risk reduction tools
6. Additional considerations

2. Core principles of risk reduction

- Clear divisions of responsibility between industry (manufacturers & importers) & government
- Precautionary principle
- Use of hazard information
- Polluter pays principle
- Extended producer responsibility
- Transparency in government actions
- Multi-stakeholder participation
- Hierarchy of controls

3. Prioritisation

3.1 Key principles

3.2 Prioritisation based on MEAs

3.3 Additional prioritisation approaches

4. Core risk reduction tools

4.1 GHS

4.2 Bans & restrictions

4.3 Information tools

- Registries & inventories
- Product registers
- Databases on chemical properties
- Ecolabeling
- Chemicals in Products program

5. Additional risk reduction tools

5.1 Authorisation/approval systems

5.2 Economic instruments

5.3 Chemicals requirements in public tenders

6. Additional considerations

6.1 Alternatives assessment & support for innovation

6.2 Choosing risk reduction tools

6.3 Addressing challenges to GHS adoption

Comments received (selected)

- Clearer distinctions among approaches for pesticides, pharmaceuticals, and industrial/consumer chemicals
- GHS – UNITAR guidance
- Add more examples of chemicals that have been prioritized for regulatory action
- Present one stepwise process for chemical prioritisation, rather than two processes
- Change order of some subsections (e.g. move authorisation/approval systems)

Enforcement of Chemicals Control Legislation

1. Introduction
2. Core principles of enforcement
3. The inspector
4. Enforcement objects
5. Conducting the inspection
6. Addressing violations

3. The Inspector

3.1 Role of the inspector

3.2 Resources & competencies needed

3.3 Access to analytical competence

3.4 Cooperation & support among
authorities

3.5 Strategies for avoiding corruption

4. Enforcement objects

- Create list of manufacturers & importers likely to be subject to the requirements. Data sources may include:
 - Hazardous waste transfer records
 - Customs control records
 - Company register created for other purposes, e.g. taxes

5. Conducting the Inspection

5.1 Steps (preparation, appointment, inspection, summary, follow-up)

5.2 Recordkeeping

5.3 Checklists

5.4 Bans & restrictions

5.5 Labelling & SDS

5.6 Packaging & storage

Bans & restrictions

- Ensure that manufacturer or importer has systems in place for ensuring its own compliance.
- Can use systems in which manufacturer certifies compliance & inspector spot-checks.
- If violation is detected:
 - Sanctions + measures to address the problem (e.g. confiscate banned chemicals, check supply chain, follow-up inspections)

Comments received (samples)

- The document seems more appropriate for countries with one central agency; it may be less useful for countries planning to use existing enforcement systems in several agencies.
- Discuss inspection both within and across borders, including issues related to smuggling
- Discuss “compliance & enforcement chain” (UN Environment Green Customs Initiative)
- Technical assistance & compliance assistance – add developing country examples

Thank you