

Comments received on the thought starter on criteria

Thought starter on criteria			
Author	Comment	Action	status
Norway	1. supportive of the proposed criterion c) that indicators must have the capacity to show progress to be continued 2. page 3 (criterion a)) availability of baseline data, we advise to be less strict on that historical data must be available, as in the case of completely new indicators, such data might be currently unavailable while the data may still be easily generated for a baseline. 3. (page 4) We would not set a fixed target at 20 indicators. What is important is that suitable indicators are identified for all targets in a robust and concise list of indicators. 4. Criteria document, page 2, point a) ii: "... of disease..." to be deleted so that the sentence reads "The global environmental burden attributable to chemicals and waste". 5. Criteria document, page 3, point b): "... impact of the..." to be deleted so the sentence reads "The baseline data will allow for the measurements of progress over time and will facilitate the assessment of the Framework's implementation." Proposal made to cover also outcome and activity indicators in addition to impact indicators.	1. no action (action independent of the comment to be taken on the criterion: consider correcting the criterion: instead of c) put it as g) as it was presented in the ppt to avoid confusion with the criterion c) and improve the language) 2. modify text according to the comment. 3. Change text: remove "reduce to 20 indicators" and potentially improve the language. 4. Correct text 5. Correct text	1.done 2.done 3.done 4. done 5.done
EU	1. We agree with the two criteria and the additional criterion on progress in order to refine the list of top priority indicators. 2. As regards criterion b) Availability of data to create a baseline and to assess progress, we agree that historical data are crucial in order to get a robust baseline. However, we would like to note that it may not always be possible to get historical data to establish a baseline , e.g. if an indicator deals with new aspects originating from innovation and where a history does not necessarily exist . Therefore, we suggest applying some flexibility if well justified.	1. No action 2. modify text according to the comment (same comment as Norway). 3. Correction of text will address the comment. Remove word "of disease" from ii. (this was an error in the original text). 4. Correct text as suggested 5. Add further explanation. Added footnote that refers to the factsheets where a definition of Robustness is given.	1. - 2.done 3. done 4. done 5.done 6. done 7.done 8.done 9.done 10.done

	3. (page 2 HL indicators) We understand that both indicators relate to human health. Therefore, we suggest adding at least one indicator that relates to the environment. 4. (page 2, point b) Since waste is missing, we suggest the following wording: "They are focused on outcomes related to chemicals and waste management". 5. (page 3) Please clarify the meaning of "strong data". 6. (page 3, a)) Since national priorities may be different for different countries, it is not clear how this will be reflected. Can you please clarify. 7. (page 3, b)) on "historical data must be available": We agree in principle, but there may be cases, where historical data are not available, so some flexibility may be needed. 8. (page 3, c)) on "At the international level, there should be an agency or agencies responsible to produce country-level data": It is not clear how an international agency can produce country-level data, unless this is about aggregation/processing of existing data. Otherwise, this task would rather be for an agency at national level. Can you please specify. 9. (page 3, d)) "statistical capacity": It is not clear what "statistical capacity" means. Can you please clarify. 10. (page 3, f)) "standardized methodologies": We assume that this refers to data collection and processing. Can you please clarify. 11. (page 4, c), now g)) "show": We suggest replacing this by "for showing" since it is to be seen whether it will show changes. 12. (page 4, c) now g)): "that do not evolve over time". It may be better to add "or are not expected to further evolve over time in future", since for BRS Parties the evolvement took place in the past. 13. (page 4, conclusion): add "and for measuring progress".	6. Delete the sentence to avoid confusion. 7. Rephrase according to comment/suggestion (as for previous comments). 8. Rephrase. 9. Rephrase. 10. Improve language. 11. Does not apply. The sentence was rephrased also based on other comments. 12. Consider correction. Rephrase as suggested 13. Add text as suggested 14. Rephrase	11.n/a 12.done 13. done 14.done
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	14. (page 4, conclusion): We are wondering whether indicators enable progress. They are a tool to show whether progress has been made.		
HejSupport	1. (page 2, on Robustness and page 3 in a)): The "robustness criterion" is blocking the development of indicators for missing functions in the global chemicals management, and that if addressed would help advancing work towards fulfilling the SDGs. For example sound management of chemicals (SDG 12:5) must have information on chemicals to base decisions on. Information on the presence and identity of chemicals in material and product value chains is sorely missing. This gap hinders sound management of material cycles in a resource efficient way, e.g. through circularity free from harmful chemicals (SDG 12:5). We will never fulfil 12:4 and 12:5 unless this gap is addressed. The Emerging Policy Issue (EPI) Chemicals in Products (CiP) and the Chemicals in Products Programme recognized this gap. Now both the future of the Emerging Policy Issue CiP and its associated programme is uncertain. They are at risk of falling into the cracks, as little thought or attention was given to them in connection with the intersessional process. The GFC should include an indicator for the operationalization of the intent of the CiP Programme in the form of a "transparency and traceability mechanism". This would ensure that the intent and essence of the CiP Programme continues under GFC, and at the same time would be an elevation in the ambition in the chemicals management work, which is also sorely needed. Because voluntary transparency and traceability systems, or legally binding, are scant and unharmonized, naturally there is no robust data at present. In fact, the lack of data is what the suggested indicator intends to address. The baseline is a	1. Consider modification of text or further explanation of what it is meant for robustness. Text rephrased– footnote added 2. modify text according to the comment (same comment as Norway and EU) – footnote added 3. rephrase 4. rephrase 5. no action needed	1.done 2.done 3.done 4.done 5.-

	lack of data, and progress is measured through the development of a "transparency and traceability mechanism" and its implementation. This example is illustrative of the obstacle that a strict criterion on "robustness" would create for the development of new indicators that will be necessary for some targets. (page 2 on Robustness): As it is noted in this paper, it is based on the already adopted criteria listed in Annex III. Robustness is added to the first criterion on relevance and meaningfulness. It means that this paper needs a clear explanation of the reason why it is added and how the already approved criterion (Annex III) will benefit from it. At the moment it is not clear. Moreover, it adds confusion and additional requirements which may complicate the work on indicators. 2. (page 3, a) on "Robust measures"): See the previous comment. The "robustness criterion" will be an obstacle for developing some new indicators. 3. (page 3, paragr. b) on "establish baseline): This is also an obstacle for new indicators that are intended to show that gaps in the chemicals management (at local, regional, global levels) are addressed. If there is a gap, the baseline may be lack of data, and progress measured as the filling of the gap. 4. (page 3, paragr. d)): Will be an obstacle for the development of indicators for addressing gaps in the chemicals management. See the previous comments. (page 3, paragr. d)): This paragraph also includes "potential capacity." It can be explained that such capacity could be developed and does not necessarily need to exist. In the case of transparency and traceability of chemicals in products, the capacity does exist in some countries and regions. Other		
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	countries can develop the capacity. Thus, we could suggest that potential capacity should exist or should be developed. 5. (page 3, paragr. f)): This is very important and part of this work could be carried out in the GFC implementation programme.		
IPEN	1. (page 2-3) on Robustness and baseline: “strong data is an important feature when considering an indicator. However, it is also important to consider that there might be new, relevant indicators where no or little data is currently collected, but where data collection is underway or could be initiated. indicators where a baseline is not yet available or where data for a baseline is not yet collated should also be considered”. 2. (page 3 para e)):" Before updating any indicators, there needs to be a process in place for evaluating performance of the indicators. Indicator data, including data used for performance evaluation, must either be from publicly available sources or be made publicly available to ensure transparency and credibility as mentioned under point e)." 3. (pager 3, para. f)): “data comparability through standardized methodologies under point f) also would benefit from additional elaboration since it is unclear what this means in practice”. 4. Further, the criteria should be flexible enough to allow the use of qualitative data to measure progress towards the achievement of the indicators. 5. On assessing priority indicators: “It is now also unclear how the subset of criteria listed to identify priority criteria would be able to distinguish priority criteria from non-priority or low-priority criteria... if priority criteria are deemed necessary, they could be assessed based on their impact towards meeting specific targets... it would be good to keep the option of selecting indicators where less data is available.”	1. Consider modification of text (this is in agreement with previous comments received on lack of historical data to build a baseline). 2. Consider adding some text as suggested on performance evaluation and transparency. Added “to ensure transparency”. 3. Consider additional text to clarify paragraph f). Improve language 4. N/A 5. IOMC will clarify on this.	1.done 2.done 3.done 4.n/a 5.n/a

PAN Germany and PAN UK	1. (page3 criterion b)): “the non-availability of (historic) data should not be an exclusion criterion in general (...). This is especially the case for process indicators that measure actions taken or impact indicators that measure results achieved against targets and/or objectives.” “...proposed indicators which ‘satisfy the screening criteria’. This appears to prevent important discussion and agreement on the adoption of new indicators for which data is not currently available or collected.”	1. Rephrase of the criterion to avoid the exclusion of a good new indicator for which availability of data becomes essential. This comment is in agreement with previous comments. Consider modification of text where it limits the selection of potential new indicators that have no data available yet. Added “where available”	1.done
US	1. (page 2) Second para.: move “in its Annex III” 2. (page 2) sentence “Indicators must have the following main features”: “Suggest deleting since a factsheet isn’t a feature of the indicator itself.” 3. (page 2): “Avoid the use of “must” when referring to a voluntary instrument.” 4. (page 3 and page 4) various suggestions to correct text. 5. (page 3) criterion a) “For national monitoring, the indicator should be relevant to national priorities.”: “Not applicable - the GFC won’t have indicators tailored to each country’s national priorities.” 6. (page 3) criterion c): propose to change “produce” with “provide information to support”. 7. (page 3) criterion d): “Are countries expected to conduct the analyses? In order to achieve a higher level of national reporting under the framework, data collection should be as simple as possible.” 8. (page 3) title new criteria added text: “for further consideration”	1. Correct text 2. Consider DEL as suggested 3. Consider correcting text as suggested 4. Consider changes as suggested 5. Delete sentence. 6. It is a good suggestion, but the text was already improved based on other comments. 7. n/a 8. add text to title	1.done 2.done 3.done 4.done 5.done 6.done 7.- 8.done