Article 3- Chemicals of Concern

Islamic Republic of Iran

This subject should be deleted, and the reasoning is as follows:

1. **Key Findings from the UNEP Report**
   The UNEP report identifies over 13,000 chemicals associated with plastics and their production across diverse applications. Scientific data highlight that approximately 7,000 of these substances have known hazardous properties, with 3,200 exhibiting one or more concerning characteristics. Notably, around 70% of plastic waste exports originate from high-income countries, primarily sent to low-income nations in East Asia and the Pacific. In these nations, a small fraction of the imported plastic waste is recycled, while the majority ends up in landfills or littered in the environment.
2. **Regulatory Landscape on Chemicals in Plastics**
   Of the 13,000 chemicals linked to plastic products, only 980 are globally regulated through various conventions. Moreover, 4,200 chemicals are recognized as hazardous, leaving over 10,000 chemicals with little or no hazard information. This highlights the need for transparency, tracking, monitoring, and labeling of chemicals of concern.
3. **Addressing Transparency and Information Gaps**
   A comprehensive and holistic approach is essential for best practices, knowledge sharing, and capacity building to bridge the gaps between countries in addressing chemicals of concern.
4. **Comprehensive Approach to Chemicals of Concern**
   It is crucial to focus on emissions and releases of chemicals of concern from plastic products throughout their life cycles.
5. **Emphasizing Emissions and Life Cycle Management**
   The risks associated with harmful substances in plastic products are regulated by multilateral environmental agreements (MEAs), particularly the Stockholm Convention on Persistent Organic Pollutants.
6. **Regulatory Frameworks and International Agreements**
   Chemicals, like primary polymers, do not fall under the mandate of the INC. Therefore, polymers of concern should be excluded until further understanding and clarity are achieved.
7. **Position on Chemical Inclusion in Plastics**
   The use of chemical substances in plastics is governed by technical regulations and standards, ensuring that any residuals are maintained within strict maximum permissible concentrations. Thus, plastic products are deemed safe for consumption.

8. **Safety and Controlled Use of Chemicals in Production**
   Chemical substances are utilized in production processes under closed-loop conditions, avoiding direct contact with humans and the environment. They are maintained in sealed containers, tanks, reservoirs, and reactors throughout their storage and handling.
9. **Evaluation Criteria for Chemicals of Concern**
   Defining and identifying chemicals of concern in plastic products hinges on criteria established through detailed scientific evidence. The responsible governing body should formulate these criteria.
10. **Collaboration and Avoiding Duplication with MEAs**
    Criteria development should take into account the purpose of use, product types, exposure scenarios, and migration potential. Definitions and annexes must be validated through a specific scientific process agreed upon by member states. Future instruments and processes for identifying and defining chemicals of concern should avoid duplicating, contradicting, or overlapping with the mandates of existing MEAs, particularly the Basel, Rotterdam, and Stockholm Conventions.
11. **Nationally Driven Regulatory Frameworks**
    Regulating chemicals of concern should be driven by national circumstances and capabilities, ensuring that each country's unique context is considered.
12. **Risk-Based Approaches and Decision-Making**
    The list of chemicals of concern should be established based on agreed scientific criteria and strong evidence, focusing on risk assessment. A risk assessment framework will enable decision-makers to identify potential hazards, assess exposure risks, and determine impacts on health and the environment, while considering existing regulatory structures.
13. **Management of Hazardous Chemicals**
    some toxic and hazardous chemicals, such as pesticides, remain in use due to effective risk management strategies. Even hazardous substances can be safely managed with minimal exposure risks.
14. **Establishing a Science-Policy Interface**
    Support for establishing a transparent, representative science-policy interface devoid of conflicts of interest is crucial.
15. **Formation of a Scientific Committee**
    A scientific committee composed of all members of the future instrument and chaired by two co-chairs will be formed. This committee will prepare a preliminary list of chemicals of concern used in plastic products based on scientific standards.
16. **Cost Assessment and Support for Developing Countries**
    the cost of compliance and control measures should be assessed for each country. Financial and technical assistance, along with technology transfer, should be

accessible to developing countries through a dedicated fund, acknowledging the principle of common but differentiated responsibilities.

17. **Prioritizing High-Risk Chemicals**
    Each party should implement measures in line with the future instrument's regulatory frameworks, prioritizing and evaluating polymers and chemicals in plastic production that pose significant risks to human health or the environment.
18. **Restrictions and Applications of Chemicals of Concern**
    Any restrictions on chemicals of concern must ensure that these chemicals have no other viable applications.
19. **Science-backed Control Mechanisms**
    Control measures must be grounded in robust science and adopt a risk-based approach.
20. **Promoting Transparency and Compliance in Industry**
    Encouraging improvements in transparency and compliance with product safety regulations among industry players is essential.
21. **Flexibility in Compliance Measures for Developing Countries**
    Flexibility or exemptions should be allowed for developing countries facing specific needs and challenges, providing them with adequate time to comply with established measures.