Stakeholder comments on new nominations of issues of concern under the Global Framework on Chemicals

UN environment programme | Global Framework on Chemicals

A. Background

1. Four nominations of issues of concern were submitted for consideration by the International Conference.

    (a) Chemicals management issues of special concern for children's health;
    (b) Harmonization of global efforts to protect human, animal and environmental health against hazardous chemicals by transitioning to New Approach Methods;
    (c) Pharmaceutical pollution and its effects on human health and the environment; and
    (d) Towards a broader approach on lead: expanding the scope beyond lead in paint.

2. In accordance with Annex I to the Global Framework on Chemicals, the Secretariat reviewed the nominations for completeness, circulated them to stakeholders and invited comments on the nominations and proposed workplans. A total of 237 responses were received and are provided in annexes I–IV to the present document. Additional written submissions received during the consultation are provided in annex V.

3. The comments are made publicly available in accordance with Annex I. Proponents may revise their nominations in response, after which the final nominations will be made available and further comments invited for consideration by the International Conference.

4. Responses came from Governments, intergovernmental and non-governmental organizations, academia, industry and other stakeholder groups.

5. Respondents expressed differing views on the four nominations. While some supported the nominations and proposed workplans, others suggested revisions or raised questions concerning their scope, implementation and relationship with existing international initiatives.

B. Chemicals management issues of special concern for children's health

6. Stakeholders widely recognized the particular vulnerability of children to hazardous chemical exposures and the potential for exposures during prenatal development, infancy, childhood and adolescence to result in lifelong and intergenerational effects. Comments highlighted the need to address cumulative and mixture exposures, differences between children and adults in exposure and biological response, and the disproportionate burdens experienced by children in vulnerable and marginalized communities.

7. Stakeholders proposed greater attention to age-disaggregated data, biomonitoring, child-specific risk assessment and indicators measuring actual reductions in exposure and improvements in health. Suggested priority sources and settings included pesticides, consumer products, food-contact materials, schools and childcare facilities, contaminated sites, informal recycling of batteries and electronic waste, agricultural work and occupational take-home exposure. Respondents also emphasized children's rights, the precautionary principle, access to information and the meaningful participation of children and youth.

8. Several stakeholders requested clearer differentiation from existing work undertaken by WHO, UNICEF and other organizations and from existing Issues of Concern relating to lead, endocrine-disrupting chemicals, highly hazardous pesticides and chemicals in products. Some supported establishing children's health as an Issue of Concern, while others considered it a cross-cutting matter that should be integrated throughout the implementation of the Framework. Suggested alternatives included an Implementation Programme, an action plan, a dedicated resolution or systematic integration of children's health across existing Issues of Concern and Implementation Programmes.

9. The complete comments on this nomination are set out in annex I.

C. Transition to New Approach Methods

10. Many stakeholders supported coordinated international action to advance New Approach Methods, noting their potential to improve the human relevance and efficiency of chemical safety assessment, increase testing capacity, support scientific innovation and reduce the use of animals.

11. Comments called for clearer and consistent terminology and for the proposal to be framed primarily around improved protection of human health and the environment. Stakeholders emphasized that the readiness and regulatory applicability of New Approach Methods vary across endpoints and contexts. They recommended acknowledging current scientific limitations, distinguishing hazard identification from quantitative risk assessment and ensuring that methods are scientifically validated, transparent and fit for their intended regulatory purpose. Several respondents also emphasized the continued importance of risk-based assessment and the integration of New Approach Method data with exposure information, epidemiology, biomonitoring and other relevant evidence.

12. A recurring issue was the relationship between the proposed work and activities already undertaken by OECD and other specialized scientific and regulatory bodies. Stakeholders requested clearer mapping of existing initiatives and cautioned against establishing parallel validation criteria, guidance or databases. Some suggested that the principal added value of the Framework could lie in global coordination, knowledge sharing, capacity-building, technology transfer and support for countries that are not well represented in existing technical processes.

13. Some stakeholders also requested clearer governance arrangements, geographical representation, responsibilities, indicators and timelines. While a number of respondents expressly supported the designation of the issue as an Issue of Concern, others questioned whether some of the proposed activities fell within that mechanism and suggested that they could be considered through an Implementation Programme or another mechanism under the Framework.

14. The complete comments on this nomination are set out in annex II.

D. Pharmaceutical pollution and its effects on human health and the environment

15. Stakeholders generally recognized pharmaceutical pollution as an issue requiring coordinated international attention because of its implications for human and animal health, water quality, ecosystems, biodiversity and antimicrobial resistance. Several respondents supported expanding the existing focus on environmentally persistent pharmaceutical pollutants to cover a broader range of pharmaceutical pollutants.

16. Stakeholders requested clearer definition of the scope and its relationship with the existing Issue of Concern on environmentally persistent pharmaceutical pollutants. Comments sought clarification on whether the nomination covers active pharmaceutical ingredients, metabolites, transformation products, manufacturing intermediates, human and veterinary medicines and releases throughout the pharmaceutical lifecycle.

17. Suggested areas for greater attention included pharmaceutical manufacturing emissions, wastewater treatment, environmental monitoring, management of unused and expired medicines, take-back and disposal systems, responsible prescribing, procurement, education, ecopharmacovigilance and measures addressing antimicrobial resistance. Stakeholders also called for stronger participation by medicines and environmental regulators, health ministries, healthcare providers, pharmacists, veterinarians, industry, generic manufacturers, patients and the water, agriculture and waste sectors.

18. Several stakeholders considered elements of the proposed workplan insufficiently defined or overly ambitious in relation to the voluntary and cooperative nature of the Framework. Comments requested further examination of the technical and regulatory feasibility of internationally agreed concentration benchmarks, mandatory ecopharmacovigilance, manufacturing standards and phase-out pathways. Respondents emphasized that measures to address pharmaceutical pollution should not compromise the

availability, affordability or accessibility of essential human and veterinary medicines, particularly in low- and middle-income countries. Greater emphasis on practical and achievable short-term actions, governance, resources and implementation responsibilities was also recommended.

19. The complete comments on this nomination are set out in annex III.

E. A broader approach to lead beyond lead in paint

20. Many stakeholders supported broadening international action on lead beyond lead in paint and recognized the need to address multiple sources and exposure pathways. Comments nevertheless emphasized the importance of maintaining and strengthening ongoing work to eliminate lead in paint.

21. Used lead-acid batteries and their informal or inadequately controlled recycling were repeatedly identified as priority sources. Other sources raised included consumer products, contaminated food and spices, cookware, cosmetics, toys, electronic waste, mining and smelting, industrial emissions, contaminated sites, water pipes and fishing equipment. Stakeholders called for clearer prioritization based on evidence of the relative contribution of different sources to exposure and suggested a phased, source-specific approach.

22. Proposed areas for strengthening the workplan included national inventories and source mapping, blood lead surveillance, environmental monitoring, laboratory capacity, enforcement, remediation, environmentally sound collection and recycling, extended producer responsibility, material traceability and protection of workers and surrounding communities. Several stakeholders also called for greater technical and financial support for low- and middle-income countries and for measurable indicators of reductions in exposure.

23. Stakeholders requested clearer explanation of how the proposed work would relate to the existing Issue of Concern on lead in paint, the Global Alliance to Eliminate Lead Paint, the Basel Convention and activities undertaken by WHO, UNICEF, ILO and other partners. Some also questioned the feasibility of the proposed timeline and noted that the roles, commitments and resources of potential lead organizations had not been confirmed. Comments further suggested aligning the stated objective on ending childhood lead poisoning with the nomination’s broader industrial, occupational, environmental and population-wide scope.

24. The complete comments on this nomination are set out in annex IV.

Annex 1: Comments received on chemicals management issues of special concern for children's health

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
1	TCHOKOUA TOU Ghislaine Doralie	Action des Femmes pour une Planète Bio (AFEPB)	Non-governmental organization	The nomination addresses an important and timely issue that aligns well with the objectives of the Global Framework on Chemicals. The proposed workplan is relevant and demonstrates a clear commitment to protecting human health and the environment. To further strengthen the nomination, it would be beneficial to include more specific indicators, measurable targets, and a detailed implementation timeline. Greater emphasis on monitoring and evaluation would also help assess progress and impact. The workplan could further highlight the importance of meaningful engagement of civil society organizations, women, youth, Indigenous Peoples, and local communities throughout implementation. In addition, stronger coordination with national authorities, the private sector, academia, and international partners would enhance sustainability and effectiveness. Finally, the nomination should encourage knowledge sharing, capacity building, and the dissemination of good practices to support implementation across countries. Particular attention should be given to gender equality and vulnerable populations, especially in addressing issues related to lead in paint and highly hazardous pesticides (HHPs). Overall, the proposed workplan provides a solid foundation and, with these refinements, has strong potential to deliver meaningful and lasting results.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Data or information; Communication or outreach; In-kind support; Other (please provide further details in the final comments section); Action des Femmes pour une Planète Bio (AFEPB) can contribute to the Global Framework on Chemicals through advocacy, community outreach, and capacity building. As a women-led organization, we bring grassroots evidence on chemical risks, promote gender-responsive solutions, and support awareness on lead, pesticides, mercury, and hazardous waste. We can also facilitate dialogue among communities, civil society, and policymakers to advance safer, inclusive chemical management.
2	Amb Jibrin Muhammad Binji	Frontier for Peace and advocate foundation Nigeria	Non-governmental organization	The nomination and workplan are clear, practical, and well aligned with the goals of promoting youth leadership, peacebuilding, and meaningful collaboration. The proposed activities reflect a strong commitment to achieving tangible results and supporting the network's shared objectives.A few minor improvements could strengthen the workplan further. Adding clear timelines, expected outcomes, and simple indicators for measuring progress would make implementation and reporting more effective. It would also be beneficial to place greater emphasis on engaging young people from grassroots and underserved communities to ensure broader representation and participation.Finally, creating more opportunities for peer learning, knowledge exchange, and sharing lessons from different contexts would add lasting value to the network.Overall, I fully support the nomination and believe the workplan provides a solid foundation for effective collaboration and meaningful impact.	Capacity-building or training; Participation in a working group or community of practice;Our organization is eager to contribute to the network by sharing practical experience, building partnerships, and supporting collaborative initiatives. We have hands-on experience in youth engagement, peacebuilding, community development, and advocacy, particularly in underserved communities across Nigeria.We are willing to participate in joint projects, peer-learning exchanges, research, and policy discussions, while also hosting community dialogues and sharing lessons from our work.

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3	Abdullahi Lawal Mohammad	Grass Root Health Organisation Of Nigeria-GHON	Non-governmental organization		Data or information;
4	Tanya Pronina, Ph.D., Ass.Prof	Research Institute of Hygiene, Toxicology, Epidemiology, Virology and Microbiology	Academia	I am the national coordinator of the European Environment and Health Process (EHPP) under the WHO partnership on risk reduction in the educational environment. My major is medicine and I PhD in childrens and adolescents health.	Participation in a working group or community of practice; Data or information; Communication or outreach;activities performed - coordinating the international activities of different laboratories and departments;coordinating and implementing international projects under the WHO, UNDP, UNEP. UNICEF; Field my scientific interests are public health, environmental and health issues, children and adolescents hygiene, hygienic diagnostics, sanitary-epidemiological well-being, prenosological diagnostics
5	UNICEF	UNICEF	Non-governmental organization		Technical expertise;
6	Joseph Sao Musa Gbassa	Environment Protection Agency Sierra Leone	Government	For a start the workplan looks very comprehensive, probably during implementation emerging issues may be captured and incorporated.	Technical expertise; Data or information; Communication or outreach; Capacity-building or training; Participation in a working group or community of practice;EPA-Sierra Leone is setting up a Center for Environmental Data and Statistics(CEDAS) and there is an interface in the platform called National Pollutant Inventory which will be storing all chemical and waste related data to inform policy formulation. Precisely the Agency will contribute by conducting research on impact of chemicals on children and provide the findings to stakeholders for decision.
7	Umidjon Ulughov	Committee on environmental protection	Government	Protecting children from the harmful impacts of chemicals and waste is a fundamental responsibility shared across governments, institutions, and communities. Young people are uniquely vulnerable: their bodies are still developing, their immune systems are more sensitive, and their long-term health can be significantly shaped by the environmental conditions in which they grow up. For this reason, supporting efforts to prevent	Data or information; Participation in a working group or community of practice;As a developing country, we can contribute by strengthening environmental monitoring, improving safe waste management, expanding public awareness

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				exposure to hazardous substances is not only a matter of environmental management but an investment in the future of society.Strengthening preventive measures—through monitoring, regulation, safe waste handling, and public awareness—helps ensure that children are not exposed to toxic pollutants that can affect their physical development, cognitive abilities, and overall well-being. These efforts also reinforce broader national goals of sustainable development, public health protection, and environmental security.By prioritizing the reduction of chemical risks and improving waste management systems, we create safer living conditions, promote healthier communities, and uphold our commitment to safeguarding the next generation. Supporting such initiatives today means ensuring that children inherit a cleaner, safer, and more resilient environment tomorrow.	programs, and sharing practical experience in reducing chemical risks. Our efforts help protect children's health and support global initiatives aimed at creating a safer and more sustainable future.
8	Ndama Assana Joseph	Ministère des affaires étrangères	Government	L'action des produits chimiques sur la santé des enfants en RCA est un défi majeur. Malgré la signature des conventions de Bâle, de Rotterdam et d'Amsterdam, la RCA n'a pas encore quitté intégré les dispositions pertinentes de ces conventions dans les normes juridiques nationales.Même la création d'une structure adéquate à sa mise en œuvre.Ce cadre arrive à un point nommé, pour rappeler aux décideurs centrafricains les engagements internationaux relatifs aux produits chimiques polluants.	Participation in a working group or community of practice;Mon pays la RCA est partie aux différentes conventions citées ci haute. A ce titre, le gouvernement centrafricain est disposé pour mettre en application toutes lesdites conventions.L'intégration des ce cadre dans les politiques publiques nationales se fera en commun accord avec votre structure.
9	Joseph Ndama Assana	Directeur général des affaires juridiques au ministère des affaires étrangères	Youth organization	Pour l'instant, il serait trop prématuré de faire des commandes. Je valide le plan de travail tel que proposé.	Participation in a working group or community of practice; La contribution de la mon pays sera significative pour le bien être des enfants.
10	Saidy Motladiile	Department of Environmental Protection	Government	Provide clear targets and objectives under one heading	Participation in a working group or community of practice;
11	Achmad Solikhin	Economic Research Institute for ASEAN and East Asia (ERIA)	Intergovernmental organization	Kindly provide indicators and baseline method for the workplan, and please also state the mechanism to monitor and evaluate your proposed issue of concern.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;ERIA is interested in supporting your organization through potential collaboration, such as conducting studies and publishing policy recommendations. We also interested to collaborate with your institution to have

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					capacity building with ASEAN and East Asia countries.
12	Andrea Jovovic	Ministry of Ecology, Sustainable Development and Northern Region Development	Government		Participation in a working group or community of practice; Communication or outreach;
13	Azeb	Ethiopian Environmental Protection Authority	Government		Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;
14	Robert Kitumaini Chikwanine	Solidarité pour la Protection des Droits de l'Enfant (SOPRODE)	Non-governmental organization	Solidarité pour la Protection des Droits de l'Enfant (SOPRODE) soutient pleinement cette proposition et considère que la santé des enfants doit devenir une priorité explicite de la mise en œuvre du Cadre mondial sur les produits chimiques.Nous recommandons toutefois que la proposition accorde une attention plus importante aux réalités des pays africains et des pays en développement, où les enfants sont souvent exposés simultanément aux pesticides hautement dangereux (HHPs), aux émissions provenant du brûlage à ciel ouvert des déchets plastiques, aux déchets électroniques, aux polluants issus des activités minières ainsi qu'aux contaminations des sols et des eaux.Nous suggérons également d'intégrer les contextes de conflits armés et de crises humanitaires, qui aggravent fortement l'exposition des enfants aux substances chimiques dangereuses. La proposition pourrait en outre renforcer les références au renforcement des capacités nationales, au biomonitoring, à la collecte de données désagrégées par âge ainsi qu'au soutien technique et financier destiné aux pays à faible et moyen revenu.Enfin, nous recommandons de reconnaître explicitement le rôle de l'agroécologie, de la réduction des pesticides hautement dangereux, du zéro déchet et de l'économie circulaire comme approches préventives contribuant à réduire durablement les expositions chimiques des enfants.	Participation in a working group or community of practice; Communication or outreach; Capacity-building or training; Data or information;Technical expertise;SOPRODE est disposée à contribuer en partageant son expérience sur les pesticides hautement dangereux, la santé environnementale des enfants, le zéro déchet, l'agroécologie et la restauration des écosystèmes en RDC. L'organisation est également prête à participer aux groupes de travail techniques, aux consultations, aux activités de renforcement des capacités et au partage d'études de cas d'Afrique centrale.
15	Susan Haffmans	Pesticide Action Network Germany (PAN Germany)	Non-governmental organization	Before the background of thousands tons of synthetic pesticides (agrochemicals) intentionally released into the environment day by day and the fact, that according to new studies as many as 490 million children and adolescents may face potential exposure to agricultural pesticides and the fact that children are specifically vulnerable we suggest to include into the nomination a reference, mentioning the need and possibility to "advance alternatives to chemicals including agroecology and IPM (integrated pest management)".For reference,	Capacity-building or training; Communication or outreach;In the context of protecting children from harmful chemicals PAN Germany can contribute toxicological and regulatory expertise and expertise on alternatives regarding pesticides and biocides and cross cutting issues like EDC and PFAS.

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				please visit UNICEF 2026 Report “Underestimated and Overlooked: The Silent Impact of Pesticides on Children. https://ceh.unicef.org/events-and-resources/knowledge-library/underestimated-and-overlooked-silent-impact-pesticides	
16	Jago Wadley	Pesticide Action Network UK (PAN UK)	Non-governmental organization		Communication or outreach; Capacity-building or training; Participation in a working group or community of practice; Data or information; In-kind support;
17	Yuliya Lobuntsova	CSD Center	Non-governmental organization	CSD Center welcomes and supports the nomination. It provides a strong basis for coordinated international action to ensure that children’s specific vulnerabilities and exposure pathways are systematically considered in chemicals and waste management.Drawing on our experience in Kazakhstan and Central Asia, we suggest giving greater attention to countries with economies in transition, where age-disaggregated exposure data, biomonitoring capacity and coordination among environmental, health, education, labour and statistical authorities often remain limited. The workplan could include the development of a minimum set of practical indicators and data requirements suitable for countries with limited monitoring capacity.We also recommend strengthening attention to exposure pathways associated with contaminated sites, industrial and mining activities, consumer products, pesticides, and the unsafe management of hazardous and electronic waste. Child-responsive considerations should be integrated into circular economy approaches, including repair, reuse and recycling, to prevent hazardous substances from being recirculated in products and secondary materials.While the workplan provides clear activities, milestones and timelines, many indicators are primarily activity- or output-based. It could be strengthened by including measurable outcomes related to monitoring coverage, integration of child-specific provisions into national policies, and the identification, reduction or control of priority exposure sources. A phased approach involving pilot countries from different regions, including Central Asia, could help test methodologies and develop practical guidance adaptable to different national contexts and levels of capacity.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;CSD Center is an environmental NGO that has worked in Kazakhstan and Central Asia since 2008, with extensive experience in chemicals and waste management, stakeholder engagement, capacity-building and awareness-raising. The organization also coordinates the CSD Youth Hub, a platform for youth engagement, consultations and environmental awareness activities.
18	TCHIGO Yovo Expédit	GREDD	Non-governmental organization	GREDD-ONG welcomes the proposed nomination and work plan, recognizing their strong alignment with the objectives of the Global Framework on Chemicals. We encourage greater consideration of the realities faced by low- and middle-income countries, where technical, regulatory, and financial capacities to address chemicals management remain limited. The work plan would also benefit from stronger	Capacity-building or training; Communication or outreach; Data or information; Technical expertise; Participation in a working group or community of practice;

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				integration of indigenous knowledge and community-based approaches, which can enhance the identification, management, and monitoring of issues of concern while ensuring local ownership and long-term sustainability. Particular attention should be given to vulnerable populations, especially children, pregnant women, informal sector workers, and rural communities who are disproportionately exposed to hazardous chemicals. Finally, we recommend strengthening knowledge-sharing, capacity-building, and monitoring mechanisms to enable civil society organizations to contribute more effectively to the implementation, evaluation, and continuous improvement of the Global Framework on Chemicals.	
19	Bashiru Malik	Community Action against Plastic Wastes (CAPws)	Non-governmental organization	I welcome the nomination and support advancing this issue under the Global Framework on Chemicals, as it addresses an important gap in protecting both human health and the environment. The proposed workplan is comprehensive and aligns well with the Framework's objectives of prevention, sound chemicals management, and multi-stakeholder collaboration.To strengthen the workplan, I recommend placing greater emphasis on capacity building, particularly for low- and middle-income countries where technical, financial, and institutional resources may be limited. The inclusion of knowledge-sharing platforms, technology transfer, and training for governments, researchers, and local communities would enhance implementation and sustainability.It would also be beneficial to include measurable indicators, clear timelines, and regular monitoring and evaluation mechanisms to track progress and assess impact. Strengthening stakeholder engagement especially with youth, Indigenous Peoples, women, academia, civil society, and the private sector will ensure that proposed actions are inclusive, evidence-based, and locally relevant.Additionally, the workplan should encourage stronger integration with existing multilateral environmental agreements and national chemicals management strategies to avoid duplication of efforts and maximize available resources. Promoting innovation, safer alternatives, and circular economy approaches where appropriate would further support long-term risk reduction.Overall, I support the nomination and believe that, with these enhancements, the workplan can make a meaningful contribution toward achieving the Global Framework on Chemicals' vision of preventing harm from chemicals and waste while promoting sustainable development.	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;
20	VI KOUADIO AMENAN	MINISTERE DE L'ENVIRONNEMENT ET DE LA	Government	La proposition énumérée est pertinente et répond à la gestion écologiquement rationnelle des produits chimiques. Il serait toutefois important d'ajouter les indicateurs de suivi et les responsabilités des principaux acteurs. Il faut également renforcer les synergies avec les	Participation in a working group or community of practice; Communication or outreach;Capacity-building or training;Le Ministère pourrait contribuer en

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		TRANSITION ECOLOGIQUE		conventions et programmes internationaux pertinents sur les produits chimiques pour plus d'efficacité. Il faut également prendre en compte les besoins des pays en développement, notamment en matière de renforcement des capacités, d'assistance technique et de mobilisation des ressources.	participant aux groupes de travail, en partageant son expérience et les bonnes pratiques nationales. Il pourrait également appuyer le renforcement des capacités par l'organisation de formations et d'ateliers, ainsi que les activités de communication et de sensibilisation en mobilisant les parties prenantes et en diffusant les orientations techniques pour promouvoir une gestion rationnelle des produits chimiques.
21	Joseph Laakso	Endocrine Society	Professional Medical and Scientific Society	We have no suggested revisions	Technical expertise; Participation in a working group or community of practice; Communication or outreach; We are not able to provide any financial support but our members have expertise on the effects of chemicals, particularly endocrine-disrupting chemicals, on children's health.
22	Emmanuel Samuel Holman	Care Best Initiative	Non-governmental organization	Care Best Initiative (CBI) appreciates the inclusive and collaborative approach reflected in the proposed nomination and workplan. We recommend ensuring that representation includes grassroots and community-based organizations working directly with vulnerable children, particularly in humanitarian and conflict-affected settings. The workplan could also place greater emphasis on strengthening local capacity through training, knowledge sharing, and technical assistance on children's environmental health and sound chemicals management. Furthermore, integrating climate resilience, safe waste management, and community awareness initiatives into the workplan would enhance its long-term impact. We encourage the development of practical monitoring and evaluation mechanisms that measure outcomes for children's health and environmental safety while promoting collaboration among governments, civil society organizations, academia, and development partners.	Participation in a working group or community of practice; Communication or outreach; Capacity-building or training;Care Best Initiative can contribute field experience from implementing health, nutrition, WASH, child protection, and community engagement programs in underserved and humanitarian settings across Nigeria. We can support evidence generation, community awareness campaigns, stakeholder engagement, policy advocacy, and capacity-building initiatives that promote healthier environments and reduce children's exposure to environmental hazards and harmful chemicals.
23	Kam Sripada	Norwegian University of Science & Technology	Academia	Children's environmental health should be included as a foundational issue for GFC. This includes both inclusion of technical aspects of children's exposure and lifelong health, as well as participation by	Technical expertise; Data or information; Participation in a working group or community of practice; Communication or

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				children and youth so that their voices are heard. GFC will have ripple effects on future generations.	outreach;Can provide research, review, and technical expertise.
24	Tamar Schlekat	Society of Environmental Toxicology and Chemistry of North America (SETAC North America)	Non-governmental organization		Technical expertise; Capacity-building or training; Participation in a working group or community of practice; Communication or outreach;
25	HE Linghui	Shenzhen Zero Waste	Non-governmental organization		Data or information; Participation in a working group or community of practice; We will continue advocating e-commerce platforms to remove the links to toxic children's products and improve their systems to avoid the presence of toxic children's products on the platforms. And we are happy to share our experiences.
26	Aishwarya Das	University Würzburg	Academia	I support the nomination and consider it highly relevant to the objectives of the Global Framework on Chemicals, particularly its focus on protecting human health and the environment throughout the chemical life cycle. I recommend that the workplan further emphasise the specific risks faced by children and other vulnerable groups, including exposure during pregnancy, at home, in schools and through contaminated food, air, water and consumer products. It would also be helpful to include clear indicators, baseline data and measurable timelines for assessing progress. The work plan could further promote cooperation among governments, civil society, youth organisations, health professionals, researchers and affected communities, while giving attention to awareness-raising, prevention, information sharing and capacity-building in developing countries. I also suggest that the nomination clarify how the proposed activities will complement existing chemicals and waste-management initiatives and avoid duplication. A strong focus on accessible public information, scientific evidence, precautionary action and meaningful participation of children and youth would strengthen the proposal.	Participation in a working group or community of practice; Data or information; Communication or outreach; Technical expertise;Our organisation can contribute through public awareness, youth engagement and communication on chemicals, health and environmental protection. We can disseminate accessible information through digital platforms, support youth consultations, assist with content creation and translation, and promote knowledge-sharing on safer chemical practices and the protection of children and vulnerable communities.
27	Ndeye Maimouna DIENE	Pesticide Action Nework (PAN) Africa	Non-governmental organization	I really appreciate stakeholders consultations activities. this step is very important because it allow to know the situation in lot of countries, to knows needs and gaps concerning chemicals and children. Establish ad hoc multistakeholder working group, education and ressources, platforms and develop research on chemicals management issues of special concern	Participation in a working group or community of practice; Capacity-building or training; Data or information; Communication or outreach; In-kind support;PAN Africa could contribute in

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				for children's health all these points are very important. That's why it's fine for me.	terms of technical support, on data information and capacity building.
28	Konstantinos C. Makris	Cyprus International Institute for Environmental and Public Health / CHILDRENFIRST Observatory	Academia	The proposed Chemicals Management Issues of Special Concern for Children's Health is both timely and relevant to the UN GFC main and wider impacts. The hundreds of chemicals and the complex routines of children call for integrated methodological approaches that can make sense out of the proposed data collection on children's chemical and other exposures. The human exposome methodological framework and its exposomics tools can provide a systematic integration of the chemical mixtures that children are exposed while accounting for social disparities and other daily routine exposures (e.g., behaviors or lifestyle, diet, etc.). Children's health and chemicals observatories can help in gathering high quality and systematic data for children health in order to better prevent and control the suite of chronic diseases that are attributable to various chemicals. We have published the results of all stakeholders' consultation in the European Journal of Pediatrics using the motto of the WHO/UNICEF health promoting school strategic agenda (HPS). To address gaps and needs of children's health and educational inequalities in schools, a qualitative study was set up to synthesize experts' views and insights on school health programs and the HPS strategy in Europe. This multi-stakeholder consultation took place during an international children's health workshop in Cyprus (October 2024). Data was collected through focus group interviews with ~ 30 experts engaged in a multistakeholder consultation between academics, governmental officials, teacher liaisons, and health professionals, including WHO experts and NGOs. A consensus was reached regarding the prerequisites and recommendations towards improving both health and educational outcomes for children; the implementation of holistic methodological frameworks, such as that of the human exposome and its exposomics tools were collectively proposed to better deploy the HPS recommendations in the school community.	Technical expertise; Data or information;Our CHILDRENFIRST Observatory in Cyprus have been collecting children health data including chemical exposures via the school setting. Our organization can provide such technical data and associated study protocols and their instruments used in our ongoing data collection on children's health and chemical exposures via the schools of the CHILDRENFIRST Observatory. We may also contribute in stakeholders' consultations with different groups.
29	Susana Fonseca	ZERO - Association for the Sustainability of the Earth System	Non-governmental organization	We have no suggestions to add.	Communication or outreach;
30	Isabelle Kolebinov	Child Rights International Network - CRIN	Non-governmental organization	A stronger human and children's rights perspective could be integrated throughout the proposal, particularly given the Global Framework on Chemicals' recognition of human rights. The reference to General Comment No. 26 could be complemented by explicit reference to the Convention on the Rights of the Child (UNCRC), including children's rights to health, development, non-discrimination, protection from	Technical expertise; Participation in a working group or community of practice; Other (please provide further details in the final comments section);CRIN is a children's rights organisation and could provide additional support for integrating

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				economic exploitation. The UN Pact for the Future could also reinforce the intergenerational and international governance dimensions.The intersectional dimension could be strengthened, particularly regarding children in marginalised communities and "sacrifice zones", who face compounded exposure through poverty, discrimination and inadequate healthcare. The concept of the "exposome" could help capture cumulative exposures across the life course and their interaction with social and biological factors.SDG references could also be broadened: hazardous chemicals can deepen poverty and inequality (SDG 1), undermine food security through soil degradation, biodiversity loss and water contamination (SDG 2), reinforce gender inequalities and affect reproductive health (SDG 5), and contribute to climate change through the chemical industry's reliance on fossil fuels (SDG 13). SDG 16 is also relevant, particularly targets 16.3, 16.7 and 16.a on access to justice, inclusive decision-making, strong institutions, access to information and public participation.The proposal could draw more on recent evidence, notably UNICEF's Underestimated and Overlooked: The Silent Impact of Pesticides on Children, including its findings on children working in agriculture and exposed to hazardous pesticides. For PFAS and EDCs, the Nordic Council of Ministers'Cost of Inaction report , as well as the Lancet Child & Adolescent Health article "EDCs: a threat to child health" provide useful references on the impacts of those substances on child health.	the children's rights perspective into the workplan.
31	Johanna Hausmann und Simona Zimmermann	Women Engage for a Common Future	Non-governmental organization	WECF is working more than 30 years on the topic of chemicals and their advers impacts on children's health. Children's health is essential for the health and well-being of future generations. We therefore strongly support ensuring that children's health and their specific vulnerability to harmful chemicals are prominently addressed in the implementation of the GFC.At the same time, it is important to maintain and strengthen the existing Issues of Concern, as the challenges they address have not yet been resolved and many of them are highly relevant to children's health.As children's health is a cross-cutting issue, comparable in this respect to gender equality, another option could be the development of a Children's Action Plan under the GFC. Similar to the Gender Action Plan, such a tool could help systematically integrate children's health, their specific vulnerabilities and exposure patterns across the implementation of the GFC, while building on and strengthening the work under existing Issues of Concern.	Communication or outreach; Participation in a working group or community of practice;With adequate funding, WECF could contribute to the development of a Children's Action Plan or to the implementation of an IoC on children's health. WECF brings extensive experience in developing, accompanying and implementing Gender Action Plans, as well as expertise on the impacts of harmful chemicals on children's health and in awareness-raising among young families and other stakeholders on how to reduce exposure (e.g. by scaling up our nesting program).
32	Ana Paula Souza	Office of the UN High Commissioner	Intergovernmental organization	OHCHR fully endorses this initiative, as submitted.	Participation in a working group or community of practice; Capacity-building or training;Technical expertise;OHCHR

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		for Human Rights (OHCHR)			has been actively involved in addressing the implications of chemicals, waste and pollution on human rights, including on children's rights to life, health, a healthy environment, participation, amongst others. OHCHR also works to advance the implementation of the UN Guiding Principles on Business and Human Rights and prevent adverse human rights impacts in business activities.
33	Tristan Saupõld	Estonian Green Movement	Non-governmental organization	This issue of concern has strong manifold worldwide, long-term impacts.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; We would be happy to help further analyse the scope of chemical impacts and lead a transition to safer alternatives, building a better future for not only children, but for adults and the whole environment .
34	Mohamed Tawfic Ahmed	Suez Canal University, Ismailia, Egypt	Academia		Participation in a working group or community of practice; Technical expertise; Capacity-building or training; Communication or outreach;Our university could be involved in running some workshop in which major stakeholders are invited. The objectives of this workshop would include:- exposing the magnitude of the problem to major stakeholder, -raising awareness about the issue at society level- suggesting positive steps that should be taken to control the problem-training and guidance support of relevant bodies involved
35	Jaimie P. Cloud	Cloud institute for sustainability education	Non-governmental organization	-	-
36	Katie Huffling	Alliance of Nurses for Healthy Environments	Non-governmental organization	The Alliance of Nurses for Healthy Environments (ANHE) is the leading global nursing organization focused on the intersection of human and planetary health. With nearly 10,000 members, ANHE champions nurses as critical to protecting children’s health from environmental harm.We	Participation in a working group or community of practice; Technical expertise; Capacity-building or training;

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				appreciate the opportunity to endorse the proposal from the Chemicals and Waste Youth Platform, “Chemicals Management Issues of Special Concern for Children’s Health,” submitted by Shannon Lisa, for adoption at the UN Global Framework on Chemicals International Conference in November 2026. Children are especially vulnerable to chemical exposure: WHO attributes 54% of the global disease burden to environmental exposures. Of an estimated 350,000+ chemicals in commercial use, few have been tested for safety in infants and children, and exposures are linked to rising rates of asthma, cancers, and neurodevelopmental disorders. More than 90% of the world’s children breathe toxic air daily, and up to 800 million have elevated blood lead levels. Because children breathe faster, eat more, and drink more per body weight than adults, they face two to five times greater exposure to environmental hazards. They are also exposed at ground level to pesticides, cleaning products, lead dust, and runoff contaminants like petroleum and paints. Emerging research continues to show harm from pesticides like glyphosate and paraquat, and prenatal PFAS exposure is linked to altered brain development in children. Despite near-universal adoption of the Convention on the Rights of the Child, there remains no dedicated international space for child-responsive chemicals management.This would advance SDG 3 targets on child mortality (3.2) and mortality from hazardous chemicals and pollution (3.9). We urge you to support “Chemicals Management Issues of Special Concern for Children’s Health” as we believe that the Global Framework on Chemicals is the best place to advance this issue.	
37	Debra Erenberg	Weaving Voices for Health & Justice	Non-governmental organization	The proposal does an excellent job of laying out a roadmap for a collaborative approach to this important issue. For various reasons, children are particularly vulnerable to environmental health threats. As such, they require specific, targeted protective action.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Other (please provide further details in the final comments section);We offer research on ways toxic chemicals in everyday products impact children's health; in the short term and over time as their bodies develop. Our work explores toxic chemicals in cleaning, beauty, menstrual/intimate care products and diapers.
38	Annika Jahnke	Helmholtz Centre for Environmental Research - UFZ	Academia	Important topic being addressed, which I hence support as is.	Technical expertise; Participation in a working group or community of practice;

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					Communication or outreach; Data or information;
39	Biruk Mekonnen Beyene	Goverment Health Center	Government	I strongly support the nomination of "Chemicals Management Issues of Special Concern for Children's Health" as an Issue of Concern under the Global Framework on Chemicals. Children face unique physiological vulnerabilities to hazardous chemical exposures, which can result in irreversible developmental, neurological, and physical health impacts. Prioritizing children's environmental health within global frameworks is critical for achieving sustainable health equity, preventing long-term public health burdens, and meeting the Sustainable Development Goals (SDGs). The proposed workplan clearly lays out actionable target areas and robust multi-stakeholder engagement models necessary to drive meaningful policy changes at both regional and global levels.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;As a public health professional and epidemiologist, I can contribute by sharing technical expertise in environmental health surveillance, epidemiological data analysis, and field-level evidence generation. I can also support capacity-building initiatives, participate in technical working groups, and assist in translating scientific evidence into targeted community health outreach and policy recommendations.
40	Abubakar Abba Umar	Garko Youth Community Development Association (GYCDA)	Youth organization	I strongly support this nomination. I believe protecting children from harmful chemical exposure deserves greater attention, particularly in rural and underserved communities in developing countries.I grew up in Garko Ward, Akko LGA, Gombe State, Nigeria, and have seen the challenges faced by families and children in my community and surrounding villages. In communities like ours, people may be exposed to chemicals through farming and pesticide use, household products, waste, food, water and other everyday activities. However, many people may not have enough information about the possible risks or safe ways to handle and store chemicals.I would encourage the workplan to give more attention to community-level awareness, prevention, research and monitoring. It would also be valuable to strengthen support for countries with limited laboratory and environmental monitoring capacity, particularly in Africa.The workplan could include clear targets for community awareness, youth engagement, research and data collection, capacity-building, and the development of practical guidance for families, schools and farmers.I also believe young people and local communities should have meaningful opportunities to contribute to implementation. Their experiences can help ensure that global actions are relevant to the realities of communities on the ground.As someone with a background in Biochemistry and community development experience, I believe this issue can make a real difference if global commitments are translated into practical action at the community level.	Capacity-building or training; Data or information; Participation in a working group or community of practice; Communication or outreach; In-kind support;GYCDA can contribute through community and youth outreach, awareness activities, local information sharing, volunteer mobilization and participation in relevant working groups or communities of practice. We can help communicate practical information on chemical safety to young people, families and underserved communities, particularly in rural areas.

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41	Teresa McGrath	Habitable	Non-governmental organization		Technical expertise; Data or information; Participation in a working group or community of practice;we can provide access to Pharos - a chemical hazard database with global hazard data on over 200,000 chemicals . We can provide a detailed assessment of chemicals children are exposed to as a result of plastics and materials production, particularly building materials.
42	Hiromitsu Takaoka	Japan Soap & Detergent Association	Private sector	Vulnerable consumers are not limited to children. While there is value in focusing on children as the next generation, in that case it would be preferable to focus on education for chemicals management. WHO and UNICEF are already providing technical support and raising awareness on children's environmental health. A clear division of roles is needed so that the implementation of sound chemicals management remains a core objective of the GFC. Regarding the acceleration of cohort studies that provide a basis for understanding risks to children, I propose adding the number of countries conducting such studies as an indicator under Target B7.	
43	Dileep Kumar A D	Pesticide Action Network India	Non-governmental organization		Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Data or information; Communication or outreach;
44	Rico Euripidou	groundWork, Friends of the Earth South Africa	Non-governmental organization	The GFC workplan on children's health must be structured to answer whether GFC interventions (to address targets) are actually reducing children's exposure to hazardous chemicals, across the places and products where children live, learn, eat and play, and is children's health improving as a result (across indicators).	Capacity-building or training; Participation in a working group or community of practice; Communication or outreach;
45	Emmanuel Kiyaka	Green Interventions for Sustainable Towns (GIST) Kenya	Non-governmental organization	GIST-Kenya supports the nomination and considers it highly relevant to the Global Framework on Chemicals (GFC), particularly its focus on children's disproportionate vulnerability to chemical exposures, prevention, intergenerational impacts and gaps in child-specific data.We recommend strengthening the workplan with clear targets, indicators, responsible stakeholders and timelines, including measures to improve age-disaggregated data, biomonitoring and risk assessment in developing countries and countries with limited capacity.The initiative should ensure meaningful participation of children and youth, not only as vulnerable groups but as stakeholders in policy development, education, communication and implementation. Capacity-building, knowledge	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;GIST-Kenya can contribute youth and community perspectives, stakeholder outreach, awareness and capacity-building, as well as relevant information from Kenya and the African context. We are also willing to

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				exchange and locally generated evidence should also be prioritized.The proposed work should complement existing initiatives on lead, endocrine-disrupting chemicals, chemicals in products and children's environmental health, while providing a clear coordinating platform for broader chemicals-management issues affecting children.GIST-Kenya is interested in contributing technical expertise, data and information, stakeholder engagement, capacity-building, communication and outreach, and participation in a working group or community of practice.	participate in a working group or community of practice.
46	Tonia Masson	Society of Toxicology	Association	The Society of Toxicology (SOT) is a professional association with a mission of creating a safer and healthier world by advancing the science and increasing the impact of toxicology. SOT members represent all sectors of toxicological work and reside in countries around the globe. SOT supports "Chemicals Management Issues of Special Concern for Children's Health" and recognizes children's unique vulnerabilities to chemical exposures and the importance of incorporating these vulnerabilities into chemical risk assessment and management decisions. This is a timely and important proposal that addresses a significant gap in global chemicals management.	Other (please provide further details in the final comments section);
47	Issa Nelson Nicas	Tanzania Education Co-operation (TEC.Org)	Non-governmental organization	Tanzania Education Co-operation (TEC) supports recognition of "Chemicals Management Issues of Special Concern for Children's Health" under the Global Framework on Chemicals. Evidence demonstrates the urgency of the issue. A 2020 UNICEF Pure Earth analysis estimated that one in three children and adolescents globally up to 800 million people under age 20 had blood lead levels at or above 5 µg/dL. WHO reports that young children may absorb four to five times as much lead as adults from an ingested dose and that no level of lead exposure is known to be without harmful effects.Tanzanian evidence, although limited, demonstrates surveillance gaps. A 12-month study across 10 Tanzanian healthcare facilities identified 53 acute pesticide-poisoning cases among children under 18; 49.1% were accidental and 30.2% involved self-harm. These historical findings from selected facilities are not national estimates, but they demonstrate the need for current, representative exposure data and stronger surveillance.TEC recommends country baselines, time-bound targets, designated lead organizations and indicators disaggregated by age, sex, disability, location and socioeconomic status. Indicators should measure exposure reduction, implementation of child-protective policies, safer schools and communities, poisoning surveillance and referral, access to understandable risk information, and meaningful child and youth participation.The workplan should clarify coordination with WHO, UNICEF, UNEP, ILO and relevant conventions while prioritizing low-	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;Tanzania Education Co-operation (TEC.Org) will contribute Tanzanian expertise through stakeholder engagement, non-clinical data collection, English and Kiswahili risk communication, training, outreach and working groups. Drawing on our waste-management, environmental education and youth programmes, TEC will provide staff time, coordination and community mobilization. Work involving children will follow safeguarding and responsible data practices

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				and middle-income countries facing unsafe pesticide use, informal battery and e-waste recycling, open burning and inadequate waste management. Funded country pilots, ethical and comparable data systems, periodic reviews and inclusive stakeholder participation would translate global commitments into measurable prevention and health outcomes.	
48	Shannon Conrey	Case Western Reserve University	Academia	The nomination mentions that child exposures may lead to inter-generational exposures. With this in mind, understanding how maternal exposures effect infant exposure levels, as well as the long-term storage and transfer of exposures should be addressed.	Technical expertise;This is a critically important focus-children are not 'little adults' and toxic exposures during periods of rapid growth and development need to be better understood and solutions/mitigation efforts prioritized.
49	Kohjiro Hashizume	Japan Chemical Industry Association	Private sector	We support this proposal. Consideration of vulnerable populations is a critically important aspect of chemical safety.However, we hope that the following points will be taken into account as this proposal moves forward.We believe it is necessary to further clarify the role and scope of this proposal. It is essential to avoid overlapping with initiatives addressing other issues of concern and to establish a complementary relationship that generates synergies through the division of roles and collaboration with other organizations (such as WHO and UNICEF).Furthermore, discussions must be based on scientific evidence, and it is important to ensure that risk-based initiatives are promoted from a multifaceted perspective—not only through hazard-based assessments but also by evaluating impacts on growth and development, as well as actual exposure patterns. We also believe it is necessary to take into account the relationship with ISP-CWP.	Participation in a working group or community of practice;
50	Tanya Pronina	Research Institute of Hygiene, Toxicology, Epidemiology, Virology and Microbiology	Academia		Participation in a working group or community of practice; Capacity-building or training;
51	Saidy Motladiile	Department of Environmental protection	Government		Technical expertise; Capacity-building or training; Communication or outreach; In-kind support;
52	Emilian Manishimwe	Echoes of children voices Uganda	Non-governmental organization	None	Capacity-building or training; Participation in a working group or community of practice; Nill

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53	Anna Isabel Becker	International Sustainable Chemistry Collaborative Centre (ISC3)	Multi-Stakeholder Actor	ISC3 welcomes the nomination and recognizes the importance of systematically addressing children's particular vulnerabilities to chemical exposures within the Global Framework on Chemicals. The proposal provides a strong rationale for coordinated international action and is well aligned with the GFC's emphasis on prevention, vulnerable and at-risk groups, intergenerational equity and improved availability of age-disaggregated data. We particularly welcome the links made to Green and Sustainable Chemistry, safer alternatives and chemical innovation. Further implementation could strengthen this preventive perspective by considering children's particular vulnerabilities when designing and developing chemicals, materials and products.Given the broad and cross-cutting scope of the proposed workplan, we encourage continued attention to complementarity with existing GFC Issues of Concern, Implementation Programmes and relevant activities of WHO, UNICEF, IOMC organisations and other initiatives. Building on existing structures, knowledge platforms and implementation mechanisms wherever possible could help avoid duplication and support efficient use of resources.As the workplan develops, further prioritization and sequencing of activities, clarification of institutional responsibilities and confirmation of implementation partners could help translate the ambitious scope into feasible and measurable action, particularly in countries with limited chemicals-management capacities.	Capacity-building or training; Communication or outreach; In-kind support;ISC3 could potentially contribute through its expertise and networks in Green and Sustainable Chemistry, capacity building, innovation and multistakeholder engagement, including by sharing relevant knowledge and good practices and contributing to stakeholder dialogues. Any specific contribution would be subject to further discussion and alignment with ISC3's mandate, priorities and available capacities.
54	Edith Labeja Atim	Resilient40	Private sector		Communication or outreach; Participation in a working group or community of practice; Capacity-building or training;
55	Wilson Tejeda	Ministry of Environment and Natural Resources	Government		Data or information; In-kind support;
56	Liz Hurtado	Moms Clean Air Force	Non-governmental organization		Communication or outreach; Moms Clean Air Force may be able to support this initiative through communications and outreach, including sharing relevant information with our networks and helping raise awareness of efforts to protect children from harmful chemical exposures.
57	Dr Jeffrey Bonnici	Malta National Poisons Centre	Government		Capacity-building or training; Communication or outreach; Technical

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					expertise; Participation in a working group or community of practice;
58	Russian Federation	Ministry of Industry and Trade of the Russian Federation	Government	The nomination addresses an important and insufficiently coordinated issue. Children-specific aspects are not systematically reflected in existing chemical hazard and risk-assessment approaches, while product-specific regulation cannot address all relevant exposure pathways. A dedicated working group could therefore be supported as a useful first step to identify gaps, coordinate expertise and develop practical recommendations.At the same time, the nomination acknowledges substantial existing work by WHO and UNICEF on children's environmental health. The proposed working group should build on these mechanisms, with a clearly defined mandate, composition and division of responsibilities to avoid duplication. The workplan should also specify how stakeholders will be identified and selected, ensuring appropriate representation of governments, regulators, scientific bodies, industry, civil society and countries with different levels of capacity.The workplan covers age-disaggregated data, guidance and training, prioritisation, testing and risk assessment, research and monitoring, national policy support and corporate action. However, it should explain more clearly how these outputs would translate into sustained implementation within national chemicals-management systems and what specific added value the GFC would provide beyond existing mechanisms. References to the Intergovernmental Science-Policy Panel on Chemicals, Waste and Pollution should be removed at this stage or made explicitly subject to future decisions of its Plenary, including topic selection and preparation of deliverables.	Other (please provide further details in the final comments section);The workplan should establish a clear institutional coordination model and a credible pathway from knowledge-sharing to national implementation. The proposed ad hoc multistakeholder working group should have transparent criteria for composition, representation and participation. Overall, the initiative can be supported in principle, provided that duplication with existing WHO/UNICEF mechanisms is avoided.
59	Cebsile Dlamini	Eswatini Environment Authority	Government	blood surveillance of chemicals in children studies	Data or information; Participation in a working group or community of practice; Communication or outreach; In-kind support;none
60	Mduduzi Nicks Dlamini on behalf of Isaac Gcina Dladla	Eswatini Environment Authority	Government	The proposal and its accompanying workplan should accurately reflect the unique socioeconomic realities and environmental health challenges as outlined herewith. Adding specific action items addressing pesticide drift and proximity exposure for children living near agricultural communities. Many families in developing countries reside directly adjacent to farms, exposing infants and young children heavily via local dust and shared water sources. The workplan should explicitly outline risk-mitigation and monitoring frameworks for children engaged in agricultural work in view of the fact that agriculture accounts for a massive portion of child labour therefore localized protections against	Data or information; Participation in a working group or community of practice; Communication or outreach; In-kind support; Capacity-building or training;As an environmental regulatory body overseeing toxic waste, licensing, and treaties, we offer data-driven contributions to pediatric safety. We can integrate child-health risks into environmental assessments and provide tracking data on

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				direct spraying and crop handling are highly relevant. The workplan should focus more on heavy metals and plasticizers leaching from toys and electronic waste since developing nations face rising volumes of unmanaged informal electronic waste, which directly impacts children playing or scavenging near disposal sites. The workplan should also cover advocacy for financial and technical resources to conduct child-focused biomonitoring. Access to testing tools is vital to gauge actual blood lead levels and pesticide body burdens at local levels. It is also suggested to add activities focused on training local healthcare workers to recognize early clinical signs of chronic pediatric chemical toxicity.	waste streams impacting children, such as e-waste, microplastics, and medical waste. Via the Eswatini Environment Fund, we will share proven models for funding grassroots initiatives that reduce pesticide exposure and promote localized youth waste segregation
61	Julia Boos	Swiss Centre for Applied Human Toxicology (SCAHT)	Academia	The specific added value could be strengthened by more explicitly highlighting the gap the IoC would fill to bring existing efforts together across the full chemicals-management cycle (identification, prioritization, testing, assessment and monitoring to risk-management and policy implementation)The scientific rationale could be strengthened. Children undergo dynamic and stage-specific changes in physiology, toxicokinetics and toxicodynamics throughout development, creating specific windows of susceptibility during which chemical perturbation may lead to effects that strongly differ from adults. It may also be interesting to consider the differences in external exposure and internal dose: the same external exposure does not necessarily result in the same internal concentration of a chemical or its metabolites due to different absorption, distribution, metabolization and excretion between adults and children. More explicitly describing these biological and exposure-related differences would strengthen the rationale and emphasize that children are not scaled-down versions of adult exposure and biology.New Approach Methodologies (NAMs) could be explicitly incorporated into the proposed activities on chemical safety testing. NAMs will be necessary to increase the number of tested chemicals while providing information that is relevant to human biology (increased testing capacity and throughput, providing mechanistic information, assessment of specific developmental stages and windows of vulnerability). The workplan activity on advancing testing, hazard and risk assessment approaches would be a suitable place to include NAMs. The associated milestone and indicator of progress are currently quite broad. The milestone could be made more specific by clarifying what level of progress is expected, eg, it could distinguish between identifying/prioritizing relevant approaches and further developing or piloting selected ones. The indicator could likewise be more focused.	Participation in a working group or community of practice;SCAHT coordinates the ISTNET-DART stakeholder network, which brings together regulators, academia and industry to advance human-relevant NAMs for developmental and reproductive toxicity, including life-stage-specific assessment. SCAHT also has expertise in supporting NAM development toward validation and regulatory acceptance. Through this combination of scientific, regulatory and stakeholder-network expertise, SCAHT could contribute to relevant IoC activities.

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62	Leila Dirie	Ministry of Environment & Climate Change	Government	As Somalia's national focal point for the Basel, Rotterdam, and Stockholm Conventions and the Global Framework on Chemicals, we welcome this nomination and see strong relevance to our national context. Somalia has a young population with limited chemicals monitoring with data and capacity gaps.The nomination rightly notes that child health/exposure impacts are likely most underestimated in countries without dedicated biomonitoring capacity. Somalia is such a country. We would welcome the workplan's capacity-building activities and developing chemicals management systems.Since Somalia's limited institutional capacity to engage multiple parallel international processes, a single coordinating platform under GFC (rather than separate WHO/UNICEF-led tracks) would ease our ability to participate meaningfully.Additionally, capacity-building activities would help us plan participation and identify funding opportunities in advance.We are interested in contributing technical expertise and data from our national chemicals governance work, and would like to nominate a youth representative to represent the platform.	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;We are interested in nominating a youth representative to the Chemicals and Waste Youth Platform, supporting the GFC's broader objective of meaningful youth engagement in chemicals management.Given our current capacity constraints, our contribution at this stage would be strongest through active participation in consultations and the working group process. We would welcome opportunities to access the capacity-building and knowledge-sharing resources this IoC proposes to develop.
63	Carolina Banaru	Ministry of Environment	Government		Participation in a working group or community of practice; Capacity-building or training;
64	Dorota Napierska	Zero Waste Europe	Non-governmental organization	We strongly support this initiative as Zero Waste Europe often highlights the need for better policies to protect vulnerable groups, especially children, from exposure to hazardous substances, as well as the urgent need to take action on this issue.	Communication or outreach; Data or information;
65	Maria Ines Esquivel	Ministry of health	Government	Panama welcomes this nomination and supports its advancement to IC-1. The proposal is well-grounded scientifically, clearly aligned with the Framework's vision and principles on vulnerable groups and intergenerational justice, and appropriately distinguishes itself from existing IoCs (CiP, EDCs, LiP) without duplicating their scope. We suggest the following refinements ahead of IC-1: Ecotoxicological and biodiversity data: The health-impact evidence is strong, but references to biodiversity, ecosystems and non-human developmental effects remain largely illustrative. We recommend the proponents include, or explicitly flag as a gap to be addressed, available ecotoxicological and environmental fate data alongside the human health evidence. Workplan indicators and timeline: Current milestones focus on process indicators. We recommend adding indicative outcome-oriented targets and extending timeline detail beyond Q4 2027 into the 2027–2029 period.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training;

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				Leadership structure: Co-leads are not yet confirmed. We encourage proponents to identify at least one confirmed government or intergovernmental co-lead before IC-1. National relevance and age-disaggregated data: The nomination rightly notes that developing countries without dedicated child biomonitoring capacity likely face the most underestimated child illness/death burden from chemical exposure — a gap Panama recognizes in its own toxicological surveillance work (CIIMET). At the same time, Panama's social policy agencies are actively building age-disaggregated data systems for social monitoring purposes. This IoC offers a natural opportunity to extend that existing data infrastructure toward chemical exposure surveillance, and Panama would welcome technical cooperation in this area. We reiterate our support for this IoC as a needed institutional home for coordinated, child-responsive chemicals governance.	
66	Greg Carreau / Miranda MacPherson	Health Canada / Government of Canada	Government	Canada welcomes the focus on protecting children from harmful chemical exposures and recognizes the importance of strengthening the evidence base on children's environmental health. The proposed initiative complements ongoing efforts by international organizations and governments to better understand vulnerabilities, exposures, and potential health impacts associated with chemicals.Canada encourages the initiative to clearly articulate its added value relative to existing international activities (WHO, UNICEF, OECD) and to identify opportunities for coordination with relevant organizations and frameworks working on chemicals management, children's health, and environmental health. Consideration could also be given to ensuring broad geographic representation, including participation from low- and middle-income countries, Indigenous Peoples, youth, academia, public health experts, and other relevant stakeholders.Canada would welcome a workplan that includes clear objectives, deliverables, timelines, and governance arrangements, as well as mechanisms to avoid duplication and maximize the use of existing scientific information and risk assessment activities. The initiative may also benefit from identifying opportunities to promote knowledge sharing, capacity building, and the exchange of best practices among participating organizations.Overall, Canada supports efforts that advance science-based approaches to reducing harmful chemical exposures and improving health outcomes for children.Revisions:Canada notes that monitoring chemical exposures in young children is an evolving area of science which may benefit from multi-stakeholder approaches and harmonization of biomonitoring methods/study designs.Table 1 Comparison Recommended edits:HHPs:	Technical expertise; Participation in a working group or community of practice;Canada has various policy, regulatory, and research expertise on this topic and may be in a position to share with interested parties. Canada has funded work previously with the OECD to develop methodologies on children's exposure assessment and has also published public opinion survey data on children's personal care product usage with the Netherlands which may be informative.Canada may be in a position to provide baseline information on national initiatives and provide review on materials.

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				Resolution V/11 which endorsed the formation of a Global Alliance on HHPs (GAHHPs)… despite widespread recognition that children are at particular risk from exposure to highly hazardous pesticides.	
67	Cyrus Rangan	California Office of Environmental Health Hazard Assessment	Government	I don't know if you might already be connected with the following, but I'll place the info here just in case: You may find additional benefit in partnering with the American College of Medical Toxicology, which is the professional association that serves Medical Toxicologists. ACMT has a strong partnership with Pediatric Environmental Health Specialty Units, which is a network of experts in children and environmental health. Here is a link that you may find useful. https://education.acmt.net/pehsu	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Data or information; Communication or outreach; In-kind support;You can find more information about OEHHA here: https://oehha.ca.gov/about/what-we-doYou can find more information about the Center that I direct within OEHHA here, The Center for Children's Environmental Health: https://oehha.ca.gov/risk-assessment/childrens-environmental-health-center
68	Nahir Matus	Department of The Environment	Government	In full support.	Data or information; Participation in a working group or community of practice; Communication or outreach; In-kind support; None; all relates to the section 17
69	Emmanuel Odjam-Akumatey	Ecological Restorations	Non-governmental organization		Participation in a working group or community of practice; Communication or outreach; Capacity-building or training;
70	JUBA SAKALA	ZAMBIA CONSUMER ASSOCIATION	Non-governmental organization	ZACA welcomes the nomination and proposed workplan and considers the initiative timely and highly relevant to Zambia, particularly given the vulnerability of children to harmful chemical exposures. We recommend that the workplan place stronger emphasis on the realities of low- and middle-income countries, including limited capacity for chemical testing, monitoring, enforcement and public awareness.ZACA further recommends that the workplan explicitly strengthen the role of consumer organizations and civil society in chemicals management. Consumers are directly exposed to chemicals through food, toys, cosmetics, household products, pesticides, paints, plastics and other everyday products, yet their perspectives are often insufficiently represented in policy and regulatory processes.We suggest incorporating activities focused on consumer awareness and education, identification of chemical risks in children's products, promotion of safer alternatives, improved product labelling and information disclosure, and mechanisms for consumers and	Communication or outreach;ZACA can contribute expertise in consumer advocacy, public awareness, policy engagement and stakeholder coordination. We can support sensitization of parents, schools and communities on chemical risks, advocate for safer products, stronger standards, effective labelling and enforcement, and promote child-responsive chemicals management. ZACA can also contribute its experience on food safety, mercury reduction, hazardous substances and consumer protection.

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
				communities to report suspected chemical-related risks.The workplan should also promote stronger collaboration among health, environment, education, standards, consumer protection and other relevant institutions, while supporting evidence generation and knowledge sharing on children's exposure to hazardous chemicals.For Zambia, ZACA would particularly welcome attention to priority concerns such as lead, mercury, pesticides, hazardous chemicals in consumer products, food contaminants and chemical exposure in schools and communities. We also recommend measurable indicators to track progress in reducing children's exposure and improving access to safer products.Overall, ZACA supports the nomination and workplan and is willing to contribute its consumer advocacy, awareness-raising and stakeholder engagement experience to advance child-responsive chemicals management.	
71	Petrina Nghidengwa	Ministry of Justice and Labour Relations	Government	None	Participation in a working group or community of practice; My organization will contribute by participating in a working group or community of practice
72	Erica Phipps	Canadian Partnership for Children's Health and Environment	Non-governmental organization		Participation in a working group or community of practice; Communication or outreach; Technical expertise;
73	Jorge Alejandro Solis Portillo	Academia Joven de Ciencias Médicas, Físicas y Naturales de Guatemala	Youth organization		Technical expertise; Capacity-building or training; Communication or outreach; the Academy can build local capacity by training healthcare professionals and researchers, translating scientific evidence into policy briefs to guide national regulations, and leading public awareness campaigns to educate communities.
74	Alessandra Cristina Azevedo	Associacao Civil Projeto Hospitais Saudaveis	Non-governmental organization	We support the proposed Issue of Concern and its cross-cutting, lifecycle-based approach to protecting children from harmful chemical exposures. We also see potential for synergies with the Healthcare Sector Programme (HSP), particularly in translating child-responsive chemicals management into practical, measurable action.We suggest strengthening the nomination and workplan by:• Explicitly addressing transparency, traceability and disclosure of chemicals in products and supply chains, enabling informed decision-making and safer alternatives. Also as an Outcome.• Including policy and institutional strengthening as a specific	Communication or outreach; Participation in a working group or community of practice; Other (please provide further details in the final comments section);PHS/HCWH brings expertise and networks in healthcare sustainability, sustainable procurement and chemicals management. Through the HSP, we see potential to contribute a healthcare-sector

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				area of action, including integration of child-responsive chemicals management into policies, procurement frameworks and institutional practices. Also as an Outcome.• Highlighting sustainable procurement and safer substitution as practical mechanisms for implementation, including approaches to prevent regrettable substitution.• Further clarifying opportunities for collaboration with relevant Implementation Programmes and Thematic Workstreams, building on the roles already identified in the workplan, including joint activities and knowledge exchange.• Recognizing healthcare as a potential implementation and demonstration sector, providing practical examples, evidence and replicable approaches for integrating child-responsive chemicals management into product selection, procurement and supply-chain practices.	perspective, including on chemicals in healthcare products, safer alternatives, transparency and procurement. We welcome opportunities for knowledge exchange and coordination with the IoC, relevant GFC Implementation Programmes and Thematic Workstreams, as the HSP develops.
75	Naji KODEIH	IndyACT	Non-governmental organization	Children are the most sensitive to the harmful effects of chemicals and waste. They are the most vulnerable due to their stage of development and their fragile physiology. They need protection from institutions, legislation, and international conventions. The GFC is an effective tool in protecting children from the negative effects of chemicals and waste.	Technical expertise; Participation in a working group or community of practice; Data or information; Capacity-building or training; Communication or outreach; IndyACT - Lebanon is a non-governmental organization active at the national, regional, and global levels. It works in the areas of human rights, climate change, and combating pollution from chemicals and hazardous waste. Child protection is a priority area of activity, and our Hazardous Chemicals and Hazardous Waste Management Department, which serves as the focal point for the Global Framework on Chemicals (GFC), is responsible for managing this aspect of our work.
76	Gabriel Sigmund	Wageningen University	Academia		Technical expertise; Participation in a working group or community of practice;
77	Henry Rowlands	Institute for Preventive Health	Non-governmental organization		Technical expertise; Data or information; Communication or outreach; Capacity-building or training; Participation in a working group or community of practice;
78	Eruaga Jackson	World Vision International	Non-governmental organization	No further comments	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;

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					No further comments
79	Elina	Center for Environmental Risk Management	non-profit organization	Provide for an inventory and mapping of potentially hazardous facilities and areas associated with the storage, use, and disposal of chemicals and waste.Include measures for environmental monitoring and chemical risk assessment in areas with increased potential exposure. Provide for the development of practical recommendations to reduce the exposure of children and the general public to hazardous chemicals.Include informational and educational activities for local authorities, educational institutions, and the general public.If necessary, identify pilot areas for chemical and environmental risk assessments and the subsequent development of mitigation measures.	Participation in a working group or community of practice;Given the profile of the activities of the Center for Environmental Risk Management under the Ministry of Natural Resources, Ecology and Technical Supervision of the Kyrgyz Republic, its potential contribution to the project "Problems of Chemical Management Causing Particular Concern for Children's Health" should be determined through environmental risks, monitoring, prevention of exposure to hazardous chemicals and interdepartmental coordination.
80	Piyush Mohapatra	Toxics Link	Non-governmental organization		Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Technical expertise;
81	Etienne Cabane	Food Packaging Forum Foundation	Non-profit scientific foundation	One area that could be considered further would be the explicit recognition of food-contact materials and food packaging as relevant sources of chemical exposure for children. It may also be valuable to further emphasize the importance of chemical transparency and the avoidance of regrettable substitutions when promoting safer alternatives.	Technical expertise; Capacity-building or training; Participation in a working group or community of practice; Data or information; Communication or outreach;FPF could contribute by providing independent, science-based expertise on food packaging chemicals, convening diverse stakeholders, and translating evidence into practical tools and recommendations that support safer and more sustainable packaging solutions.
82	Karen E. Makuch	Imperial College London	Academia		Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;
83	Hanna-Andrea Rother	Division of Environmental	Academia		Technical expertise; Capacity-building or training; Communication or outreach;

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		Health, University of Cape Town			Participation in a working group or community of practice; Data or information;
84	Giulia Carlini	Center for International Environmental Law (CIEL)	Non-governmental organization	CIEL wants to congratulate the Chemicals and Waste Youth Platform on proposing this initiative and on working to raise awareness on children's health. We strongly support strengthened international action to protect children from toxic exposure, and share the importance of working on this topic at the GFC; The impacts of toxics and pollution on children's Rights could be strengthened in the proposal, including multisectoral and multistakeholders' collaboration with the human rights sector/expertise (on impacts, see e.g., the UN Special Rapporteur on Toxics and Human Rights' report A/HRC/33/41: Report on the rights of the child and hazardous substances and wastes);Considering that:- The scope of the definition of 'Issues of Concern' under the GFC could be interpreted as having a specific focus on (groups of) chemicals or on chemical management rather than on specific groups in situations of vulnerability or at risk, and if so, this could be a procedural obstacle in adopting children's health as a dedicated Issue of Concern;- Children's health is a cross-cutting issue, including its connection with the existing Issues of Concern under the GFC's predecessor SAICM, as identified by the proponents;The proponents might consider advancing the important work on this topic at the GFC through other means, including, for example, using the GFC's Mechanisms to Support Implementation, such as Implementation Programs.Regardless of the preferred way forward that will be decided, we remain strongly supportive and willing to contribute to advancing this crucial work.	Participation in a working group or community of practice; Technical expertise; Capacity-building or training; Communication or outreach; Other (please provide further details in the final comments section);CIEL supports stronger action on children's health and is actively working to strengthen international laws that will protect the health of children as well as future generations from toxic exposure.Depending on capacity and resource availability, we are interested in exploring the best ways to contribute to this work, including participation in the proposed multistakeholder/alliance model, should that be agreed upon.
85	Dr. Brian Donlon	European Union and its Member States	European Union and its Member States	The EU and its Member States recognise the importance of protecting children and young people from adverse impacts arising from exposure to hazardous chemicals and waste. Children represent a particularly vulnerable population group and their health and well-being should remain a central consideration in the implementation of the GFC.We note that children's health is inherently a cross-cutting issue that is relevant to a wide range of existing Issues of Concern, implementation programmes and sectoral sub-programmes.We further note that the proposal itself identifies the need to gather additional information on existing initiatives, current gaps and ongoing activities undertaken by international organisations and other stakeholders. A more comprehensive assessment of these efforts in the proposal would help identify where added value could be provided through the GFC and avoid duplication of ongoing work.While the broad approach is appreciated, it remains difficult to identify the specific actions that would generate the greatest impact.	The comments of the EU and Member States at this point are shared to strengthen the nomination of the issue of concern. The EU and Member States have no formal position at this point on issues of concern.Recognition of an Issue of Concern ultimately should not be interpreted as a commitment to provide all means of implementation required.

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				Further refinement could include a focus on priority chemicals or groups of chemicals of global concern, such as mercury, lead, endocrine-disrupting chemicals or PFAS. A stronger emphasis on data collection, knowledge sharing, prioritisation of actions and identification of funding opportunities would strengthen the proposal.	
86	Mariana Garanhão	Quercus - Associação Nacional de Conservação da Natureza	Non-governmental organization		Participation in a working group or community of practice; Communication or outreach;
87	Sara Brosché	IPEN	Non-governmental organization	This is a well written proposal that clearly lays out the need to strengthening action to protect children's health from hazardous chemicals, and streamlining it into all GFC implementation should be an GFC priority. The focus of this proposal is therefore important and should be considered at IC-1. However, it is important that the IC-1 decision and GFC action achieve the intended purpose and utilizes the most suitable and effective tools of the GFC. There is a risk that making children´s health an IoC may lead to the unintended consequence that this is viewed as a separate, siloed issue only relevant for specific work instead of its integration throughout GFC implementation. There is also a risk that no action is undertaken if this is not adopted as an IoC. We would therefore encourage a broad discussion at the IC-1 on the most effective approach to mainstreaming action to protect children´s health into the GFC. This should include the option of an IoC but also other approahces such an implementation program and/or an action plan, and/or a separate resolution on children´s health.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;IPEN, a global network of more than 700 public interest NGOs has an active Youth Caucus that will engage to move this important issue forward. In addition, IPEN expertise and experiences will help support the work as relevant.
88	Emma Cheuse	Earthjustice	Non-governmental organization	We have submitted by email comments supporting the nomination of Chemicals Management Issues of Special Concern for Children's Health, submitted by the following nonprofit, nongovernmental organizations. The comment is also available at this link: https://earthjustice.org/wp-content/uploads/2026/08/comments-global-chem-childrens-health-filed-08.21.26.pdf. Earthjustice, Beyond Pesticides, Breathe Project, California Communities Against Toxics, California Safe Schools, Center for Environmental Health, Church Women United in New York, State Climate Action Campaign at Humboldt UU Fellowship, Common Ground Rising, Comunidades Organizando el Poder y la Acción Latina (COPAL), Doctors and Scientists Against Wood Smoke Pollution, Don't Waste Arizona, Environmental Defence Canada, Green Science Policy Institute, Healthy Babies Bright Futures, Kentucky Resources Council, Long Term Print, Newburgh Clean Water Project, North American Climate, Conservation and Environment (NACCE), Occupational	Technical expertise; Data or information; Participation in a working group or community of practice; Communication or outreach;We look forward to hearing more information about ways to engage and help share information with other potentially interested organizations. Thank you for your time and consideration of this comment.

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				Knowledge International, Santa Cruz Climate Action Network, SEE (Social Eco Education), Seneca Lake Guardian, Texas Environmental Justice Advocacy Services, The Last Beach Cleanup, Tri-Valley Communities Against a Radioactive Environment (CAREs), Union of Concerned Scientists, Utah Physicians for a Healthy Environment, and Zero Waste San Diego.	
89	Belinda Mensah	All-Africa Students Union (AASU)	Non-governmental organization		Technical expertise; Participation in a working group or community of practice; Communication or outreach; In-kind support;
90	Hillary Mugota	Zimbabwe Environmental Law Organisation	Non-governmental organization	There are no further comments. The nomination and suggested workplan are well articulated	Data or information; Participation in a working group or community of practice; Communication or outreach; The organisation will use its existing networks on advancing children's rights to support this initiative
91	Yoshira Ornelas Van Horne	NA	Academia	I support the proposal as presented.	Participation in a working group or community of practice; Technical expertise; Data or information;
92	Kim Konte	Non-Toxic Neighborhoods	Non-governmental organization	Non-Toxic Neighborhoods strongly supports the proposed global initiative on Chemicals Management Issues of Special Concern for Children's Health.Children are uniquely vulnerable to toxic chemical exposures, yet they continue to encounter hazardous pesticides and other harmful chemicals where they live, learn, and play. This initiative should prioritize prevention, transparency, stronger protections for children and pregnant women, and the transition to proven safer alternatives.The workplan should specifically address pesticide exposure in schools, childcare facilities, parks, playgrounds, athletic fields, homes, and other places children frequently use. Youth, parents, public health experts, and those directly affected by chemical exposure should have meaningful roles in shaping and implementing this work.Non-Toxic Neighborhoods has helped more than 300 local governments and school districts transition toward Organic Land Management, demonstrating that reducing children's exposure to hazardous pesticides is both practical and achievable. With teams in the United States, Australia, New Zealand, and the United Kingdom, we see the urgent need for coordinated global action and strongly urge adoption of this initiative.	Participation in a working group or community of practice; Communication or outreach; Data or information;Non-Toxic Neighbourhoods can provide technical guidance, educational resources, case studies, and proven policy and legislative models from our work helping more than 300 local governments and school districts reduce hazardous pesticide use. Our youth teams can also support international outreach, stakeholder engagement, education, and youth leadership to protect children from toxic exposures where they live, learn, and play.

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93	Maria Doa	Environmental Defense Fund	Non-governmental organization		Technical expertise;
94	Mary Beth Terry	Silent Spring Institute	Non-governmental organization		Communication or outreach;
95	Kenneth Cook	Environmental Working Group	Non-governmental organization	Agree with nomination and workplan as is.	Technical expertise; Data or information; Participation in a working group or community of practice; Communication or outreach; Support in science, policy and communications.
96	Satvika Krishnan	ELD Foundation	Trust	I support the proposal as presented	Capacity-building or training; Technical expertise;
97	Mohsen Alshateri	Environemt Protection Authority- Yemen	Government	The Environment Protection Authority in Yemen issues this official comment to express its full support for the proposal submitted by the Youth Platform for Chemicals and Waste, an informal working group concerned with chemicals and their impact on children's health, regarding "Chemical Management Issues of Particular Importance to Children's Health." This proposal calls for a clear, shared, and measurable global goal to protect children from exposure to toxic and hazardous chemicals, and focuses on:• Children's biological vulnerability: Children go through critical developmental stages during which their nervous, immune, and endocrine systems develop rapidly. This makes them more susceptible to the long-term chronic effects of exposure to low doses of chemicals compared to adults.• Intergenerational equity and children's rights: The UN Convention on the Rights of the Child guarantees every child the right to life, development, and a safe and healthy environment.• Economic and health burdens: Diseases associated with early-life exposure to chemicals place a heavy burden on national healthcare systems.• Based on the above, we believe this proposal will promote the following:1. Establishing children's health as a top priority and ensuring its recognition as a key priority within the operational roadmap of the Global Chemicals Framework.2. Establishing specific standards and clear international indicators for monitoring levels of hazardous chemicals in products intended for children (such as toys, school supplies, and clothing) as well as in their immediate living environments (such as schools and parks).Investing in protecting our children from toxic chemicals today is the cornerstone of building a	Communication or outreach; Data or information;

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				sustainable future and a healthier generation capable of leading the world tomorrow. We strongly urge all Member States and stakeholders to adopt this scientifically and humanely grounded proposal.	
98	Sara Grantham	Beyond Pesticides	Non-governmental organization	As the proposal aims for "reducing hazardous environmental exposures," "requiring targeted action to better protect children," and a "paradigm shift toward chemical policies explicitly prioritizing children's health," specific standards need to be incorporated to eliminate children's exposure to toxic chemicals, including pesticides and other harmful contaminants. In using the standards set forth by the U.S. Department of Agriculture (USDA) and the National Organic Standards Board (NOSB) as a model, which prohibit nearly all petrochemical pesticides and all synthetic fertilizers, as well as sewage sludge (biosolids) and irradiation, the Global Framework on Chemicals has the opportunity to address the current public health, biodiversity, and climate crises that are perpetuated by an unnecessary reliance on toxic chemicals. Under the Organic Foods Production Act (OFPA), organic producers are prohibited from using synthetic inputs unless found by the NOSB that their use: "(i) would not be harmful to human health or the environment; (ii) is necessary to the production or handling of the agricultural product because of the unavailability of wholly natural substitute products; and (iii) is consistent with organic farming and handling." These standards are a strong, precautionary model for protecting children's health in other policy areas. For additional information, see Beyond Pesticides' full comments on the Chemicals Management Issues of Special Concern for Children's Health proposal here: bp-dc.org/bp-comments-on-chemicals-management-issues-of-special-concern-for-children's-health-proposal-august-2026	Data or information; Participation in a working group or community of practice; Communication or outreach; Other (please provide further details in the final comments section);Financial support;Beyond Pesticides is interested in participating in a coalition or working group(s), as well as collaborating with the National Pesticide Forum regarding children's health. Please review Beyond Pesticides' previous comments and relevant databases:https://bp-dc.org/bp-comments-on-pfas-human-rights-un-submission-january-2026https://www.beyondpesticides.org/resources/pesticide-gatewayhttps://www.beyondpesticides.org/resources/eating-with-a-conscience/overview
99	Aishwarya Das	Land Guard AI	Youth organization	We support the nomination and consider the proposed issue relevant to the objectives of the Global Framework on Chemicals. We recommend that the work plan include clear objectives, measurable outcomes, defined timelines, and identified responsibilities. It should also promote stakeholder participation, knowledge-sharing, capacity-building, and support for developing countries. Implementation should be science-based, inclusive, transparent, and coordinated with existing initiatives to avoid duplication.	Participation in a working group or community of practice; Communication or outreach;Where appropriate, our organization could participate in multi-stakeholder and multisectoral activities, including capacity-building, public engagement, data and information exchange, and the development or review of relevant guidance and materials. We would welcome further engagement with the Secretariat and other stakeholders to identify specific areas in which our expertise, networks, and experience could support implementation of the proposed work plan.

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100	Amy Padula	Program on Reproductive Health and the Environment, University of California San Francisco	Academia	The UCSF Program on Reproductive Health and the Environment (PRHE) strongly supports recognition of Chemicals Management Issues of Special Concern for Children's Health as an Issue of Concern under the Global Framework on Chemicals.Scientific evidence demonstrates that hazardous chemical exposures during prenatal development, infancy, childhood, and adolescence can have lifelong consequences. These are uniquely susceptible periods of rapid development. PRHE encourages the Framework to explicitly recognize that children's environmental health begins before birth and that prenatal exposures must be considered in chemical testing, risk assessment, monitoring, and prevention.Protection also requires moving beyond a one-chemical-at-a-time approach. Children experience cumulative exposures and chemical mixtures through multiple pathways. Chemicals management should account for these combined exposures and the disproportionate burdens experienced by communities facing greater environmental and social stressors.PRHE strongly endorses the workplan's proposed advances in chemical safety testing, hazard and risk assessment, safer alternatives, substitution, and chemical innovation that account for life-stage vulnerabilities. Protecting development should be built into how chemicals are designed, tested, assessed, and regulated from the outset, rather than addressed only after harmful exposures occur.Given substantial gaps in toxicity testing and child-specific data, PRHE also recommends explicitly incorporating the precautionary principle: lack of complete scientific certainty should not delay action to prevent potentially serious or irreversible harm.We support a dedicated international mechanism that places prevention, precaution, developmental vulnerability, environmental justice, and the best available science at the center of chemicals management. Protecting children's health and development should be a fundamental benchmark for chemicals policy worldwide.	Technical expertise; Data or information; Participation in a working group or community of practice;
101	Jerrold heindel	Heeds.org	Non-governmental organization		Communication or outreach;
102	Amany Mohamed	Ministry of Local Development and Environment	Government		Capacity-building or training; Participation in a working group or community of practice;
103	Urielle Jessica Legbane	IPEN Youth CAUCUS	Non-governmental organization	On the workplan: most indicators of progress are process-based (e.g., number of consultations held, resources produced, stakeholders engaged). We suggest complementing these with a few measurable outcome-oriented indicators for example, number of countries reporting age-disaggregated exposure data, or specific reductions in child exposure	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Data or information; In-kind support;

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				biomarkers ,to strengthen accountability and alignment with the GFC's measurability structure.	IPEN Youth Caucus can contribute technical review, scientific literature synthesis, and Global South/youth civil society perspectives to further discussions on this issue.
104	TCHIGO Yovo Expédit	GREDD	Non-governmental organization		Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;
105	Maureen Swanson	Project TENDR (Targeting Environmental Neuro-Development Risks)	Non-governmental organization	Project TENDR is an alliance of scientists, health professionals, and environmental health advocates working to protect children from toxic chemicals that can harm brain development and contribute to problems with learning, attention, and behavior. We support the proposal as presented and believe this is an important and much needed issue of concern to adopt as part of the Global Framework on Chemicals.	Data or information; Participation in a working group or community of practice;We would be glad to share expertise and evidence on harm from toxic chemicals to the developing brains of children. Project TENDR unites scientific evidence with advocacy to inform and influence policy change to protect children and pregnant women from neurotoxic threats. If requested, we would look forward to collaborating and strategizing with stakeholders to arrive at policy recommendations to prevent neurotoxic exposures to vulnerable populations.
106	Kristin Schafer	Collaborative for Health and Environment	Non-governmental organization	We support the proposal as presented.	Technical expertise; Data or information; We work with a large network of environmental health researchers, many of whom have expertise specific to children's environmental health.
107	Tanya Coventry-Strader	Mothers and Others for Clean Air	Community Based Organization		Technical expertise; Participation in a working group or community of practice;Our Healthy Air is Healthcare program trains healthcare professionals to become advocates for clean air policy in their communities. We could provide SME's for trainings and meetings with policy makers.
108	Shailand Gunnoo	Not Applicable (Individual Consultant)	Civil society	Despite several facts and figures are stated by the proponents on how children are at risk, there are existing mechanisms to protect children from chemical exposures. For instance, at workplaces where hazardous	Technical expertise; Participation in a working group or community of practice; Communication or outreach;Capacity-

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				chemicals are produced, handled or stored, children are officially not allowed on premises. Besides international instruments such as the ILO Worst Forms of Child Labour Convention (C-182) and its Recommendation 190 show a duty of care against childrenIt is suggested that the UNICEF be the co-lead. With various capabilities (logistics, staff, technical, etc.) this can be beneficial for protecting children against hazardous exposures. It also has representations in various parts of the world and further to activities earmarked in the workplan, policies and programmes would be easily cascaded at national and regional levels. The workplan can be extended to 2035 or beyond as activities can be over long-term e.g. awareness-raising in different communities, legal reviews for better enforcement, etc. Greater emphasis need to be on sensitizations as children/ youth may be exposed to chemicals a result of lack of awareness e.g. they may be 'forcefully' present on a site while their parents are working in pesticides-sprayed fields, in hazardous dumping grounds or e-wastes dismantling sites, etc. Moreover, girls of child-bearing age need to be properly sensitized on risks to the health of a foetus during pregnancy if exposed. Some activities described in the workplan are also applicable for protecting adults. It is recommended to focus on ones which are more oriented towards children and youth as target groups. For e.g. instead of chemical safety testing and risks assessments (which seem more relevant to working populations), activities can rather be on the introduction of chemical safety concepts at basic levesl in secondary school curriculum. Accordingly, other organisations can be invited for being part of stakeolders for this IoC such as the UNESCO, academia.	building or training;As a committed individual, I would be glad to contribute in discussions, meetings, project activities, report writings /reviews, etc.
109	Iman Fadhil Nassar	Ministry of Environment	Government	The Ministry of Environment in the Republic of Iraq highly values the nomination addressing 'Chemicals Management Issues of Special Concern for Children's Health.' Given that children and adolescents represent a large proportion of the population in developing countries and suffer disproportionately from chemical exposures, we emphasize the following key points for successful implementation:1. Age-Disaggregated Data and Monitoring: Building institutional capacities in developing countries to generate, track, and utilize age-disaggregated data concerning chemical exposures and health outcomes, aligning with Target B7 of the GFC.2. Policy Integration and Guidelines: Developing practical, child-responsive guidance tools to systematically incorporate early-life vulnerabilities into national risk assessments, regulatory frameworks, and chemical safety policies.3. Cross-Sectoral Collaboration: Strengthening multi-stakeholder and multi-sectoral	As the Ministry of Environment of Iraq, we can contribute by sharing national experiences and perspectives from developing nations regarding children's environmental health, participating in the proposed multistakeholder working groups and knowledge-sharing platforms, supporting the implementation of child-protective chemical guidelines, and raising national and regional awareness on minimizing chemical risks during early developmental stages

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				cooperation—spanning health, environment, education, and labor—to ensure holistic protection across the entire chemical lifecycle	
110	Dalia Mori	Chemicals Management of Special Concern for C hildrens Health	Youth organization	Firstly, the impacts section on health or the environment is thorough on human health and brief on bio divessity and the ecosystem impacts and yet we do understand the primary focus is childrens health. A short paragraph with available data on how the same chemicals affecting child development also affect wildlife would strengthen the nominaton's completenes.	Participation in a working group or community of practice;Resilient40 is a pan African youth climate action network with experience in climate communications and youth engagement. We could contribute through communication, outreach support and participation in the proposed multistakeholder working group, particularly to help amplify child responsive chemicals management within African youth Climate networks.
111	Jakia Sultana	Environment and Social Development Organization-ESDO	Non-governmental organization	ESDO welcomes this nomination and supports the recognition of children's health as a dedicated Issue of Concern under the Global Framework on Chemicals. The proposal is well justified, scientifically robust, and clearly aligned with the Framework's vision and objectives.To further strengthen the nomination, we recommend explicitly recognizing the challenges faced by low- and middle-income countries, where children are disproportionately exposed to hazardous chemicals through informal recycling, waste management, contaminated consumer products, occupational take-home exposure, and legacy pollution. Greater emphasis on implementation support, including technical assistance, technology transfer, and sustainable financing, would improve the practicality of the proposed workplan.The workplan could also benefit from more outcome-oriented targets and indicators, such as the number of countries adopting child-responsive chemicals management policies, strengthening biomonitoring and age-disaggregated exposure data, reducing priority childhood chemical exposures, and integrating children's health considerations into national chemicals and waste management strategies.To maximize efficiency and avoid duplication, coordination with existing and future Issues of Concern, including lead, chemicals in products, endocrine-disrupting chemicals, highly hazardous pesticides, and electronic waste should be explicitly incorporated into the implementation arrangements. Finally, meaningful participation of governments, civil society, academia, youth, healthcare professionals, and affected communities should be maintained throughout implementation to ensure equitable and evidence-based decision-making.	In-kind support; Communication or outreach; Capacity-building or training; Participation in a working group or community of practice; Data or information; Technical expertise;ESDO can contribute technical expertise, policy experience, and evidence from its work on chemicals and waste management, lead exposure prevention, and environmental health. We can share research findings and national case studies, participate in multi-stakeholder working groups, and support capacity-building and stakeholder engagement. ESDO is committed to collaborating with partners to advance child-responsive chemicals management, particularly in developing countries.

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112	Nida Parks	Pure Earth	Non-governmental organization	For over two decades, Pure Earth has worked on the frontlines of protecting children and other vulnerable populations from exposure to toxic chemicals, with an emphasis on lead exposure. Childhood lead poisoning is most prevalent in low- and middle-income countries (LMICs), where an estimated one in two children carries a blood lead level above the reference threshold. Lead exposure in early childhood causes irreversible neurodevelopmental harm, reduced IQ, and lifelong economic loss, yet it remains preventable. Pure Earth's approach and country-level interventions — including source identification (informal battery recycling, spices, cookware, paint), remediation, and policy reform — demonstrate that measurable, rapid progress is possible when children's health is placed at the center of chemicals management.However, the vast majority in LMICs where lead exposure is most prevalent lack the surveillance, health infrastructure, and regulatory capacity necessary for identifying and preventing exposure. Age-disaggregated biomonitoring, child-specific risk assessment, and dedicated technical and financial support remain scarce outside a handful of high-income countries. A fragmented, chemical-by-chemical approach has left systemic gaps in capacity-building, data, and coordinated international action.Pure Earth believes this proposed Issue of Concern offers a vital opportunity to institutionalize what the lead experience has taught the global community: that child-centered, evidence-based, and adequately resourced chemicals management saves lives and protects human potential at scale. We welcome the opportunity to serve as a technical partner and contributor to the proposed Multistakeholder Group, sharing our field experience in LMIC lead interventions to help shape a broader, coordinated agenda protecting all children from harmful chemical exposures.We urge GFC stakeholders to endorse this nomination.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;We welcome the opportunity to serve as a technical partner and contributor to the proposed Multistakeholder Group, sharing our field experience in LMIC lead interventions to help shape a broader, coordinated agenda protecting all children from harmful chemical exposures.
113	Mitsugu Saito	Ministry of the Environment, Japan	Government	According to the Global Framework on Chemicals (GFC) outcome document, an Issue of Concern (IoC) includes an issue that is insufficiently addressed and may benefit from international action. Children's particular vulnerability to chemical exposures is widely recognized, and the nomination provides substantial information on related health impacts. The nomination should, however, more clearly identify the specific gaps that remain insufficiently addressed and demonstrate the added value of establishing a stand-alone IoC. To date, a wide range of initiatives concerning children's environmental health have been undertaken by WHO, UNICEF, national governments and other relevant actors. The proposal points out that no international programme exists that focuses exclusively on "chemicals management	Technical expertise; Data or information In Japan, the Ministry of the Environment is conducting the Japan Environment and Children's Study (JECS), a nationwide birth cohort study of about 100,000 mother-child pairs. JECS generates scientific evidence on environmental exposures during pregnancy and childhood and their potential effects on children's health and development. Japan could contribute by sharing published findings

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				issues of particular concern to children's health." It should further clarify how the proposed IoC would complement these initiatives and existing GFC issues, avoid duplication, and address gaps that cannot be adequately addressed through them. Children's health is inherently cross-cutting and should be considered across relevant GFC activities, irrespective of whether a stand-alone IoC is established. The nomination should therefore explain more clearly what additional functions a dedicated IoC would perform beyond such mainstreaming. As one possible approach, child-related criteria or markers, similar in concept to the UNCT Gender Equality Marker, could be considered in the design, assessment and monitoring of relevant GFC activities and projects. This could help direct attention to the particular exposure patterns and vulnerabilities of children, especially in countries with limited risk-management capacity and a high proportion of children and young people in their populations.	and general lessons learned through the study.
113	Laura Nazef	Office of Chemical Safety and Pollution Prevention United States Environmental Protection Agency	Government	One question we have is whether establishing such a broad IoC is the most effective way to address the issues raised in this proposal. Would creating such a broad IoC decrease the likelihood of directing energy and resources to the most-pressing needs for children's health and chemicals? If the issue of concern were a bit more focused, it might be possible to more effectively advance chemicals-related children's health issues. As we read the proposal, a potentially more focused issue of concern could be something such as, "identify how children are exposed to chemicals and develop strategies to reduce exposures." This would focus thought and action in two important areas: gathering exposure-related information and identifying best practices for reducing exposure. Another possibility could be to build this focus on exposure into a work plan developed under the IoC. The United States has stated in other fora that it will no longer reaffirm the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). We would like to see the GFC focus on achieving its strategic objectives rather than rely on vague buzzwords or blanket references to the SDGs.	

Annex 2: Comments received on harmonization of global efforts to protect human, animal, and environment health against the threat from hazardous chemicals by transitioning to new approach methods

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
1	TCHOKOUATOU Ghislaine Doralie	Action des Femmes pour une Planète Bio (AFEPB)	Non-governmental organization	Overall, the nomination is well prepared, evidence-based, and presents a strong rationale for promoting New Approach Methodologies (NAMs) under the Global Framework on Chemicals. It clearly identifies the problem, demonstrates the added value of the GFC, and provides a structured workplan with relevant activities, indicators, and timelines.To further strengthen the nomination, we suggest placing greater emphasis on the specific needs and realities of low- and middle-income countries, particularly in Africa. The workplan could include more concrete actions to support technology transfer, sustainable financing, institutional capacity building, and regional centres of excellence to facilitate NAM implementation in resource-constrained settings.In addition, the proposal could further highlight the role of civil society organizations, women, youth, Indigenous Peoples, and local communities in awareness-raising, policy dialogue, and implementation. Their meaningful participation would strengthen ownership and ensure more inclusive and equitable outcomes.Finally, consideration could be given to including indicators that measure the uptake of NAMs in developing countries, improvements in regulatory capacity, and progress in international cooperation and knowledge sharing.Overall, Action des Femmes pour une Planète Bio supports the nomination and considers it a valuable contribution to strengthening global chemicals management while advancing human health, environmental protection, and sustainable development.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;Other (please provide further details in the final comments section);Action des Femmes pour une Planète Bio can contribute through technical expertise on chemicals and waste management, capacity building, awareness raising, policy advocacy, and community engagement, particularly in Africa. We can support knowledge dissemination, stakeholder consultations, and the integration of gender and vulnerable populations' perspectives to promote the effective and inclusive implementation of New Approach Methodologies (NAMs).
2	Jakia Sultana	Environment and Social Development Organization-ESDO	Non-governmental organization	ESDO supports the nomination and recognizes the importance of New Approach Methodologies (NAMs) in advancing more efficient, human-relevant, and science-based chemical safety assessment. To maximize global impact, the workplan should place greater emphasis on supporting developing countries through capacity-building, technology transfer, knowledge sharing, and regulatory strengthening to enable effective adoption of validated NAMs. It would also benefit from more measurable implementation outcomes, including indicators for regulatory uptake, institutional capacity, and integration into national chemicals management systems. Strong coordination with OECD, WHO, and other relevant initiatives should be maintained to maximize synergies, avoid duplication, and ensure equitable access to NAM knowledge and technologies.	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;ESDO can contribute technical expertise on chemicals management and support the adoption of New Approach Methodologies through capacity-building, knowledge sharing, regulatory strengthening, and stakeholder engagement. We can participate in multi-stakeholder working groups, contribute to communication and outreach, share implementation experiences from developing-country contexts, and provide in-kind technical support to promote sound chemicals management.

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3	Dolly Wong	Independent	Independent Expert (Member, Pool of Experts, United Nations Regular Process)	The nomination is well developed. One aspect that could strengthen the workplan is recognizing the importance of periodically updating the biological and ecological evidence base that informs chemical assessment and management. Before applying New Approach Methodologies (NAMs) to assess hazardous chemicals, the organisms or biological resources subject to chemical management should also be re-evaluated using current scientific knowledge and technologies. Advances in ecology, genomics, biotechnology, biomaterials science and analytical methods may identify new functions or values that reduce the need for hazardous chemical use, complementing Safe-and-Sustainable-by-Design approaches and supporting more sustainable chemicals management.	Data or information;Relevant case studies for consideration include the BES-Net Knowledge Library: The Royal Golden Cocoon of Java: Cricula trifenestrata (Indonesia) https://www.besnet.world/library/the-royal-golden-cocoon-of-java-cricula-trifenestrata-indonesia/ and the FAO abstract From Pest to Quest https://zenodo.org/records/15688908, illustrating how advances in scientific knowledge can reveal sustainable alternatives to hazardous chemical use.
4	CHUKWUDI NORBERT EGWUAGU	NEDUCHUKS MULTI CONCEPT	Non-governmental organization	BEST PRACTICES should be followed in revising the workplan etc.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Wiling and Ready to contribute and partner
5	Rebecca Okello Abongo	East Africa Trade Union Confederation/COTU (K)	Trade Union	The nominated IoC will bore more questions on how, where, when, who and more emerging issues, plus take in consideration environmental, social and environmental issues which speaks on harmonization of issues of concern	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;Sectorial and workers issues thus labour and human rights concerns.
6	Jin Tada	UNISC International	Youth organization	The nomination compellingly establishes why the GFC is uniquely positioned to advance the global transition to NAMs for hazardous chemical risk assessment. NAMs represent a pivotal Twin Transition opportunity replacing resource intensive animal testing with human relevant computational models high throughput in vitro assays and AI predictive toxicology.However to ensure the proposed workplan achieves equitable and non extractive global impact across vulnerable populations and ecosystems driving SDG 3 SDG 6 SDG 12 SDG 13 SDG 14 and SDG 15 we recommend four critical structural revisions.First regarding Bridging the Digital Translation Gap the workplan must mandate that complex NAM toxicity profiles predictive QSAR models and exposure algorithms are translated into accessible and multi lingual digital formats. Raw computational toxicity outputs often create a severe translation gap that leaves frontline communities civically paralyzed amidst hazardous chemical exposure.Second concerning Preventing Data Colonialism in NAM Infrastructures global NAM data repositories must adopt Decentralized Environmental Data Trust architectures. Frontline	Communication or outreach; Capacity-building or training; Data or information;We operationalize the NAM framework of the GFC through three avenues. First we deploy AI Carson translating QSAR data into localized narratives for resource constrained communities. Second we build decentralized IoT data trusts empowering municipalities to govern chemical data sovereignty. Third our Kankyo Cafe workshops train youth as Citizen Data Scientists to audit AI models aligning actions with TNFD.

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				communities and regional institutions in developing jurisdictions must retain sovereign ownership over local exposure and bio monitoring datasets preventing extractive corporate data practices.Third for Algorithmic Stewardship and TEK Synthesis computational toxicology models must incorporate localized ground truthing and TEK. Machine learning algorithms predicting chemical fate must be reconciled with generational ecological observations to protect delicate aquatic ecosystems and bioaccumulation vectors.Fourth addressing Democratized Capacity Building Targets implementation timelines must explicitly target youth and local stakeholders equipping them as Citizen Data Scientists who can run and audit low bandwidth open source NAM tools directly on site.	
7	Federica Pirro	Italian Centre for Sustainable Healthcare	no profit		Communication or outreach;
8	Sonali Zol	Sonali Zol Foundation	Non-governmental organization	We need to verify if real data of global forest are given or published by the countries looking toward heat wave and use of hazardous chemicals in food too we need to verify what substance has been added and how it is being delivered or transported and in which country do it is being mostly in large quantity distributed and why	Participation in a working group or community of practice; Technical expertise; Communication or outreach; Capacity-building or training; In-kind support; It focus on STEM and Sustainable Development goals all 17 it's newly formed organisation if it received fund then only it can help constituency but work will be needed on ground
9	NZOBADILA BILONGO Richardel	Association des Enseignants et des Professeurs de Français pour la Protection de l'Environnement au Congo	Non-governmental organization	L'Association des Enseignants et des Professeurs de Français pour la Protection de l'Environnement au Congo travaille entre autre dans le domaine des enjeux prioritaires environnementaux de lutter contre l'utilisation des pesticides, des produits chimiques et des déchets dangereux, de lutter contre la désertification des terres, de préserver des espèces migratrices de la faune sauvage, de conserver les ressources des forêts et la de flore, de gérer durablement la pollution plastique dans le milieu marin et environnemental, de conserver la nature et la gouvernance forestière, de gérer la viabilité des dispositifs des aires protégées des zones terrestres, marines et côtières, de protéger les écosystèmes et la biodiversité marine, de protéger l'environnement contre les émissions et rejets anthropiques de mercure, de garantir l'accès à l'eau, d'assurer l'assainissement et de promouvoir le développement durable, de conserver la gestion durable des zones humides, de redynamiser les secteurs de l'agropastoral et de la productivité agricole,	Financial support; Participation in a working group or community of practice; Data or information;Communication or outreach; Capacity-building or training; Technical expertise;

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				de lutter contre les dégèlements climatiques pour la défense globale de l'environnement.	
10	Joseph DENOUGBETO	ONG La Grande Puissance de Dieu	Intergovernmental organization	We would like to suggess that the nominated issues concern to be explained/defined as this: "Efforts to harmonize global actions for protecting human, animal, and environmental health from hazardous chemicals are being enhanced through the adoption of New Approach Methods (NAMs). These methods aim to provide innovative alternatives to traditional testing, promoting safety and efficacy in chemical assessments."	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Data or information; Technical expertise;Our organization could contribute by participating in meetings with our support, sharing experiences, collaborating in events organization and capacity - building.
11	Anne Burgers	Stichting Proefdiervrij	Non-governmental organization	We fully support the workplan on harmonizing the global efforts to protect human, animal, and environment health against the threat from hazardous chemicals by transitioning to New Approach Methods. Safety of chemicals has historically been judged by using animal experiments. Not only do these severely harm the animals and are therefore ethically debatable, but it has become more and more clear that animal experiments do not properly reflect the human situation. Norman (2019) stated that up to 88% of products tested in animals turned out to have toxic effects in humans. Luckily the need to move away from animal testing and focus on non-animal, human based research methods (NAMs) is being recognized more and more. For instance the EU, UK and USA are working on roadmaps to phase out animal testing for chemical safety assessment. To ensure this becomes a global movement, to harmonise chemical safety testing and to coordinate efforts, we believe it is crucial that this is taken up by th UN Global Framework on Chemicals.	Technical expertise; Data or information; Participation in a working group or community of practice; Communication or outreach;We are more than willing to join working groups and share our expertise. We have a broad network amongst scientists, companies and policy makers that are working on human-based research methods (mainly focussed on the Netherlands).
12	Sabrina Baraka	GAIA - Global Action in the Interest of Animals	Non-governmental organization	GAIA — Global Action in the Interest of Animals — strongly supports the Issue of Concern submitted by the World Federation for Animals under the UN Global Framework on Chemicals (GFC).This initiative is essential to ensure that the GFC advances modern, human-relevant and animal-free science rather than increasing reliance on animal testing. The development, validation, regulatory acceptance and implementation of New Approach Methodologies (NAMs) should be a global priority.NAMs can improve chemical safety assessment, foster innovation and better protect human health, animal welfare and the environment. International coordination is crucial. If countries strengthen chemicals legislation without clearly supporting NAMs, new or additional animal tests may be required, contrary to scientific progress and growing ethical expectations.The EU, the US and other jurisdictions are already developing roadmaps and regulatory initiatives to accelerate the development, validation, acceptance and use of NAMs. The GFC should align with these efforts to promote international regulatory	Technical expertise; Data or information; Participation in a working group or community of practice; In-kind support; Communication or outreach; Capacity-building or training;GAIA would be willing to contribute to this work by providing a civil society and animal protection perspective, sharing its experience in advocacy, public campaigning and monitoring policy developments in Belgium, and supporting awareness-raising, advocacy and stakeholder engagement activities aimed at promoting the transition towards animal-free methods.

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				harmonisation, avoid fragmentation and support the transition to animal-free methods.GAIA therefore supports including this Issue of Concern in the GFC's future work. We call for a clear and practical work plan covering regulatory harmonisation, capacity-building, data sharing, training, stakeholder involvement and the effective uptake of NAMs in chemical safety assessment.Civil society and animal protection organisations must be fully involved alongside regulators, scientists, toxicologists, industry representatives and NAM developers. They can help ensure that the transition remains ambitious, transparent and focused on replacing animal testing wherever scientifically possible.GAIA considers the nomination a strong basis for action, but urges that the future work plan include clear operational objectives, measurable indicators, defined responsibilities and a precise timeline.	
13	Sandrine Dubrac	Medical University of Innsbruck	Academia	The transition to NAMs should go beyond replacing individual animal tests with individual in vitro assays. It should promote integrated, human-relevant approaches that better reflect human biology and provide more informative data for regulatory decision-making.Advanced human 3D skin models illustrate this progress. Reconstructed human epidermis, full-thickness skin equivalents and skin-on-chip systems reproduce key aspects of skin architecture, barrier function and cellular interactions. They offer strong potential for assessing irritation, sensitisation, toxicity, endocrine activity, metabolism and complex chemical exposures. Continued work is needed to improve biological fidelity, standardisation, reproducibility and fit-for-purpose validation.The next step is integrating complementary experimental and computational approaches. Artificial intelligence and machine learning can enhance 3D models by analysing complex multi-omics and imaging datasets, identifying biomarkers and mechanisms, and improving prediction of human biological responses. Combined with validated human models, AI can strengthen chemical safety assessment.International agreement on model qualification, validation, data interoperability and performance criteria is essential for regulatory acceptance. A fit-for-purpose, weight-of-evidence approach will often be more appropriate than seeking a single replacement method.I consider the Issue of Concern provides sufficient information to address this challenge and would be pleased to contribute technical expertise and involve participants of COST Action CA21108 (NETSKINMODELS). Expertise in advanced human 3D skin models, their validation and standardisation, and their integration with AI could support working groups, capacity building and regulatory implementation.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;

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14	Emma Brunberg	Djurskyddet Sverige/Animal Welfare Sweden	Non-governmental organization	Animal Welfare Sweden is happy to support this well-written and well-organised IoC. The development of non-animal testing methodologies can significantly improve animal welfare and respond to the growing ethical concerns and public expectations to replace animal testing. However, promoting and coordinating the transition towards non-animal testing is not only a matter of ethics and animal welfare. As explained in this nomination, it is well established that the development and usage of New Approach Methods can contribute to safe use of chemicals as well as better protection of human health and the environment. Moreover, they have the potential to be faster, more scientifically relevant and cost-efficient than animal testing protocols. The field is developing rapidly, but global coordination is necessary to overcome existing barriers and promote international harmonisation, implementation, regulatory frameworks and validation.	Communication or outreach;
15	Seongnam Kim	KAWA(Korean Animal Welfare Association)	Non-governmental organization	The transition to New Approach Methodologies (NAMs) is a timely and necessary step that aligns with both the GFC's vision and the 3Rs principles, as it improves the accuracy and human relevance of chemical safety assessment while fundamentally reducing, and ultimately replacing, unnecessary animal use.To further strengthen the workplan, we would like to suggest the following revisions. First, the evidence on impacts to biodiversity and ecosystems could be developed as thoroughly as the evidence on human health impacts, which would broaden the comprehensiveness of the issue. Second, several activities in the workplan are assigned broad timeframes such as "Years 1-3," and clarifying the relative priority and sequencing of these activities would make implementation easier to monitor. We believe incorporating these refinements would help this nomination contribute to reducing global reliance on animal testing and embedding the 3Rs principles more fully into chemical management as a whole.	Communication or outreach;Our organization is one of the most influential animal protection organizations in Korea, with a vision centered on the 3Rs. We can provide communication and outreach support for this initiative, including disseminating information on NAMs through our domestic and international networks, designing stakeholder-facing campaigns, and raising public awareness through social media and press engagement to support the GFC's transition toward non-animal testing methods.
16	Rachel Smith	Animal-Free Science Advocacy	Non-governmental organization	Animal-Free Science Advocacy (AFSA), an Australian not-for-profit organisation and member of the International Council on Animal Protection in OECD Programmes (ICAPO), supports this nomination.The Issue of Concern identifies a key barrier. Fragmented regulatory acceptance, not the absence of methods, is now the main constraint on the use of New Approach Methods (NAMs) in chemical safety assessment. Harmonising validation expectations and data requirements is a task no single jurisdiction can complete alone, and the Global Framework on Chemicals is well placed to coordinate it.We fully support the workplan as drafted. We note one point of detail. The nomination states on page 5 that roadmaps exist in the European Union, United States, United Kingdom, Canada and Australia to phase out	Technical expertise; Participation in a working group or community of practice;Limited to non-financial support such as participation in working groups of submitting feedback to proposals

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				regulatory animal testing. Australia has no such roadmap. Australia's national science agency published Non-animal models: A strategy for maturing Australia's medical product development capabilities in 2023, containing ten recommendations, but no government commitment has followed. We raise this because the point strengthens rather than weakens the case for this Issue of Concern.Australia does prohibit the use of new animal test data for industrial chemicals introduced solely for use in cosmetics, under the Industrial Chemicals Act 2019. Beyond that measure, Australian regulatory acceptance of New Approach Methods (NAMs) is fragmented across four separate regulators covering industrial chemicals, agricultural and veterinary chemicals, therapeutic goods, and food. Australia is an OECD member country and relies on validation and guideline development conducted elsewhere, demonstrating that the coordination gap is structural rather than a matter of national capacity, and is a neglected priority of the Global Framework on Chemicals.	
17	Roland Cash	Transcience	Non-governmental organization	This is a crucial issue from scientific, economic, and ethical standpoints alike. All the conditions appear to be in place to rapidly advance animal-free chemical testing methods that are both more faster and reliable than animal methods. Indeed, international competition in this field is fierce.	Communication or outreach; Data or information;
18	Raleigh Davis	International Council of Chemical Associations	Private sector	ICCA recommends that this issue be renamed. New Approach Methods (or NAMs) per se are not an issue of Concern, but the use of animal tests where NAMs have already been developed and accepted by OECD should be the issue itself. ICCA would recommend retitling the IoC to reflect what the actual concern is. The use of NAMs in chemical safety assessment is a critical issue, both for the purpose of reducing animal testing and for refining the evaluation of impacts on human health in safety testing. ICCA believes there is value in advancing initiatives toward regulatory adoption under globally harmonized guidelines and rule-making. We support the use of NAMs in the early stages of product development, it is also necessary to add that risk-based product development is important, rather than development that focuses solely on hazard-based considerations.We agree that the GFC appears poised to promote institutional development, technology transfer, and information sharing in developing countries with the goal of international harmonization, where feasible. However, a clear policy directive in developed countries must also be prioritized, as they have not yet identified an effective direction for NAMs implementation.Additionally, since various NAMs initiatives are already underway, it is vital that we proceed with caution to avoid duplication. We strongly support OECD leading this topic, as they drive much of the work and research on NAMs to this day. GFC could be a platform to disseminate best practices in	Technical expertise; Capacity-building or training; In-kind support; Participation in a working group or community of practice;Technical and in-kind support.

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				jurisdictions where such methodologies are already in use and promote capacity building. Globally, promoting the use of NAMs has been a goal for many years, but concrete discussions regarding technical development goals or approaches to government use falter, Even if NAMs are adopted as an IoC, we believe that determining how to outline the future direction will remain a challenge.	
19	Jaimie P. Cloud	The Cloud Institute for Sustainability Education	Non-governmental organization	-	-
20	KOUSSEMIA BASSIGUE	Ken. G. Morka Foundation(Grass roots Movement)	Non-governmental organization	This application presents a credible Chadian community leader with lived experience of disability and concrete expertise in coordinating community programs (nutrition, education, water, inclusion). She will bring a Sahelian, and more specifically Central African, perspective to your organization.Suggestions for revision:1. Specify the exact nature of the disability and the necessary accommodations from the outset, so that the Board can plan inclusively.2. Enhance the work plan by incorporating 2 to 3 concrete contributions the candidate could make (e.g., advice on strategies for inclusive civic spaces for people with disabilities; amplifying the voices of local actors in Francophone Central Africa; supporting member engagement in restrictive environments).3. Explicitly acknowledge the lack of prior formal experience on a board and present the application as bringing a fresh perspective to the field rather than institutional continuity. 4. Further highlight the link between the organization's status with the United Nations Economic and Social Council (ECOSOC) and its multinational presence, and their potential as a network for Africa.Overall, this application brings geographical and experiential diversity. Further strengthening it by specifying the work plan based on realistic and specific roles for the board.	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;The Ken G. Morka Foundation Grassroots Movement – Chapter, holding UN-ECOSOC consultative status, can contribute practical grassroots experience from a Sahel/Central African context. Through community mobilisation, disability-inclusive approaches, and field programmes addressing poverty, education, nutrition and basic services, the organisation offers on-the-ground insights into civic space challenges and solutions in restrictive environments.
21	Mouhamed Maman	JEC(JEUNE ENGAGÉ POUR LE CHANGEMENT)	Youth organization	As a frontline health worker coordinating a community-based climate-health early warning system (SAP-CS) in the Sahel region of Niger, I welcome this nomination's focus on transitioning toward New Approach Methods (NAMs) for chemical hazard assessment. Harmonizing these methods globally is essential, but the workplan should explicitly address how NAMs will be validated and made accessible in low-resource settings where exposure pathways differ from those documented in higher-income contexts.In Sahelian communities, children and pregnant women face compounded exposure to agrochemicals, informally regulated pesticides, and contaminated water sources, often intensified by climate stressors such as erratic rainfall and drought-driven shifts in agricultural practice. Hazard data generated primarily in high-income	Communication or outreach;Our community network (JEC) and its climate-health early warning system (SAP-CS), active in Zinder and Diffa, could pilot local dissemination of NAM-informed hazard guidance to frontline health workers and agricultural communities, and contribute field-level exposure observations from routine nutritional and health screening missions to help ground the workplan's evidence base in Sahelian realities.

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				laboratory contexts may not capture these exposure realities. I recommend the workplan include:1) Capacity-building enabling national/regional laboratories in low- and middle-income countries to adopt and interpret NAMs, not merely receive externally generated data;2) Explicit consideration of children, pregnant/lactating women, and agricultural workers as priority populations, consistent with the Framework's own criteria on vulnerable groups;3) Mechanisms linking NAM-derived hazard information to community-level health surveillance and early-warning systems, so frontline health workers can translate hazard classifications into actionable guidance;4) Youth and community health worker engagement in training and dissemination, given their frontline role in detecting chemical exposure events.Bridging global chemical safety science with community-level health systems in vulnerable regions would strengthen both the rigor and the practical impact of this nomination.	
22	Sunil Gaikwad	Chipku Agri innovations pvt Ltd	Private sector	I support further work on this issue and recommend that the workplan place greater emphasis on practical, measurable pathways for reducing dependency on hazardous chemicals while maintaining effective pest management, food security and farmer livelihoods. Integrated Pest Management should be strengthened through pest monitoring, biological and behavioural control, pheromone-based technologies, physical trapping, digital pest surveillance and other scientifically validated alternatives.The workplan could benefit from clearer measurable indicators, such as reduction in unnecessary pesticide applications, reduction in exposure to highly hazardous pesticides, adoption of safer alternatives, residue-risk reduction, number of farmers reached, and improvements in pest-monitoring coverage.Implementation should involve governments, UNEP, FAO, WHO, research institutions, farmers, food businesses, technology providers and responsible private-sector organisations. Special attention should be given to affordable solutions for smallholder farmers and developing countries.I also recommend connecting farm-level chemical-risk reduction with the wider food chain, including storage, processing and household pest management. Monitoring and digital traceability can help demonstrate progress from pest detection through intervention to food-safety outcomes.Pilot projects in different crops and regions could generate evidence on effectiveness, affordability and scalability before wider implementation.	Capacity-building or training; Communication or outreach; Participation in a working group or community of practice; Data or information; Chipku agri innovations pvt ltd India, would be interested in contributing practical experience in Integrated Pest Management, pheromone and physical pest monitoring, sticky and solar insect traps, biological/natural approaches and AI-enabled pest surveillance. We would be interested in participating in pilots, field validation, farmer engagement and development of measurable approaches to reduce unnecessary pesticide interventions.
23	Hiromitsu Takaoka	Japan Soap & Detergent Association	Private sector	The use of NAMs in chemical safety assessment is a critical issue, both for the purpose of reducing animal testing and for refining the evaluation of impacts on human health in safety testing. We believe there is value in advancing initiatives toward regulatory adoption under globally	

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				harmonized guidelines and rulemaking.However, the goals and KPIs need to be designed to avoid duplication with existing OECD initiatives.	
24	Valeria Albanese	LAV (Lega Anti Vivisezione)	Non-governmental organization	We strongly support this Issue of Concern and its call for the Global Framework on Chemicals (GFC) to accelerate the transition towards New Approach Methodologies (NAMs) in chemical safety assessment.A coordinated international approach is essential to prevent the expansion of animal testing and to ensure that countries developing their chemical safety systems can adopt modern, human-relevant approaches from the outset. The GFC can play a crucial role by promoting international cooperation, capacity building, knowledge and technology transfer, regulatory harmonisation and dedicated investment in NAMs.The transition away from animal testing is not only an animal welfare objective, but also a scientific and public health priority. Human-relevant approaches, including advanced in vitro, in chemico and in silico methods, can provide mechanistic, scalable and timely information that is better suited to understanding human-specific responses to chemical exposure.Particular attention should be given to supporting developing countries, ensuring that access to modern methodologies, scientific expertise and regulatory capacity is not limited to high-income countries. International cooperation should help prevent new regulatory infrastructures from becoming dependent on outdated testing paradigms.We therefore encourage Parties to endorse this Issue of Concern and to explicitly integrate NAMs into the implementation of the GFC, including through clear objectives for regulatory acceptance, capacity building, data sharing and dedicated funding. This would strengthen the protection of human health and the environment while accelerating innovation and the progressive replacement of animal testing.	Communication or outreach;
25	DOLOBZANGA Arouna	DGECV	Government	We support this initiative that aims to protect thousands of people from the impacts of chemicals	Technical expertise; Capacity-building or training;Our country is part of the movement to protect people from any kind of harm to human health and the environment. We make it an absolute priority.
26	Kohjiro Hashizume	Japan Chemical Industry Association	Private sector	We support this proposal. We believe that the utilization of NAMs is an extremely important issue from the perspectives of reducing animal testing and refining the assessment of the impact on human health in safety testing.However, we hope that the following points will be taken into consideration as this proposal is implemented.We believe it is necessary to clarify the differences between this initiative and the efforts currently being undertaken by OECD and other organizations, as well as to identify what these existing initiatives have and have not achieved, in	Participation in a working group or community of practice;

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				order to avoid duplication and ensure coordination with them. In particular, we recognize that issues related to technological development goals and regulatory applications remain unresolved challenges.In promoting the harmonized use of NAMs, it is necessary to proceed in stages while taking into account differences in applications and endpoints and ensuring scientific consistency. We believe it is necessary to clarify operational guidelines to prevent a lack of data from leading to requests for additional animal testing.While we support the use of NAMs in the early stages of product development, we believe this should not negate the need for risk-based product development.	
27	Rebecca Ram	Lush Prize	Non-governmental organization		Communication or outreach; Technical expertise; Participation in a working group or community of practice; Other (please provide further details in the final comments section);
28	Hope Ferdowsian, MD, MPH	Phoenix Zones Initiative	Non-governmental organization	The nomination and workplan could include greater attention to human and animal ethics, including duties to nonmaleficence and the incorporation of the precautionary principle where evidence is uncertain.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;In-kind support; Upon request, we can provide relevant expertise in medicine, public health, and policy. We have led and continue to lead international and national efforts to advance human and animal research ethics and NAMs through education and outreach, research and innovation, and leadership and advocacy. We have collaborated with scholars, practitioners, and industry within the US and internationally on these issues.
29	Greg Sower	Humane World for Animals	Non-governmental organization	We support adoption of the harmonization of global efforts to transition to New Approach Methods (NAMs) as an Issue of Concern (IoC). Transitioning toward scientifically robust non-animal methods aligns with the Global Framework of Chemical's (GFC) vision of preventing harm from chemicals and waste while promoting sustainable innovation, transparency, and international cooperation. NAMs, including in vitro and computer modeling, can generate human-relevant safety data while reducing animal use, avoiding unnecessary testing, and speeding market access for sustainable chemistries.NAMs adoption supports GFC strategic objectives including the safe and sustainable management of chemicals, safer alternatives, international cooperation, and informed	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Data or information;We can support this initiative with our global expertise promoting NAMs for chemical hazard and risk assessment. We can enhance NAMs implementation by leveraging our established global and local relationships with scientific societies and government agencies. We can effectively

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				decision-making. This IoC converts these objectives into actions: harmonization with existing international initiatives, establishing a multi-stakeholder task force, building regulatory capacity, and development of guidance for the acceptance of NAMs. This IoC complements existing OECD, EU, and U.S. initiatives by providing a global platform for coordination and cooperation.There are also opportunities for developing countries. NAMs can help avoid costly and time-consuming animal-testing by leveraging shared data, harmonizing standards, and supporting international capacity-building efforts. These are benefits for regulatory efficiency, trade, and participation in global chemicals management.Challenges to NAMs implementation include incomplete coverage of toxicological endpoints, uneven regulatory acceptance, the need for greater confidence in NAM data, interpretation, and funding. These challenges justify coordinated global action through the GFC. This IoC addresses these needs by emphasizing adoption of NAMs where appropriate, standards for data interpretation, regulatory cooperation, and continued innovation. We strongly support this IoC to advance humane, effective, and globally equitable chemical safety systems.	identify promising NAMs and share developer and user experience to support implementation and alignment across jurisdictions. Our scientists and partners can encourage NAMs adoption in advanced and developing countries.
30	Tilo Weber	Academy for Animal Welfare of the German Animal Welfare Federation	Academia	We fully support both the nomination and workplan to implement New Approach Methodologies in the global framwork on chemicals.	Participation in a working group or community of practice; Communication or outreach;
31	Camilla Alexander-White	The Royal Society of Chemistry	Non-governmental organization	It would be useful to address how NAMs contribute to both hazard identification and risk assessment, particularly in their application in next generation risk assessment. Also stressing that the new models are species relevant and therefore human models could be in principle more protective than using animal models. There needs to be more on the economic potential of new business models and services to make the transition viable, the potential for global south to leapfrog to NAMs when developing new chemicals regulations is not copy EU REACH but look at the new science. International harmonisation on the use of NAMs in regulatory safety assessment will help international trade bilaterally between nations and regionally. But at all times consumer, occupational and environmental safety must remain paramount through rigorous risk assessment.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Dr Alexander-White also chairs the Regulatory Science Forum for the National Centre for the 3Rs in the UK, looking at regulatory acceptance of NAMs. There is also a NAMs network with 800 scientists signed up. And case studies from the cosmetics sector on augmented read-across strategies bringing in NAMs to provide new types of evidence to show similarity of chemicals in groups.
32	Russian Federation	Ministry of Industry and Trade of the	Government	The nomination addresses an important objective: modernising chemical safety assessment and increasing the use of scientifically validated NAMs. Existing infrastructure, including the OECD Test Guidelines	Other (please provide further details in the final comments section);The institutional format of the proposed “Multistakeholder

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		Russian Federation		Programme, Mutual Acceptance of Data, ICATM, EURL ECVAM and ICCVAM/NICEATM, already provides a strong basis for method development, validation, standardisation and regulatory acceptance. The GFC could add value through global cooperation, knowledge transfer and capacity-building, particularly for countries underrepresented in existing technical mechanisms.However, the evidence and examples are not sufficiently geographically representative. The proposed alignment analysis focuses mainly on EU, UK and US roadmaps; Asian regulatory experience and applicability to developing countries and economies in transition require stronger coverage. The workplan should distinguish national, regional and international initiatives.Responsibilities also need clarification. Organisations with established technical mandates are mainly listed as stakeholders to be approached, creating a risk of duplicated criteria, guidance and validation activities. NAM promotion should be limited to methods sufficiently validated and fit for the intended regulatory purpose.QSAR should be explicitly recognised as an important computational NAM. Its regulatory use should follow established OECD principles, including defined endpoints, algorithms and applicability domains, assessment of robustness and predictivity, and mechanistic interpretation where possible. Training for regulators on validated QSAR tools and broader access to recognised technical resources would be useful, rather than creating parallel validation systems or databases under the GFC	IoC Task Force / Advisory Group" is unclear and its mandate, composition and relationship with GFC governance should be specified. Given the substantial international infrastructure already in place for NAM development and acceptance, the nomination should demonstrate a distinct governance gap requiring a separate IoC rather than using existing GFC capacity-building and coordination mechanisms.
33	Jan Robinson	AnimalhealthEurope	Private sector	The description of impacts states that "Only 0.5% of chemicals on the EU market have been characterised (EU-PARC, n.d.)." This is slightly misleading: the cited PARC infographic states that 0.5% (500 out of 100,000 chemicals) have been extensively characterised for their hazards and exposures, whilst a further 10% (10,000) have been fairly well characterised. The remainder comprises 20% with limited characterisation of hazards and exposures and 70% with poor characterisation. The text should reflect the source more accurately, however the infographic itself lacks citation, and the figure of 100,000 total chemicals on the market differs from the text immediately above the infographic, which refers to a conservative estimate of 40,000 to 60,000. In light of these inconsistencies, it may be preferable not to use this reference.Pharmaceuticals should not be overlooked in the workplan activities, e.g. survey of global initiatives, engagement with existing international bodies. ICH (ich.org) and VICH (vichsec.org) are important organisations for harmonising the technical requirements for pharmaceuticals for human and veterinary use respectively. Global regulatory acceptance of NAMs is a key obstacle for animal health in	Technical expertise; Data or information; Participation in a working group or community of practice; AnimalhealthEurope and the global association Health for Animals are important industry stakeholders to consult for NAMs in assessment of veterinary medicines. AnimalhealthEurope developed its own roadmap towards phasing out animal testing in non-clinical safety assessments, and is a member of the European Partnership for Alternative Approaches to Animal Testing (EPAA). We also engage in the 3Rs programmes of the European Medicines and Chemicals Agencies.

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				particular, where the market is relatively small with high entry costs, meaning that access to an international market is critical for development of any new veterinary medicine. Note that target animal safety studies and clinical trials cannot be replaced by NAMs, although reduction and refinement remain possible.Data sharing is an aspect of the proposal. It should be noted that experimental data are typically not shared between companies, for financial and ownership reasons. The sponsor of an (expensive) study will not usually share data with other companies without due compensation (or at all, for competition reasons). A commonly-agreed procedure for data sharing must be established considering the needs of the data owner and recipient.	
34	Ndeye Maimouna DIENE	Pesticide Action Network (PAN) Africa	Non-governmental organization	The workplan is very informative and give more detail and information on the issue	Data or information; Participation in a working group or community of practice; Capacity-building or training;Technical expertise;PAN Africa can contribute in terms of capacity building, working group community practice, sharing information ect.
35	Emma Svensk	Swedish 3Rs Center and Swedish National Committee for the Protection of Animals used for Scientific Purposes	Government	The development, validation, regulatory acceptance, and implementation of New Approach Methodologies (NAMs) have the potential to contribute to improved chemical safety assessment and the replacement and reduction of animal use in line with the 3Rs principles by supporting scientifically robust and fit-for-purpose approaches to regulatory decision-making.We recognize that many important initiatives to advance NAMs are already underway at the international and national levels, including through OECD activities and initiatives in the European Union, the United States, the United Kingdom, and other jurisdictions. However, while chemical safety is a global concern, progress towards improved safety assessment approaches remains uneven across regions. Opportunities to develop, validate, and implement NAMs, as well as access to relevant expertise, infrastructure, and training, are not equally available worldwide.The Global Framework on Chemicals provides an opportunity to promote knowledge sharing, capacity building, and international cooperation on a global scale. Through these activities, scientific and regulatory advances related to NAMs can become more accessible to countries at different stages of development and implementation, supporting improved chemical safety and facilitating progress towards the regulatory acceptance and implementation of NAMs while reducing duplication of efforts.We consider the proposed focus on harmonization particularly valuable. Collaboration between regulators, researchers, industry, and other stakeholders will be important to build confidence in NAM-based approaches, facilitate regulatory	Communication or outreach;Subject to available resources, the Swedish 3Rs Center could contribute primarily through information dissemination and knowledge exchange, including sharing relevant developments, experiences, and resources related to the implementation of NAMs in chemical safety assessment through established stakeholder networks and communication channels.

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				acceptance where scientifically appropriate, and encourage the exchange of best practices and experience across regions. We therefore see value in the proposed activities which may complement ongoing efforts by OECD and regional initiatives while helping to ensure broader global participation in the uptake of NAMs for chemical safety assessment.	
36	Greg Carreau / Miranda MacPherson	Health Canada / Government of Canada	Government	Canada welcomes the proposal to develop an Issue of Concern (IoC) on NAMs. There are many groups working on NAMs globally, and the IoC could help bring groups together to make better use of limited resources and reduce duplication of work. Canada would welcome additional information on how this work will not duplicate existing efforts under the OECD or other organizations. The mapping of existing efforts and support from other organizations in the NAM space will be key to the success of this IoC.Canada would like to suggest possible reframing to focus the proposal more on the goal of transitioning to NAMs. Perhaps updating the title to "Harmonization of global efforts to transition to New Approach Methods in the assessment and protection of human, animal, and environmental health from hazardous chemicals" or something similar. We would also recommend adding text to the proposal to better reflect the current limitations of NAMs, particularly that science is not yet at a point where NAMs can replace all toxicity tests. This is especially true for complex endpoints where animal data may still be key in many cases. In addition, to improve clarity in the Overall Objectives section, the text "with human-relevant science" could be removed.	Technical expertise; Data or information; Participation in a working group or community of practice;Canada has various existing policy, regulatory, and research expertise on this topic and may be in a position to share technical advice with interested parties. Canada may be interested in participating in a working group or community of practice to improve collaboration, partnerships, and sharing of data and information.
37	Bazebizonza Francis Durand	Association des Jeunes pour l'Elevage, l'Agriculture et la Protection de l'Environnement pour le Développement	Non-governmental organization	Association des Jeunes pour l'Elevage, l'Agriculture et la Protection de l'Environnement pour le Développement a pour objectifs qui œuvrent dans le domaine des enjeux prioritaires de l'agriculture, le jardinage et le maraichage, de l'élevage, des ressources halieutiques en matière de la pêche durable, de l'apiculture, de l'aquaculture, de l'aviculture, de la sylviculture, de l'apiculture, de l'agroécologie, de la vulgarisation des conseils et de services agricoles, de lutter contre l'utilisation des pesticides, des produits chimiques et des déchets dangereux, de lutter contre la désertification des terres, du développement durable, de préserver des espèces migratrices de la faune sauvage, de conserver les ressources des forêts et la de flore, de gérer durablement la pollution de plastique dans le milieu marin et environnemental, de la justice climatique, de conserver la nature et la gouvernance forestière, de la viabilité des dispositifs des aires protégées des zones terrestres, marines et côtières, de la protection des écosystèmes et de la biodiversité marine, de réduire durablement la dégradation des terres, la désertification et la sécheresse, de protéger l'environnement contre les émissions et rejets anthropiques de mercure, de conserver la gestion durable des zones	L'agriculture biologique constitue un mode de production respectueux de l'environnement. Elle repose sur la non-utilisation de produits chimiques de synthèse, le recyclage des matières organiques, la rotation des cultures, la lutte biologique et le respect du bien-être animal. L'agriculture durable repose sur trois piliers, couvrant les sphères économique, sociale et environnementale.

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				humides, de redynamiser les secteurs de l'agropastoral et de la productivité agricole, de contribuer la gestion rationnelle des produits chimiques et des déchets dangereux, de lutter contre les dégèlements climatiques pour la défense globale de l'environnement.	
38	Sue A Leary	International Association Against Painful Experiments on Animals	Non-governmental organization	This nomination for an issue of concern under the Global Framework on Chemicals is well-developed, timely, and an important improvement of the GFC. It addresses a long-neglected area of concern in the practice of chemical testing: animal welfare. And it does so by addressing the need for global harmonization of test methods. Creating consistent use of, and access to, New Approach Methodologies, or NAMs, will facilitate modernization of testing facilities in countries that seek to regulate chemicals appropriately for their citizens. This can be expected to bring economic benefits as they align with important markets such as the European Union, United Kingdom, United States, and other countries that have declared intentions to phase out animal testing.The workplan is reasonable and the effort is likely to attract the expertise and resources needed to advance the issue.	Participation in a working group or community of practice;International Association Against Painful Experiments on Animals is willing to contribute however possible to this significant project.
39	Nancy Marangu	Chemichemi Foundation	Non-governmental organization	The workplan is well designed.	Capacity-building or training; Technical expertise; Communication or outreach; Participation in a working group or community of practice;The Foundation strengthens strategic partnerships.
40	Mark Jones	Progressive Veterinary Association	Non-governmental organization	The UN Global Framework on Chemicals (GFC), adopted in 2023, encourages countries to strengthen chemicals legislation, including through implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). While its objective is to improve chemical safety information and risk management, the GFC does not address the use, reduction, or replacement of animal testing or the development and implementation of New Approach Methodologies. As a result, implementation of the framework could increase demand for animal testing unless non-animal approaches are explicitly recognized and supported.	Technical expertise; Participation in a working group or community of practice;
41	Mbarumun Priscilla Achakpa	Women Environmental Programme	Non-governmental organization	The nomination should also provide a clearer mapping of relevant international agreements, organizations and existing initiatives, explaining what each currently addresses, the remaining gaps, and how the proposed work would complement rather than duplicate these efforts. Previous activities, lessons learned, scientific uncertainties and unresolved knowledge or implementation gaps should be more explicitly documented.The proposed workplan should identify specific lead and supporting organizations and assign responsibilities to governments, industry, civil society, academia, workers' organizations and other	Technical expertise; Capacity-building or training; Communication or outreach;In-kind support; Participation in a working group or community of practice;Women Environmental Programme (WEP) can provide technical expertise in gender-responsive chemicals and waste governance, community data, capacity-building, public awareness and policy advocacy. WEP can

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				stakeholders. Targets should be measurable and accompanied by baselines, indicators, data sources, milestones, timelines and reporting arrangements. Resource requirements and possible financing mechanisms should also be identified.Finally, implementation should include meaningful, adequately resourced participation by affected communities and civil-society organizations. Gender-responsive approaches, transparent information-sharing, capacity-building, community monitoring and the promotion of safer chemical and non-chemical alternatives should be integrated throughout the workplan.	also participate in working groups, facilitate stakeholder consultations, promote safer alternatives, engage vulnerable groups, and provide in-kind support through staff time, networks and community mobilisation.
42	Frankie Orona	Society of Native Nations	Non-governmental organization		Technical expertise;
43	TCHIGO Yovo Expédit	GREDD (Groupe de Recherche et d'Expertise en Développement Durable)	Non-governmental organization	Taking action in countries of the Global South, such as Benin, which is improving the legal framework to ban plastic bags	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Our organization is ready to conduct awareness campaigns
44	Ann-Lise MIKOLAJCZAK	IFPMA	Private sector	Pharmaceutical companies already apply NAMs in nonclinical R&D and support the shift toward NAMs. Three points.First, scope: it is unclear whether "pharmaceuticals," cited as a cross-cutting sector, means nonclinical drug-testing methodology itself, or knowledge transfer and environmental testing. We recommend distinguishing chemical safety assessment under chemicals legislation from nonclinical safety assessment for medicinal products, while preserving cross-sector knowledge transfer.Second, governance: ICH provides the binding, internationally harmonized framework for medicines' nonclinical testing and is not mentioned. ICH does not do what the nomination proposes for GFC - training, data access, and targeted funding for jurisdictions building regulatory capacity. Any technical content GFC facilitates should stay consistent with ICH-set standards, not create parallel guidance. The EU's own roadmap (published 1 June 2026; 22 actions across 15 domains, including "chemical pharmaceuticals") shows domain separation is already standard practice, with EFPIA coordinating directly with the Commission and EMA. GFC could instead coordinate with ICH and other global bodies rather than develop parallel pharma-specific guidance.Third, NAM readiness varies sharply by endpoint - acknowledged elsewhere for systemic, reproductive and carcinogenicity endpoints, but the impact section should reflect that variability. Replacing animal methods with a NAM is often not one-to-one across contexts (e.g.	Technical expertise; Data or information; Participation in a working group or community of practice; Communication or outreach;IFPMA would welcome contributing, particularly to align GFC work with ICH nonclinical testing frameworks and share pharmaceutical R&D experience with NAMs/3Rs, including EFPIA's 3-Basket prioritization approach and quantified case studies from its 3Rs reporting. Provided GFC work stays complementary to existing pharmaceutical regulatory science processes, we can help connect the Task Force with ICH and national regulatory authorities contacts.

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				industrial chemical vs. pharmaceutical use), in test time, cost and global regulatory acceptance. We recommend the Task Force include safety assessment professionals from industry and national regulators from the outset. The nomination should avoid generalized claims that NAMs are uniformly more predictive; suitability should be demonstrated for the relevant context of use.	
45	Dr. Brian Donlon	European Union and its Member States	European Union and its Member States	Numerous initiatives relating to the development and application of New Approach Methodologies (NAMs) are already underway. The proposal does not sufficiently clarify how the proposed Issue of Concern would avoid overlap with existing activities, nor does it clearly demonstrate the added value that designation as an IOC under the GFC would provide.The proposal should be strengthened by including what mappings, surveys, analyses, and discussions have been undertaken.This nomination would be strengthened if one of the IOMC organizations with experience in the field undertakes the preparatory work and is included as a lead organization.Although the proposal does describe some effects of chemicals on human health and certain groups, as well as the burden of current test approaches on industry, it is missing the impacts on the environment and animals, as well as any exposure data. This part could be improved by a stronger focus on the effects of the issue, so explaining the benefits of having more/better chemical characterization data and less animal testing.The proposal sometimes considers NAMs as new approach methods and sometimes uses non animal methods. Using New Approach Methods is the correct definition and ensures broader applicability of the issue proposed, therefore focussing on the improvement of human health and the environment as a whole instead of just on reducing animal testing.The work plan mainly focuses on capacity building whilst the nomination has a broad focus on knowledge sharing and building blocks for regulatory action. This could be better developed in the workplan.The engagement section requires further work. Although it states some organisations, it does not describe which types of engagement would be needed.	The comments of the EU and Member States at this point are shared to strengthen the nomination of the issue of concern. The EU and Member States have no formal position at this point on issues of concern.Recognition of an Issue of Concern ultimately should not be interpreted as a commitment to provide all means of implementation required.
46	Mattias Öberg	Karolinska Institutet	Academia	The initiative is timely and broadly well aligned with the need to modernize chemical risk assessment. However, the proposal would benefit from framing the transition primarily around improved protection of human and environmental health. Animal replacement is a key to that principal objective.NAMs offer clear advantages in terms of scalability, mechanistic information and, in many cases, human relevance. They address major limitations of current regulatory toxicology, including the large number of insufficiently assessed chemicals, mixtures and complex exposure scenarios. At the same time, the proposal appropriately	Technical expertise; Participation in a working group or community of practice; Capacity-building or training;Karolinska Institutet/IMM can contribute expertise in regulatory toxicology, NAMs and integration of mechanistic and human evidence. IMM also has extensive experience in education and capacity building through KI's international Master's Programme in

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				acknowledges that NAMs do not yet cover all relevant endpoints and that interpretation, regulatory confidence and translation into actionable information remain important challenges.A key issue is to distinguish hazard identification from quantitative risk assessment. International harmonization should therefore focus on common principles for scientific relevance, reliability, biological coverage, transparency and fitness-for-purpose, rather than prescribing identical methods globally.The initiative could also emphasize evidence integration. NAM data should be combined with epidemiology, biomonitoring, exposure science, mechanistic evidence and existing in vivo information within NGRA and weight-of-evidence frameworks. This is particularly important for mixtures, endocrine disruption and vulnerable populations.	Toxicology and in translating research into regulatory practice through national and international collaborations.
47	Anna Perutka	Project 1882 (Djurens Rätt)	Non-governmental organization	To achieve the long-term goal of replacing animal testing with NAMs, it might be beneficial to establish a specific timeline by defining milestones, such as replacing a certain percentage of a specific category of animal testing by a target year, in order to clearly demonstrate progress. In addition, it would be advisable to create incentives for the industry on a global level, such as regulatory advantages for companies that use NAMs.	Participation in a working group or community of practice; Communication or outreach;
48	Sara Brosché	IPEN	Non-governmental organization	While phasing out animal testing is an important objective, it does not appear to fall clearly within the definition and overarching mandate of an Issue of Concern (IoC) under the GFC. Several proposed actions, including regulatory acceptance, harmonized data requirements, and the transition to NAMs, seem to fall more appropriately within the mandates of specialized scientific and regulatory bodies, the OECD and national authorities. Given the current limitations of NAMs in assessing complex endpoints such as endocrine disruption, neurodevelopmental toxicity, multi-organ effects, and mixture toxicity, it also seems premature to promote global integration of this. However, one option could instead be to integrate this approach in one of the existing implementation programs, or as a new program. For this to be considered for GFC action, it is important that the proposal and workplan clarify what the anticipated changes in chemical life-cycle management following the cessation of animal-based toxicological testing are, including how chemicals will be assessed, regulated, and managed throughout their life cycle. Also, the recommendation should identify strategic approaches and appropriate safeguards to ensure the continued protection of human health, animal welfare, and the environment from toxic exposure during the transition to non-animal testing methods.	

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49	Amanda Ulrey	Institute for In Vitro Sciences, Inc.	Non-governmental organization	The Institute for In Vitro Sciences (IIVS) is pleased to offer its strong support for the nomination of this Issue of Concern under the Global Framework on Chemicals. The proposed work addresses a critical need: coordinated international action to accelerate the development, validation, regulatory acceptance, and practical implementation of New Approach Methodologies (NAMs) for chemical safety assessment. We agree that the Global Framework on Chemicals is well positioned to help reduce silos across jurisdictions and sectors. Chemical safety decisions increasingly rely on diverse evidence streams, yet differences in terminology, data expectations, technical capacity, and regulatory pathways can delay the adoption of scientifically sound methods. A coordinated GFC work program could complement existing national and regional initiatives by promoting shared principles, transparent performance standards, mutual learning, and greater confidence in NAM-generated information. This initiative could save time and resources across the industry by breaking down barriers between different groups through harmonization efforts. We also support the nomination's emphasis on capacity building. The transition to NAMs requires more than the availability of new technologies. It requires practical expertise in method selection, technology transfer, quality systems, integration of multiple testing approaches, and communication of method uncertainty and applicability so they are applied appropriately. IIVS has substantial experience providing hands-on laboratory training and technical assistance, including programs designed for regulatory scientists and testing laboratories in regions where access to specialized infrastructure or expertise may be limited.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;IIVS is a nonprofit scientific organization dedicated to advancing the use & regulatory acceptance of non-animal methods worldwide. We implement in vitro approaches, participate in validations, develop testing strategies, & train regulators and others in the United States and internationally. Areas we could support include method transfer; good in vitro method practices; validation; integrated testing approaches; & other strategies to support regulatory confidence and international acceptance.
50	Ahmed Yar	YOUNGO	Youth organization	From a YOUNGO perspective, we support the nomination and welcome its recognition of the need for coordinated international action. We recommend strengthening the workplan to ensure that youth, children and future generations are explicitly reflected throughout its implementation, rather than being considered only as vulnerable groups.The workplan should include clear, measurable and time-bound targets and indicators, consistent with the Global Framework on Chemicals' emphasis on measurable progress for issues of concern. Indicators should, where relevant, include age-disaggregated data and address differential exposure and impacts on children and youth. This is particularly important given the Framework's recognition that children and youth can be disproportionately affected by chemicals and waste.We further recommend establishing meaningful mechanisms for youth participation in the proposed multi-stakeholder working group and subsequent implementation activities. Youth engagement should go	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;YOUNGO can contribute by bringing youth perspectives, expertise and lived experiences into the implementation of the issue of concern. We can support meaningful youth engagement through consultations, awareness-raising, capacity-building and dissemination of accessible information. YOUNGO can also help mobilize young people across regions, facilitate dialogue between youth and other

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				beyond consultation and include opportunities for young people to contribute to priority-setting, implementation, monitoring and evaluation.The workplan should also address capacity-building, access to information, education and skills development, particularly for young people and stakeholders in developing countries. Where implementation requires additional resources, the workplan should identify financing and technical-support needs and connect them with relevant GFC implementation and funding mechanisms.We encourage stronger linkages with existing international processes and initiatives to avoid duplication and maximize impact, while ensuring that identified gaps are addressed. Regular progress reporting should include transparent indicators, opportunities for stakeholder review, and mechanisms to adapt actions where evidence demonstrates emerging risks or implementation gaps.	stakeholders, and contribute to monitoring progress and identifying emerging concerns.
51	Carl Hansell	Radboud Unveristy	Academia	This is a crucial aspect sorely lacking at the international and UN level. Technical advancements in NAMs needs to be recognised in UN frameworks in order for them to be relevant for the 21st century,	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Other (please provide further details in the final comments section);Our organisation, the SAFE consortium, could provide insights into the technical and social/insitutional factors which would accelerate the adoption and uptake of NAMs. It could also adress common pitfalls for their adoptiom.
52	Iman Fadhil Nassar	Ministry of Environment	Government	The Ministry of Environment in the Republic of Iraq commends the efforts made in drafting this vital proposal concerning the transition towards New Approach Methods (NAMs). In light of global environmental and health challenges, we believe it is essential to focus on the following points to ensure the success of the initiative:1. Capacity Building and Technology Transfer: Providing training programs and technical support to developing countries to enable them to adopt these modern techniques in chemical risk assessment, moving away from traditional, costly, and complex methods.2. Institutional Integration: Enhancing joint coordination among relevant authorities in health, environment, agriculture, and industry to ensure the smooth implementation of new policies at both national and regional levels.3. Time Flexibility: Accounting for differences in technical capacities and infrastructure among countries when setting timelines for workplan implementation, to ensure effective and inclusive participation without overburdening national systems	As the Ministry of Environment of Iraq (represented by the Chemicals Monitoring and Polluted Sites Assessment Department and the National Focal Point for international conventions), we can contribute by sharing national expertise, applying risk assessment guidelines, and actively participating in regional and international workshops to raise awareness and implement safe environmental standards

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53	Warren Casey	Director of the Office of Research Innovation, Validation, and Application (ORIVA) at the United States National Institutes of Health		I am the Director of the Office of Research Innovation, Validation, and Application at the U.S. National Institutes of Health. ORIVA launched this year to coordinate NIH-wide efforts to develop and validate human-based approaches across the agency's biomedical research portfolio, and serves as a hub for interagency coordination and regulatory translation for NAMs. For years, I served as the Executive Director of the Interagency Coordinating Committee on the Validation of Alternative Methods, which is comprised of U.S. federal agencies that require, use, generate, or disseminate toxicological and safety testing information. I write in support of the IoC seeking harmonization of efforts to protect human, animal, and environmental health against hazardous chemicals by transitioning to NAMs. NAMs increasingly offer the opportunity to improve safety assessments while overcoming limitations associated with animal-based tests. Momentum for increased investment and acceptance of NAMs has been building over time, and U.S. federal agencies are now embracing a thoughtful transition. Global harmonization is key to this transition, as companies test for the least common denominator, which defaults to animal testing when NAMs acceptance is not harmonized. Harmonization efforts are therefore crucial to ensuing that companies may employ the best available and modern science for mitigating risk.	
54	Mitsugu Saito	Ministry of the Environment, Japan	Government	NAMs encompass a wide range of methods at different stages of scientific maturity, validation and regulatory acceptance, and they cannot currently replace animal testing for all endpoints. The objective should therefore be to strengthen scientifically robust chemical safety assessment and the protection of human health and the environment, rather than to promote a uniform transition away from animal testing. The proponents and lead organizations currently identified in the proposal primarily represent animal welfare organizations. As such, the proposal does not yet demonstrate sufficiently broad cross-sectoral support within the GFC's multi-stakeholder framework. In particular, the proposal has been developed without confirmed substantive involvement from pharmaceutical and chemical manufacturers, which would be among the principal users of NAMs, or from relevant regulatory authorities and scientific experts responsible for assessing their regulatory applicability. Under these circumstances, the scientific credibility, regulatory relevance and practical feasibility of the proposal cannot yet be fully assessed. The GFC should focus on activities that complement, rather than duplicate, existing scientific and regulatory processes. On the other hand, the ISP-CWP, which was established this year, could contribute to a	Technical expertise; Data or information

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				broader review of the state of science and challenges, we may consider utilising this process.	
55	Laura Nazef	Office of Chemical Safety and Pollution Prevention United States Environmental Protection Agency	Government	The UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals (SCEGHS) already has a group titled: Informal Working Group on Non Animal Testing Methods. The NAM IWG is already addressing the use of non animal testing methods (NATM) for classifying health and environmental hazards under the GHS UNECE. This IWG is part of the Sub Committee's programme of work and is tasked with ensuring that NATM are consistently incorporated into GHS classification procedures. Given the UN's work in this space, we do not think additional UN work on NAMs is needed and could in fact be distracting from the important GHS adoption work. However, there could be room to incorporate implementation of NAMs within the scope of the GFC implementation programs once those programs are further developed. This would contribute to the achievement of a number of GFC targets, including Target B4: "By 2035, stakeholders apply appropriate guidelines, best available practices and standardized tools for hazard and risk assessment and chemical and waste management." The United States has stated in other fora that it will no longer reaffirm the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). We would like to see the GFC focus on achieving its strategic objectives rather than rely on vague buzzwords or blanket references to the SDGs.	

Annex 3: Comments received on pharmaceutical pollution and its effects on human health and the environment

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
1	Dr. PARTH GUPTA	RASID Lab, ADQCC and M42, Abu Dhabi, UAE	Government	The proposed nomination and workplan demonstrate a strong commitment to advancing environmental research on contaminants of emerging concern. To strengthen the submission, it is recommended to emphasize expertise in the detection and monitoring of pharmaceuticals and related compounds in environmental matrices, together with ongoing efforts in method development, validation, environmental risk assessment, and data generation to support evidence-based decision-making. The workplan should highlight research activities focused on understanding the occurrence, fate, and potential impacts of pharmaceutical residues in water and wastewater systems, while promoting scientific innovation and collaboration. Inclusion of measurable outcomes such as expanding analyte coverage, improving analytical performance, generating baseline environmental data, and disseminating findings through scientific publications would further enhance the proposal. Overall, the work represents a valuable contribution to environmental monitoring, sustainable water management, and public health protection, while supporting broader scientific and regulatory objectives.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;Our organization contributes expertise in environmental monitoring and applied research on emerging contaminants in water and wastewater. Future plans include expanding research on pharmaceuticals and other contaminants of emerging concern, advancing analytical methodologies, strengthening environmental risk assessment capabilities, and fostering scientific collaborations to support sustainable water management and evidence-based environmental decision-making.
2	Jakia Sultana	Environment and Social Development Organization-ESDO	Non-governmental organization	ESDO supports this nomination and recognizes pharmaceutical pollution as an emerging global chemicals management challenge with significant implications for human health, biodiversity, antimicrobial resistance, and water quality. The nomination is supported by a strong scientific evidence base and clearly demonstrates the need for coordinated international action.To strengthen the proposal, the relationship with the existing Issue of Concern on Environmentally Persistent Pharmaceutical Pollutants could be explained more explicitly, including how the proposed broader scope will complement ongoing work while avoiding duplication. The workplan would also benefit from additional medium-term, measurable outcomes, particularly for strengthening national regulatory capacity, environmental monitoring, pharmaceutical waste management, and wastewater treatment in low- and middle-income countries. Greater emphasis on technology transfer, sustainable financing, and capacity building would support equitable implementation. The proposal should also encourage stronger collaboration with the health, water, agriculture, and waste sectors to promote integrated lifecycle management of pharmaceuticals.	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support; Technical expertise;ESDO can provide technical expertise on chemicals and waste management, environmental health, and policy development. We are willing to participate in multi-stakeholder working groups, support capacity-building and training, contribute to communication and outreach activities, and provide in-kind support through technical inputs, knowledge sharing, and stakeholder engagement.
3	Bahakoula Mabidi Louis	Action Jeunesse pour le Développement	Non-governmental organization	Action Jeunesse pour le Développement œuvre dans le domaine de la justice climatique, de la gestion durable des forêts et de la faune, de la biodiversité marine, de la viabilité des dispositifs des aires protégées	Participation in a working group or community of practice; Financial support;Communication or outreach;Le

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				des zones terrestres, marines et côtières pour conserver les écosystèmes, de préserver et de conserver les espèces migratrices appartenant à la faune sauvage, de lutter pour la réduction des risques de catastrophe, de conserver la gestion durable des zones humides, de gérer rationnellement des produits chimiques, des pollutions plastiques et des déchets dangereux pour réduire les effets néfastes sur la santé humaine des micro-plastiques, de redynamiser les secteurs de l'agriculture, de lutter contre l'utilisation des pesticides, de vulgariser les services de conseil agricole pour assurer la sécurité alimentaire, de conserver la nature, la forêt et la faune sauvage, de protéger l'environnement contre les émissions et rejets anthropiques de mercure, de préserver des oiseaux d'eau migrateurs, de lutter contre les dégèlements climatiques, de gérer durablement la pollution de plastiques dans le milieu marin pour la défense globale de l'environnement.	Secrétariat de GFC, doit imposer un engagement et une participation significative des jeunes dans tous les processus liées à la lutte contre les pollutions plastiques, de gérer rationnellement des produits chimiques et aux déchets dangereux, de lutter contre le dérèglement climatique et la valeur les chaînes qui sont préoccupantes pour la santé humaine et l'environnement
4	TCHOKOUATOU Ghislaine Doralie	Action des Femmes pour une Planète Bio (AFEPB)	Non-governmental organization	The nomination presents a strong scientific rationale and clearly demonstrates the global and transboundary nature of pharmaceutical pollution. The proposed workplan is comprehensive and provides measurable milestones and long-term objectives.We suggest strengthening the nomination by placing greater emphasis on the situation in low- and middle-income countries, where limited wastewater treatment, weak regulatory frameworks, and inadequate pharmaceutical waste management significantly increase environmental and human health risks. The workplan could also include stronger provisions for capacity building, technology transfer, and sustainable financing to support implementation in these countries.In addition, more explicit recognition of civil society organizations, women's groups, Indigenous Peoples, and local communities as active partners in monitoring, awareness raising, policy development, and accountability would improve inclusiveness and ensure that affected populations contribute meaningfully to decision-making.The workplan would also benefit from incorporating actions to promote public awareness, safe medicine disposal, and healthcare professional education on environmentally responsible pharmaceutical use. Finally, greater attention to environmental justice, gender-responsive approaches, and the protection of vulnerable populations would further strengthen the proposed Issue of Concern and support equitable implementation across regions.	Technical expertise; Participation in a working group or community of practice; Data or information; Capacity-building or training; Communication or outreach; In-kind support;AFEPB can contribute through its experience in environmental protection, pollution prevention and community engagement in Cameroon. The organization can support awareness raising on the impacts of pharmaceutical waste, promote safe disposal practices, contribute to data collection and knowledge sharing, and help engage women, communities and relevant stakeholders in actions to reduce pharmaceutical pollution and protect ecosystems and human health.
5	Unax Lertxundi	Bioaraba	Academia		Technical expertise; Communication or outreach;

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6	Josep M. Guiu Segura	University of Barcelona	Academia	The nomination is scientifically strong, timely and well aligned with the Global Framework on Chemicals. I support broadening the persistence-based framing to encompass APIs, metabolites, transformation products and relevant manufacturing intermediates, while retaining a lifecycle and environmental-justice perspective. The objective also appropriately recognises that environmental protection must not compromise equitable access to essential medicines. I would recommend strengthening the operational role of healthcare systems, hospital and community pharmacists, prescribers, procurement bodies and patients. Actions could include environmentally informed formulary and procurement criteria, stewardship programmes, take-back systems, prescribing optimisation, education and ecopharmacovigilance.	Participation in a working group or community of practice; Technical expertise;The University of Barcelona, through Josep M. Guiu, could contribute expertise in clinical and hospital pharmacy, medicines governance, sustainable procurement, medication-use systems and professional education.
7	Claudia Orelio	Diakonessenhuis	health care: hospital	This subject is of major importance as clean (drinking) water is a valuable and scarce natural source that needs protection. The poposed framework can contribute to the protection of clean water.	Data or information; Daikonessenhuis is non-academic hospital in Utrecht, The Netherllands.
8	Michelle Bloor	University of Glagow	Academia	'Pharmaceutical pollution and its effects on human health and the environment' is without doubt an issue of concern. The proposal highlights concerns from both human and veterinary pharmaceuticals, so perhaps the title of nomination should also reflect that. When considering the 'cross-cutting nature', I would suggest that stakeholders associated with veterinary medicine and practice should be included and also dentistry. In addition, depending on country, access to pharmaceuticals for both humans and animals can be 'over the counter' and/ or via prescription, so this would also need to be taken into consideration.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;In-kind support;The possible contribution could be technical assistance, knowledge transfer and evidence underpinned by research, capacity building support, education and training, etc. In addition, a willingness to participate in the ad-hoc committee or working group.
9	Sadhna Sharma	Great Ormond Street Hospital for Children	Intergovernmental organization		Communication or outreach;
10	Matthias Albrecht	KLUG e.V.	Non-governmental organization		Participation in a working group or community of practice; Capacity-building or training;
11	sadsdaf	sdfsafd afs	Non-governmental organization		

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
12	Amy Booth	University of Sussex, Green Healthcare Hub	Academia	This is a well-written nomination that sets out the scale of the problem and the need for collaborative international action. I would like to offer a few suggestions:- Consider updating the evidence on the global occurrence of pharmaceuticals using the German Environment Agency (UBA) PHARMS-UBA database, which now reports almost 1,000 pharmaceutical substances (992 APIs, metabolites and transformation products) detected in the environment globally.- The workplan could place greater emphasis on engaging industry throughout implementation, particularly generic manufacturers and other supply chain actors, to ensure that proposed actions are practical.- There might also be earlier and more explicit involvement of national medicines regulators, environmental regulators and wider health system stakeholders (including health ministries, procurement bodies, professional organisations, healthcare providers, patients), as many of the proposed actions depend on regulatory and health system leadership.- Consider adding greater emphasis on preventing pharmaceutical pollution through reducing unnecessary medicine use, including medicines optimisation, appropriate prescribing, deprescribing where clinically appropriate, and disease prevention. This complements end-of-pipe and manufacturing solutions.- Finally, there might be value in referencing and aligning with the WHO Global Antimicrobial Resistance and Use Surveillance System (GLASS) and related WHO One Health initiatives, helping ensure complementarity with existing international programmes.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;Communication or outreach;The Green Healthcare Hub team has expertise in sustainable medicines and healthcare. We can contribute technical expertise on pharmaceutical pollution, sustainable medicines management and environmental sustainability in healthcare, alongside established networks across healthcare, academia, regulators, industry and civil society to support collaboration, evidence generation, sharing of best practice and implementation of the proposed workplan.
13	Nur azuza	Hdni	Government	Sangat ini daftar green forum	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;Financial support; In-kind support;Other (please provide further details in the final comments section);Bisakah bantu saya
14	Emmanuel Kiyaka	Green Interventions for Sustainable Towns (GIST) Kenya	Non-governmental organization	GIST Kenya welcomes this nomination and supports recognizing pharmaceutical pollution as an Issue of Concern under the Global Framework on Chemicals. The nomination presents a compelling case for expanding the scope beyond environmentally persistent pharmaceutical pollutants to address the broader range of pharmaceutical-associated hazards affecting human health, ecosystems, and biodiversity.The nomination effectively demonstrates the transboundary and multisectoral nature of the issue and its relevance to the Framework's objectives. We particularly welcome the emphasis on	Technical expertise; Data or information;Participation in a working group or community of practice; Capacity-building or training;Communication or outreach; In-kind support;GIST Kenya can contribute technical expertise, implementation experience, and evidence from community-based pharmaceutical waste

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				ecopharmacovigilance, environmentally sound manufacturing practices, and internationally harmonized approaches to environmental risk assessment.To further strengthen the nomination, we recommend that the workplan include more specific and measurable targets, indicators, and implementation timelines to facilitate monitoring of progress. Greater emphasis should also be placed on supporting low- and middle-income countries through technical assistance, institutional capacity strengthening, financing mechanisms, and technology transfer, recognizing that these countries often face the highest burden of pharmaceutical pollution while having limited waste management and wastewater treatment infrastructure.The workplan could also better recognize the role of local governments, healthcare facilities, civil society organizations, waste workers, youth-led organizations, and community-based initiatives in preventing pharmaceutical pollution through improved collection systems, safe disposal practices, public awareness, and surveillance. Strengthening community engagement alongside policy and regulatory interventions will improve implementation and long-term sustainability.Overall, we support adoption of this nomination and encourage a collaborative, One Health approach that integrates human, animal, and environmental health while promoting equitable participation of stakeholders across all regions.	management initiatives. We can share lessons from the SHARPS Project, support capacity building, participate in technical working groups, contribute field data and case studies, and facilitate stakeholder engagement, awareness raising, and policy dialogue in low- and middle-income country contexts.
15	Cristina Ciria	Servicio Madrileño de Salud (Spain)	Public Health Service	I would add education for actual and future prescribers at some point of the workplan.	I cannot speak for my organization. I think it may contribute in a working group or similar. This survey is from my individual position.
16	Hiromitsu Takaoka	Japan Soap & Detergent Association	Private sector	Resolving the outstanding issues under SAICM should be the highest priority. We should carefully consider any addition of new issues to avoid diluting the resources available for existing priorities.	
17	Sama Ghozlan	The International Pharmaceutical Students federation	Non-governmental organization		Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;Communication or outreach; IPSF is the International Pharmaceutical Students' Federation, representing over 600,000 pharmacy students and recent graduates with over 70 member organization across the globe. This topic is highly relevant with what we do in

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					advocacy and public health campaigns and we are happy to contribute.
18	Niels Lenting	Waterauthority Hoogheemraadschap De Stichtse Rijnlanden	Government		Technical expertise; Data or information;Our organization is responsible for water quantity and water quality of surface waters and treatment of wastewater in the province of Utrecht in the Netherlands. We receive and treat wastewater from hospitals, nursing houses and municipalities which all contain pharmaceuticals or metabolites of pharmaceuticals. We can provide knowledge and measurements of pharmaceuticals in sewer systems and surface waters in our management area.
19	Naveen Gautam	Global Forum of Communities Discriminated on Work and Descent	Non-governmental organization	I strongly propose that there shall be a discussion around marginalisation and work and descent based discrimination and also why and how chemical waste and toxic exposure impacts the marginalised including those facing work and desent based discrimination and indigenity impacts them a lot.	Capacity-building or training; Participation in a working group or community of practice; Technical expertise;
20	Russian Federation	Ministry of Industry and Trade of the Russian Federation	Government	Pharmaceutical pollution warrants international attention, but the workplan should be substantially revised to reflect the voluntary and coordinating nature of the GFC. In many jurisdictions, medicinal products and substances used in their manufacture are regulated primarily under dedicated pharmaceutical legislation. GFC work should therefore not create parallel approaches to API restriction or phase-out and should remain closely coordinated with competent medicines authorities.The workplan nevertheless envisages internationally agreed safe concentration benchmarks, mandatory ecopharmacovigilance in major jurisdictions, environmental standards covering at least 80% of global pharmaceutical production, and global phase-out pathways. These outcomes depend on national or regional regulatory decisions, recognised scientific procedures, financing, industry participation and enforceable implementation mechanisms. The workplan should distinguish between outputs the GFC can directly deliver and broader impacts dependent on external actors.The proposed phase-out of PFAS-type pharmaceuticals and highly persistent manufacturing intermediates requires a stronger scientific and regulatory basis. “Where therapeutic alternatives exist” is not sufficient. Before any phase-out pathway is considered, assessment should cover clinical necessity, therapeutic equivalence, approved indications and patient groups, national	The wording “EU, US, Canada and other progressive jurisdictions” should be reconsidered: “progressive jurisdictions” is value-based and unsuitable for a global initiative. Ecopharmacovigilance should instead be considered across relevant national and regional systems. The proposed international safe-concentration benchmarks also require a clearly identified competent lead body, scientific review procedure and mechanism for recognition and application.

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				availability, affordability, manufacturing capacity and supply-chain resilience. Access to medicines should be assessed ex ante and continuously, not only verified in 2041–2050 after phase-out measures planned for 2031–2038. Evidence that pharmaceutical pollution exists should also be distinguished from evidence that a particular regulatory intervention is appropriate and proportionate.	
21	Jan Robinson	AnimalhealthEurope	Private sector	The nomination describes pharmaceuticals primarily in terms of their negative impacts on the environment and on certain communities. Intentionally or not, it overlooks the essential role of medicines in improving human and animal health and of the benefit-risk calculation intrinsic to the approval of any medicine. In several regions, including e.g. the US, Europe, Canada and Chile, environmental risk assessment is a key part of the regulatory approval process for (veterinary) medicines and may result in a refusal of authorisation; pharmacovigilance requirements already include environmental safety. The focus should be on emulating this model in the rest of the world. Furthermore, actions proposed in the workplan should align - or at least not conflict - with existing or planned regulatory measures, and (especially) any exemptions and derogations established for medicines. Examples are established AMR programmes and targets (WOAH, FAO, WHO, individual countries), safe concentration benchmarks for surface water or phase-out pathways for PFAS-type pharmaceuticals. In the latter context, it should be noted that a “therapeutic alternative” is not merely an API of different chemistry within the same therapeutic category; substitution of a veterinary medicine is a complex decision requiring the expertise of veterinarians, which is also influenced by availability and marketing authorisation in different regions. The involvement of medicines regulatory agencies and industry will be critical.Finally, but by no means least: it is important to ensure that any action taken on pharmaceutical pollution does not impede or reduce access to human and veterinary medicines in any community, particularly those in LMICs. This should be a key principle throughout the issue and its work programme, not only as a retrospective action in Phase 3.	Technical expertise; Data or information; Participation in a working group or community of practice;It is essential for industry to be involved in all phases of the workplan. AnimalhealthEurope and the global association HealthforAnimals represent the innovative industry of veterinary medicines and can bring expertise in the environmental safety assessment of these products. We engage regularly with the various regulatory agencies globally; such agencies should also be involved if this is taken up as an Issue of Concern in the Global Framework on Chemicals.
22	Mirella Miettinen	University of Eastern Finland	Academia	I strongly support the nomination of pharmaceutical pollution as an issue of concern, with and appropriately broad definition. We have discussed the inclusion of pharmaceutical pollution in the post-SAICM framework in the article Miettinen M and Khan SA, Pharmaceutical pollution: A weakly regulated global environmental risk. RECIEL 2022;31:75-88. https://doi.org/10.1111/reel.12422.This nomination by University of York does not properly cover the reasons behind the need	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;It is very important to include pharmaceutical pollution as an issue of concern under the GFC, and I am happy

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				to include it as an issue of concern under the GFC. These include the fact that the issue of pharmaceutical pollution is not sufficiently addressed by existing legally binding treaties, and that the GFC could convene various international organisations, governments, and private actors and civil society groups. This aspects are included in Miettinen and Khan (2022). However, we also noted in our article that there have not been a real stocktaking as regards the EPPP issue under the SAICM, and that the reporting procedures under SAICM did not pay sufficient attention to issues of concern. Consequently, the workplan suggested in the nomination should also include concrete procedural aspects. Focus should be also on governance issues, not only on the production of scientific data. In addition, some outcomes, such as "ecopharmacovigilance mandated in major jurisdictions" are a bit superficial. It should also be kept in mind that the GFC is voluntary, not legally binding, and some activities/deliverables proposed in the nomination are drafted like they could result in legal consequences (e.g. "Agree phase-out pathways for PFAS-type pharmaceuticals... with national medicines agencies leading the actions).The overall objective in the nomination "to achieve an environmentally safe and just pharmacy", connected to the boundary of novel entities. The issue of pharmaceutical pollution should not be narrowed only to pharmacy or pharmaceutical sector, as it is a cross-sectoral environmental problem.	to contribute as a legal expert to any further work related to it, if included.
23	Greg Carreau / Miranda MacPherson	Health Canada / Government of Canada	Government	Canada welcomes the proposal to expand the scope of the existing issues of concern on environmentally persistent pharmaceutical pollutants to include pharmaceuticals that are non-persistent. This is consistent with the findings of the Environmentally Persistent Pharmaceutical Pollutants (EPPPs) - Assessment Report on Issues of Concern published in 2020.Canada has no suggested changes for the workplan or proposal at this time.	Technical expertise; Participation in a working group or community of practice;Canada may be interested in participating in a Community of Practice on pharmaceutical pollution (in line with the proposed workplan) to improve collaboration, partnerships, and sharing of data and information.Canada may be in a position to provide baseline information on national initiatives and provide technical review on developed materials.
24	Euripides (Rico) Euripidou	groundWork, Friends of the Earth South Africa	Non-governmental organization	In South Africa WWTW effluents are a major source of pharmaceuticals in the aquatic environment. Antibiotics and chronic medication (HIV/TB) are frequently detected in environmental matrices. Pharmaceuticals and their associated chemicals are released into the environment at every stage of the pharmaceutical lifecycle. These pollutants present a global pollution challenge with demonstrable adverse impacts to human health and the receiving environment. The	Participation in a working group or community of practice; Communication or outreach; groundWork's participation in global chemicals management goes back at least to the early 2000s and has evolved from campaigning on specific toxic substances, especially mercury and

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				emergence of antibiotic-resistant bacteria and ubiquitous presence of endocrine disrupting compounds in aquatic systems highlights the importance of this as an Issue of Concern.	persistent organic pollutants, to broader engagement with the international chemicals and waste governance system.
25	Shailand Gunnoo	Not Applicable (Individual Consultant)	Civil Society	This is for sure an issue of concern under the over-arching structure of the GFC. However from explanations of the proponents, the overall scope of pharmaceutical pollution seems reduced. The pollution being accounted for, is brought about by pharmaceutical substances and their metabolites after they enter wastewater streams and other water bodies such as rivers. Accordingly, the pollution inferred is limited to intended uses of pharmaceuticals and their detection in aquatic media. Such a scenario does not depict the whole picture of the pollution. Other types of prevailing pharmaceutical pollution, which may also be considered include: - disposal of obsolete / expired / unused pills, syrups, powders, and other forms medication obtained over the counter or from healthcare facilities. These have different environmental fates e.g. they can be leached into water bodies, absorbed by soils, carried to landfills, dumped in open air or released as hazardous pollutants if burnt.- release of toxic contaminants due to incineration of medical wastes from hospitals, clinics, old-age homes, etc.- disposal of customs-seized /adulterated/ counterfeit medicines.- disposal of used containers, bottles, ampoules, etc. which still hold residual pharmaceutical substances inside them.Instead of a large common / single CoP for Phase 1 of the implementation, smaller groups can be more effective as organisations don't have similar mandates, they operate under different jurisdictions, etc.For Phase 2, it is suggested to include settings with live animals e.g. cattle farms, poultry houses, shelter homes, etc. given that vet. drugs, biocides or other chemicals are commonly administered therein. Accordingly, monitoring of waters & soils nearby such settings would also determine the extent of the pollution. Moreover, it should be noted that the % reduction anticipated may not be easily achieved in case of outbreaks of animal / zoonotic diseases, i.e. fluctuations may occur at times.	Technical expertise; Capacity-building or training; Participation in a working group or community of practice;As a committed individual, I would be glad to contribute in discussions, meetings, project activities, report writings /reviews, etc.
26	Ricardo Carapeto García	Spanish Medicines Agency	Government	Safe, efficacious and affordable medicines are basic pillars of human health and welfare. New environmental requirements will impact on medicine availability, affordability and accessibility as they will lead to increments in the prices or even to the withdrawal of products with smaller margins. The impact of any measure must be carefully weighed before being implemented. Additional costs will be proportionally higher for generic industries (essential in the affordability) as they deal with narrow margin products. These effects could be particularly high in LMICs, which rely heavily on affordable generic medicines and	In-kind support;AEMPS would be glad to participate giving its regulatory point of view.

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				imported supplies Specific comments: Phase-out initiatives for PFAS is only supported in very exceptional cases. The substitution of one PFAS medicine by an alternative is not only linked to the indication, but to pharmacokinetic profile, adverse effects, mode of action… Substitution is extremely difficult.Ecopharmacovigilance: European pharmacovigilance already allows the notification of environmental incidents or contamination. If EcoPhV encompasses active vigilance (i.e. surveillance) it would move away significantly from the actual requirements.Green manufacturing standards definition is not clear; is not understood what is intended there. The specific actions should count with a wide consensus in pharma industry. Please note that innovative industry counts with more resources that generic industry to participate in international initiatives. Care should be taken to ensure a balanced representation as they have very different models of businesses.Any measure should be implement based on a risk assessment that considers benefits for the environment and risks for the availability. In case of measures for animal farming, the feasibility (operationl and economical) should also be taken into account. It is necessary to consider the availability aspects from the first phase, rather than deferring it for Phase 3.	
27	Ann-Lise MIKOLAJCZAK	IFPMA	Private sector	Document sent separately	Technical expertise; Participation in a working group or community of practice; Communication or outreach; Data or information;Document sent separately
28	Dr. Brian Donlon	European Union and its Member States	European Union and its Member States	The EU and its Member States recognise pharmaceutical pollution as an important global issue with implications for human health and the environment. We acknowledge the value of addressing emissions and impacts from pharmaceuticals throughout their life cycle and consider that the proposal raises important areas for further discussion.However, the proposal would benefit from further refinement and clarification before consideration by the IC. Its scope is broad and the overall objective could be more clearly defined, particularly whether it covers only active pharmaceutical ingredients (APIs) or also manufacturing intermediates, degradation products, metabolites and other aspects of the pharmaceutical life cycle. A clearer title and scope would facilitate understanding and implementation.The workplan could also be strengthened by focusing on practical, achievable short-term actions. Greater emphasis on concrete measures, including improved management of unused medicines and priority actions to be delivered before the next IC, would help demonstrate added value.Further clarification is also needed on governance, lead organisations,	The comments of the EU and Member States at this point are shared to strengthen the nomination of the issue of concern. The EU and Member States have no formal position at this point on issues of concern.Recognition of an Issue of Concern ultimately should not be interpreted as a commitment to provide all means of implementation required.

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
				timelines, resource requirements and technical feasibility. Questions remain regarding proposals such as the feasibility of establishment of a global database, how internationally recognised concentration benchmarks would be developed and how some longer-term objectives would be implemented. The proposal would also benefit from clarifying its relationship with existing initiatives and frameworks, including the existing Issue of Concern on Environmentally Persistent Pharmaceutical Pollutants, PFAS and EDC workstreams, and other ongoing regulatory and policy initiatives, to avoid duplication and maximise synergies.The EU and its Member States therefore encourage further revision and clarification of the proposal to enhance focus, feasibility, coordination and implementation.	
29	Sara Brosché	IPEN	Non-governmental organization	The proposal is well aligned with the GFC mandate, within the scope of the IoC definition, and an appropriate improvement of the existing Issue of Concern on Environmentally Persistent Pharmaceutical Pollutants. While persistence may be an important characteristic of pharmaceutical pollutants, the same policy and regulatory solutions are needed for a broader range of pharmaceuticals, irrespective of chemical properties. Also, all pharmaceutical pollutants of concern that must be addressed are not persistent. In this way, the proposal expands and complements rather than duplicates or replaces the existing IoC. Some clarifications of the proposal would be helpful. For example, it would benefit from clarification of how its broader scope would build on any action already undertaken or any existing work program. It is also not clear how civil society and labour unions can engage in the work. Finally, to further substantiate the case for addressing pharmaceutical pollution, the proposal could place greater emphasis on strengthening regulatory and policy oversight of the disposal management, and international shipment of expired medicines and pharmaceutical waste. Many countries, particularly those serving as pharmaceutical markets, may lack adequate regulatory frameworks to prevent waste from adversely affecting human health and the environment.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;IPEN will engage as relevant both on an international level and by supporting local partners working on these issues. We will contribute our expertise and experiences and look forward to discussing further how IPEN and civil society can help progress on this important issue.
30	Iman Fadhil Nassar	Ministry of Environment	Government	The Ministry of Environment inสนับสนุน the Republic of Iraq welcomes the nomination addressing 'Pharmaceutical pollution and its effects on human health and the environment.' Given the growing concerns regarding active pharmaceutical ingredients, transformation products, and antimicrobial resistance selection in aquatic and terrestrial ecosystems, we recommend focusing on the following core areas:1. Broadened Scope and Safe Benchmarks: Moving beyond a persistence-only approach to encompass the full spectrum of pharmaceutical hazards, and establishing internationally agreed safe concentration	As the Ministry of Environment of Iraq, we can contribute by sharing national water and environmental monitoring data, participating in the proposed global Community of Practice and stakeholder consultations, supporting the implementation of ecopharmacovigilance and green manufacturing guidelines, and raising national awareness regarding the

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				benchmarks for priority APIs and associated chemicals.2. Infrastructure and Wastewater Management: Supporting developing countries in upgrading wastewater treatment infrastructure and monitoring high-risk contamination hotspots, particularly from manufacturing and municipal discharges.3. Equitable Access and Just Transitions: Ensuring that strengthened environmental regulations and standards do not hinder equitable access to essential medicines, while maintaining active multi-sectoral collaboration among environmental, health, and agricultural authorities	environmental dimensions of pharmaceutical waste and antimicrobial resistance
31	Mitsugu Saito	Ministry of the Environment, Japan	Government	The proposal replaces and further develops SAICM's work on Environmentally Persistent Pharmaceutical Pollutants (EPPPs). In particular, if considering the breakdown products and metabolites of pharmaceutical active ingredients, and in some cases their combined effects, the proposal will cover the pharmaceuticals throughout their life cycle, rather than limiting the scope to persistent pollutants after their release into the environment, which is consistent with the objectives of the GFC and is welcomed. At the same time, human and veterinary pharmaceuticals are already subject to sector-specific regulatory and safety assessment frameworks. In addition, antimicrobial resistance (AMR) is also being addressed through the Quadripartite One Health Joint Plan of Action and related international processes. Coordination with these frameworks and other relevant GFC issues, including endocrine-disrupting chemicals where applicable, should be ensured. While Healthcare Without Harm is proposed as a lead organization, the nature and extent of involvement of relevant international organizations, including WHO, UNEP and OECD, remain unclear. Effective life-cycle management should protect the environment while maintaining equitable access to safe and effective medicines, particularly essential medicines. Active participation by pharmaceutical manufacturers, regulators, health professionals and other relevant stakeholders is therefore important. The workplan should distinguish voluntary GFC activities from actions requiring decisions by national pharmaceutical regulators, competent international organizations or infrastructure authorities, and set realistic and achievable priorities.	Technical expertise; Data or information Japan could share publicly available findings and experience from the Ministry of the Environment's work on the occurrence of pharmaceuticals and related substances in the environment, their effects on aquatic organisms, ecological risk assessment, and combined exposure to multiple chemicals. Relevant publicly available information and experience from Japan's AMR initiatives could also be shared.
32	Laura Nazef	Office of Chemical Safety and Pollution Prevention United States Environmental Protection Agency	Government	The United States has stated in other fora that it will no longer reaffirm the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). We would like to see the GFC focus on achieving its strategic objectives rather than rely on vague buzzwords or blanket references to the SDGs.	

Annex 4: Comments received on towards a broader approach on lead: expanding the scope beyond lead in paint

ID	Name	Organization	Stakeholder group	Comments or suggested revisions on the nomination or workplan.	Type of support the organization can provide
1	Jakia Sultana	Environment and Social Development Organization-ESDO	Non-governmental organization	ESDO strongly supports this nomination and welcomes the proposed expansion from lead in paint to a broader lifecycle approach to lead management. Our experience in Bangladesh demonstrates that while significant progress can be achieved through regulatory action on lead paint, major exposure sources remain, particularly informal recycling of used lead-acid batteries, contaminated consumer products, occupational exposure, and environmentally unsound waste management.The proposed workplan is comprehensive and builds on existing global initiatives. To strengthen implementation, it should place greater emphasis on supporting countries to develop integrated national lead action plans, strengthen enforcement capacity, expand blood lead surveillance, improve laboratory and monitoring capacity, and promote environmentally sound collection and recycling systems. Greater attention should also be given to technical assistance, technology transfer, and sustainable financing for low- and middle-income countries. Continued collaboration among governments, industry, civil society, academia, and international organizations will be essential to accelerate progress and achieve measurable reductions in lead exposure across the full lifecycle.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;ESDO can provide technical expertise and practical implementation experience from Bangladesh, including collaboration with government agencies, industry, and international partners on lead risk reduction and chemicals management. We can contribute to technical guidance, capacity-building, stakeholder engagement, communication, and multi-stakeholder working groups, while sharing lessons learned and supporting implementation through in-kind technical assistance.
2	RAKOTOARISOA DINA	MINISTRY OF ENVIRONMENT AND SUSTAINABLE DEVELOPMENT	Government	Madagascar se félicite de l'opportunité de commenter la nomination et le projet de plan de travail relatifs aux questions préoccupantes dans le cadre du Cadre mondial sur les produits chimiques. Madagascar reconnaît l'importance de ce processus pour renforcer la gestion rationnelle des produits chimiques et des déchets, protéger la santé humaine et l'environnement et promouvoir une action coordonnée.Madagascar soutient la poursuite de l'examen de la nomination tout en soulignant la nécessité d'une définition claire et fondée sur des données probantes, précisant le champ d'application, les sources, les produits chimiques ou groupes de produits concernés, les voies d'exposition et les populations vulnérables. Une attention particulière devrait être accordée aux impacts sur la biodiversité, l'eau, l'agriculture, la pêche, la santé publique et les moyens de subsistance locaux.Le plan de travail devrait être précisé sur le plan technique, avec des objectifs mesurables, des résultats attendus, des indicateurs, un calendrier, des acteurs responsables et des mécanismes de suivi. Il devrait aussi clarifier sa complémentarité avec les accords multilatéraux sur l'environnement et les initiatives internationales existantes.Madagascar recommande d'intégrer le renforcement des capacités, le transfert de technologies, l'accès aux laboratoires et aux	Participation in a working group or Community of practice;Madagascar pourrait contribuer en partageant son expérience, ses données disponibles et les leçons apprises en matière de gestion des produits chimiques et des déchets. Elle pourrait aussi appuyer les consultations nationales, participer aux échanges techniques, au renforcement des capacités et à la coopération régionale dans le cadre du Cadre mondial sur les produits chimiques.

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				systèmes de surveillance, la production de données, la sensibilisation, ainsi que l'accès à des alternatives plus sûres et abordables. Ces éléments sont essentiels pour les pays à ressources limitées.La participation des parties prenantes, notamment les gouvernements, le secteur privé, la société civile, le monde académique, les communautés locales, les travailleurs, les femmes et les jeunes, devrait être renforcée. Madagascar réaffirme son engagement constructif et soutient l'avancement de la nomination, sous réserve d'une clarification du champ d'application, des modalités de mise en œuvre et des résultats attendus.	
3	Dr. Debjani Mukherjee	K3 Martian Zenith Inc.	Private sector	K3MZ, strongly endorse expanding the global focus on lead beyond paint to address the broader industrial lifecycles of heavy metals. To maximize the workplan's efficacy, we suggest prioritizing active support for multi-sector implementation strategies that replace lead-based stabilizers, anti-corrosive heavy-metal compounds, and legacy industrial coatings within heavy transit (aviation, maritime, automotive) and infrastructure.The framework should place a stronger emphasis on promoting ready-to-position, advanced clean-chemistry formulations that serve as direct, non-toxic alternatives to legacy coatings. Additionally, the workplan should explicitly integrate decentralized, automated mechanical recycling into its strategy. Industrial waste streams frequently contain complex polymers mixed with heavy metals or lead-stabilized components that are highly energy-intensive to separate.By explicitly supporting decentralized machinery capable of safely upcycling these complex industrial wastes into high-durability eco-construction materials, the framework can empower localized public-private partnerships. This approach stops heavy metal degradation at the source and permanently traps hazardous synthetic inputs into structural assets like pavements and resilient habitats. We recommend that the final workplan design heavily encourages cross-disciplinary innovation models—such as translating extreme-environment space exploration resource efficiencies into terrestrial clean technology applications—to rapidly de-risk global supply chains and achieve the framework's 2030 safety targets.	Technical expertise; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;K3 Martian Zenith can contribute an CleanTech and SpaceTech platform to eliminate toxic elements We deploy ready-to-market, PFAS-free, and heavy-metal-free industrial formulations that replace toxic legacy coatings in transit. Additionally, we provide automated circular machinery that upcycles complex plastic waste into eco-construction materials. Our space sustainability innovations stem from a NASA initiative and are officially logged on the U.S. government iEdison platform.
4	RAKOTOMANANA Rila Albani	Ministry of Environment and Sustainable of Development	Government	Madagascar welcomes and supports the nomination of Lead as an Issue of Concern under the Global Framework on Chemicals. The nomination provides a strong scientific and policy rationale for addressing lead exposure throughout its life cycle and complements existing international efforts on lead in paint and hazardous waste management.We encourage the further development of the proposed workplan by:* Strengthening support for developing countries,	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;Since 2018, Madagascar has identified lead as one of its ten priority chemicals requiring

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				particularly through technical assistance, technology transfer, and sustainable financing to improve national capacities for lead monitoring, risk assessment, prevention, and remediation.* Promoting stronger coordination with relevant multilateral environmental agreements and international organizations, including the Basel, Rotterdam and Stockholm Conventions, the Minamata Convention, WHO, ILO and other relevant partners, to maximize synergies and avoid duplication of efforts.* Supporting national inventories and data collection on major sources of lead exposure, including used lead-acid batteries (ULABs), informal recycling, contaminated sites, e-waste, and other significant exposure pathways.* Encouraging awareness-raising and capacity-building for governments, local authorities, industry, workers and communities to reduce lead exposure and strengthen environmentally sound management throughout the lead life cycle.* Including measurable indicators to monitor progress, evaluate implementation, and facilitate periodic reporting under the Global Framework on Chemicals.	urgent action. As a member of the Global Alliance to Eliminate Lead Paint, the country has developed a national standard limiting lead in paint to 90 ppm and is currently adopting the implementing decree. Madagascar remains committed to sharing its experience and strengthening international cooperation on lead management.
5	Sandeep Dahiya	Phale India Foundation	Non-governmental organization		Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;
6	Lindita Molla	Publik Health Institute	Government	I have no major comments on the nomination or the proposed workplan. I support the planned activities and believe they provide a solid framework for achieving the expected objectives.I would encourage strong emphasis on communication and knowledge sharing throughout the implementation process. Regular dissemination of project results, exchange of experiences among participating countries and institutions, and effective stakeholder engagement will help maximize the impact of the initiative.In addition, active participation in technical meetings, workshops, and coordination events will be essential to strengthen collaboration, facilitate the exchange of best practices, and ensure that project outputs are translated into practical actions and policy improvements. Continuous communication among partners and timely reporting of progress will further contribute to the successful implementation of the workplan.	Participation in a working group or community of practice; Communication or outreach; Technical expertise;Our organization can contribute by supporting the promotion and communication of project activities and results through our national networks and stakeholders. We can facilitate the sharing of information, disseminate relevant outputs, and raise awareness among public health, environmental, and other relevant institutions. We are also willing to participate in communication activities, stakeholder engagement, and knowledge-sharing events to maximize the project's visibility and impact.

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7	TCHOKOUATOU Ghislaine Doralie	Action des Femmes pour une Planète Bio (AFEPB)	Non-governmental organization	The nomination is well prepared, evidence-based and presents a compelling case for recognizing lead as a broader Issue of Concern under the Global Framework on Chemicals. It clearly demonstrates the need to move beyond lead in paint and adopt a comprehensive life-cycle approach that addresses all major sources of lead exposure.I support the overall direction of the nomination and the proposed workplan. To further strengthen the document, I suggest placing greater emphasis on implementation at the national level, particularly in low- and middle-income countries. The workplan could include stronger provisions for capacity building of national authorities, technical assistance, sustainable financing, and support for civil society and community-based organizations, which play a key role in awareness raising, monitoring, and implementation.It would also be valuable to explicitly integrate gender equality, children's rights, environmental justice, and the protection of vulnerable communities throughout the workplan, recognizing that women, children, workers, and marginalized populations often bear a disproportionate burden of lead exposure.Finally, the workplan could benefit from additional indicators related to public awareness, stakeholder participation, and the elimination of informal lead recycling practices. These additions would strengthen accountability and help ensure measurable progress toward achieving the objectives of the Global Framework on Chemicals.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training;Communication or outreach; In-kind support;AFEPB can contribute through community awareness, policy advocacy, capacity building, and evidence generation on lead exposure, particularly among women, children, and vulnerable communities. We can support stakeholder engagement, promote safer alternatives, share field experiences from Cameroon, and collaborate with governments, NGOs, and international partners to strengthen implementation of the GFC objectives.
8	Caroline Theka	Environmental Affairs Department	Government		Technical expertise; Data or information;
9	Fahmi Binshbrak	Environment Protection Authority EPA	Government	The Republic of Yemen welcomes the nomination of lead as an Issue of Concern under the Global Framework on Chemicals and supports the proposed life-cycle approach to addressing lead exposure beyond lead in paint. The nomination highlights the significant public health and environmental risks associated with lead and the need for strengthened international cooperation.Yemen considers this issue particularly relevant for developing countries, where challenges related to used lead-acid batteries, informal recycling, contaminated sites, occupational exposure, and limited regulatory and technical capacities remain significant.To further strengthen the nomination and workplan, Yemen offers the following suggestions:* Clarify how the proposed activities will complement existing international instruments and initiatives, particularly the Basel Convention and relevant work undertaken by UNEP, WHO and other organizations, while avoiding duplication.* Include more measurable indicators, baseline information and intermediate milestones to facilitate monitoring and evaluation of	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Other (please provide further details in the final comments section);Support for pilot projects, national assessments, policy development and inter-agency coordination, subject to the availability of technical and financial assistance.

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				implementation.* Further strengthen references to biodiversity, ecosystem impacts and environmental monitoring alongside human health considerations.* Explicitly recognize the specific needs and constraints of least developed countries and conflict-affected States, including the need for sustained financial resources, technology transfer, institutional strengthening and technical assistance.* Promote environmentally sound management of used lead-acid batteries through strengthened collection systems, extended producer responsibility, safe recycling practices and support for the gradual formalization of the informal recycling sector.Yemen looks forward to continued collaboration under the Global Framework on Chemicals to advance practical, coordinated and adequately supported actions that reduce lead exposure while taking into account national circumstances and capacities.	
10	Achmad Solikhin	Economic Research Institute for ASEAN and East Asia (ERIA)	Intergovernmental organization	Kindly circulate the workplan through email so that we can revise accordingly.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Other (please provide further details in the final comments section);We are pleased if ERIA can be engaged in conducting studies or capacity-building on lead and other environmental health activities.
11	Simon Reddy	Lead Exposure and Poisoning Prevention Alliance (LEAPP)	Non-governmental organization	We support the GAHP nomination of lead as a comprehensive Issue of Concern and its move beyond lead paint to a full life-cycle approach, including its recognition of ULABs as the dominant global exposure source.We ask that the scope and work-plan also recognise drinking water contamination from legacy plumbing, fittings, and solder in public buildings (schools especially) as a distinct lead exposure pathway, currently mentioned only as a receiving environment (e.g. under SDG 6) rather than a direct route via in-building plumbing. Lead solder in copper pipework was used in the UK until 1987, and later or without any ban in many jurisdictions.A 2026 LEAPP case study of 11 English schools (illustrative only, not representative) found no routine lead/wholesomeness testing at any school; responsible authorities each treated it as another body's remit; and legionella risk assessments were repeatedly mistaken for lead-specific wholesomeness testing, which they explicitly do not cover.We request the nomination:1. Recognise this as a distinct pathway alongside ULABs, paint, cosmetics, textiles;2. Call for clarity between legionella and lead-specific water testing;3. Support	Technical expertise; Participation in a working group or community of practice;“LEAPP can contribute the full findings of its 2026 case study, ‘Safety of School Drinking Water in England,’ including underlying freedom of information correspondence with schools, councils, and regulators, to help scope further work on this pathway.We can also draw on our co-founder’s peer-reviewed World Plumbing Council (2015) work on lead-in-water risk from solder in copper pipe joints, to support a properly representative follow-up study with GAHP, regulators, or academic partners.”

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				representative research into prevalence, in the UK and internationally;4. Consider, under Target A1, assigning clear responsibility for lead testing in mains-only public buildings.Full case study available on request.	
12	Franklyn Connor	Ministry of Trade Etal / Bureau of Standards	Government	N/A	Participation in a working group or community of practice; N/A
13	Kolawole Oladele	Federal Ministry of Environment	Government	The nomination and workplan seems ok.	In-kind support; Participation in a working group or community of practice;
14	E. Odjam-Akumatey	Ecological Restorations	Non-governmental organization		Participation in a working group or community of practice; Capacity-building or training; Communication or outreach;
15	Hanns Moshammer	International Society Doctors for Environment (ISDE)	Non-governmental organization	I am fine with the workplan!	Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; ISDE is collaborating with GAHP but has also been active on lead pollution itself for many years.
16	Lolem Lokolile Bosco	Ministry of Health, Republic of Kenya	Government	Kenya is facing a serious but often invisible lead-poisoning crisis that disproportionately affects children and pregnant women, with contamination linked to industrial activity, e-waste, paint, batteries, cookware, and other products. In response, UNICEF Kenya supported the Ministry of Health from July to December 2025 to assess lead sources, health effects, risk factors, management capacity, mitigation measures, and community knowledge, with coordination led by the Division of Environmental Health and Sanitation and technical input from State Department divisions, Kenya Medical Research Institute's (KEMRI's) Air Pollution Centre of Excellence, and other partners.The assessment aimed to fill evidence gaps and strengthen multisectoral prevention and control strategies. More broadly, Kenya has formalized her engagement with the Child Environmental Health Collaborative through a letter of intent and commitment dated 29th July, 2026. This commitment is expected to help Kenya strengthen its child environmental health agenda, expand technical collaboration and knowledge exchange, and create opportunities for resource mobilization. The signed Ministry of Health commitment letter confirms readiness for	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;Significant contributions spanning technical and logistical support.

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				Kenya to participate and take part in the Global Child Environmental Health Conference in Beijing, China, from 23–26 November 2026, and the wider CEHC network.Kenya's health sector, in collaboration with UNICEF, has also in early 2026 requested technical and financial support from Coefficient Giving to undertake a national blood lead level survey.	
17	Jin Tada	UNISC International	Non-governmental organization	UNISC International strongly commends the nomination of high hazard chemical groups under the Global Framework on Chemicals, GFC. To maximize long term impact and equity, we propose three critical revisions to the proposed workplan:Integrate Localized Coastal Vulnerability Indicators: In archipelagic regions across the Asia Pacific, such as the Philippines and Indonesia, hazardous industrial runoff, microplastics, heavy metals, and persistent organic pollutants severely threaten marine ecosystems and coastal food security. Workplans should move beyond aggregate national economic data to mandate localized, ecosystem based risk assessments that reflect frontline impacts on small scale fishers.Operationalize Relational STEM: We advocate for a workplan framework that fuses technical chemical data with Indigenous and traditional ecological knowledge. Workplans should formally recognize community generated environmental observations as valid scientific inputs for monitoring chemical exposures, bioaccumulation trends, and localized ecological damage.Embed Intergenerational Justice and Youth Leadership: Drawing from historical lessons like the Minamata disease, chemical toxicity disproportionately impacts youth, women, and future generations. The workplan must establish participatory governance structures, including youth led community monitoring, public awareness campaigns to counter misinformation, and direct consultations with marginalized defenders.Finally, we urge the secretariat to ensure the workplan explicitly addresses multi hazard environmental risks, such as the compounding degradation caused when toxic chemicals interact with climate induced disasters and legacy unexploded ordnance, UXOs. Centering human rights, localized data, and youth empowerment within the workplan will guarantee an equitable and effective global chemical safety architecture.	Financial support; Data or information; Technical expertise;In alignment with our work alongside academic partners like the National Graduate Institute for Policy Studies, GRIPS, and UNITAR CIFAL Japan, as well as our active engagement within the Chemical and Waste Youth Platform, CWYP, for the BRS and Minamata Conventions, UNISC will design and host regional workshops. These initiatives will train emerging youth leaders, researchers, and local decision makers on hazardous chemical management, risk communication, and circular economy strategies.
18	Lenin Bueno	Ministerio de Medio Ambiente y Recursos Naturales	Government	Se considera que la nominación presenta una buena justificación técnica y científica, así como una adecuada alineación con los objetivos del Marco Mundial sobre los Productos Químicos. El enfoque de ciclo de vida constituye una fortaleza, ya que amplía la atención más allá del plomo presente en las pinturas e incorpora otras fuentes relevantes de exposición, especialmente el reciclaje de baterías de plomo-ácido, los productos de consumo y los residuos.Como sugerencia de	Participation in a working group or community of practice; El Ministerio de Medio Ambiente y Recursos Naturales podría contribuir mediante el fortalecimiento del marco regulatorio para la gestión ambientalmente racional del plomo, promoviendo acciones de

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				fortalecimiento, sería conveniente incorporar mecanismos más explícitos de apoyo a los países para desarrollar inventarios nacionales de fuentes de contaminación por plomo, sistemas de monitoreo ambiental y biomonitoreo, así como indicadores que permitan evaluar los avances en la reducción de emisiones y de la exposición de las poblaciones vulnerables. También resultaría útil promover una mayor articulación con las estrategias nacionales de economía circular, responsabilidad extendida del productor y gestión ambientalmente racional de residuos peligrosos.Se recomienda igualmente contemplar acciones específicas para fortalecer las capacidades institucionales de las autoridades ambientales y de salud, facilitar la transferencia de tecnologías y promover mecanismos sostenibles de financiamiento para los países en desarrollo. En términos generales, el Ministerio valora positivamente la propuesta y considera que contribuirá a fortalecer la cooperación internacional y la gestión integral del plomo.	inspección, vigilancia y cumplimiento ambiental. Asimismo, en el intercambio de información técnica y la coordinación interinstitucional con las autoridades de salud, industria, aduanas y gobiernos locales.
19	Shailand Gunnoo	Not applicable (Responding as an Individual Consultant)	Civil society	The term 'lead in paints' may be quite generic, the proposals need more in-depth investigations for the presence of lead in specific types of paints / colouring materials e.g. metallic paints, textile dyes, tattoo inks, and in consumer products like coloured candles, children products (e.g. toys, crayons), etc. Besides paints and batteries (which have high emphasis in the proposals), additional sources of lead should be considered, for instance, lead contamination through domestic water pipes, fishing gears or uncontrolled e-waste disposals. Instead of the UNEP to be the lead coordinating institution, the WHO can be in a better position for that role. The impacts of lead poisoning (affecting human health) seem greater compared to impacts due to environment releases. There are existing standards/limits of lead in drinking water or foods like vegetables and fish within relevant legislations. Moreover, for health surveillance of workers at risk, BLLs can be determined. The WHO has already produced communication materials for the purpose of the international lead poisoning prevention week.Appropriate technical and other capacities for laboratory testing of various leaded-products are needed. In LMIC countries, it may be difficult for routine lead monitoring, it is thus suggested that regional cooperation be encouraged by the GFC (at least one reference lab. can undertake testing for a region). Instead of the general 2026 – 2030 timeframe for proposed activities, the timeline can be set as target periods e.g. 1st quarter of 2027 or 2nd quarter of 2027 and so on. Moreover, a Gantt Chart would be helpful for following progress. A brief assessment of challenges that exist or may be anticipated for the smooth running of activities can be done, in terms of knowledge gaps, lack of capacity, little cooperation or	Technical expertise; Other (please provide further details in the final comments section); As a committed individual, I would be glad to contribute in discussions, meetings, project activities, report writings /reviews, etc.

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				other risks.Other relevant organisations as partners can also be included e.g data on products can be tapped from the WCO (HS Codes) and WTO (trade).	
20	serge ki	burkina faso FDA	Intergovernmental organization	We support broadening the focus on lead beyond paint. In Burkina Faso, people may be exposed to lead through various consumer products, including metal utensils, glazed ceramics, kohl/kajal, spices, and other everyday products. A comprehensive approach would help better address these different sources of exposure and guide prevention and regulatory actions. We also encourage strengthening the capacities of low- and middle-income countries, as well as promoting experience sharing and harmonization of analytical and surveillance approaches.	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; The Burkina Faso FDA is directly involved in the regulation and safety surveillance of consumer products. We are currently working with technical partners to identify and assess lead exposure from various consumer products, including product sampling, laboratory analysis, and capacity building. We can share our experience and lessons learned and contribute to technical discussions and, where appropriate, relevant data.
21	Nida Parks	Pure Earth	Non-governmental organization	Pure Earth strongly endorses this nomination to designate lead as a comprehensive Issue of Concern under the Global Framework on Chemicals, expanding international attention beyond lead paint to address the full lifecycle of lead exposure.For over two decades, Pure Earth has worked directly in the communities most affected by this crisis — investigating contaminated sites, testing blood lead levels, assessing contamination sources and running mitigation projects across Asia, Africa, and Latin America. Our field experience confirms what this nomination documents: informal used lead-acid battery (ULAB) recycling, along with contaminated spices, cookware, cosmetics and industrial waste, all contribute to the burden of global lead exposure in addition to paint. We agree that a comprehensive GFC designation would provide a unifying platform needed to formalize informal recycling sectors, harmonize transboundary standards, and mobilize the sustained financing that piecemeal interventions cannot achieve.Pure Earth is committed to serving as an implementation partner under this IoC, contributing our site-level data, expertise in remediation and other forms of mitigation, and government capacity building to help translate this framework into measurable reductions in childhood blood lead	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support; Financial support; Pure Earth is committed to serving as an implementation partner under this IoC, contributing our site-level data, expertise in remediation and other forms of mitigation, and government capacity building to help translate this framework into measurable reductions in childhood blood lead levels worldwide.

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				levels worldwide. We urge GFC stakeholders to adopt this nomination as a critical step toward ending preventable lead poisoning globally.	
22	Nahir Matus	Department of The Environment	Government	Fully supported.	Participation in a working group or community of practice; Data or information; In-kind support; Communication or outreach; As a developing nation, all possible contributions were selected in question 17.
23	Russian Federation	Ministry of Industry and Trade of the Russian Federation	Government	The problem statement and scope should be defined more clearly. The nomination identifies informal recycling of used lead-acid batteries (ULABs) as a major source of exposure and notes that batteries account for approximately 85% of global lead demand, but it does not quantitatively compare the contribution of different sources to human exposure. Such prioritisation is needed to justify a broad IoC and identify where international action would have the greatest impact. If ULABs are the dominant priority source, the workplan should place a clearer focus on the battery lifecycle, including technically and economically feasible alternatives, lifecycle impacts, cost and availability.The link between the objective of “Ending childhood lead poisoning by 2040” and the broader industrial, occupational, trade and product-related activities is also insufficiently demonstrated. Either child-focused pathways and indicators should be strengthened, or the objective should reflect the broader population and lifecycle scope. The nomination identifies children, pregnant women and workers as vulnerable groups, but specific measures and indicators are developed mainly for children.The added value and governance of a new IoC also require clarification. The workplan states that participating organisations retain full independence and that there is no joint implementation or pooled accountability, while existing lead-specific mechanisms already operate internationally. The nomination should explain why these mechanisms cannot be strengthened or better coordinated instead of establishing an additional IoC, and clarify interaction with the existing Lead in Paint work and GAELP.	The proposed lead organisation is inconsistent: the workplan identifies GAHP, while the nomination proposes UNEP to oversee coordination and governance. This should be aligned. The division of responsibilities with the Basel Convention should also be clarified for trade and transboundary waste aspects. Activities already underway in 2026 should be distinguished from new activities dependent on an IC-1 decision and timelines adjusted accordingly.
24	Greg Carreau / Miranda MacPherson	Health Canada / Government of Canada	Government	Canada welcomes broadening the existing approach beyond lead in paint, leveraging existing international initiatives, avoiding duplication and notes the importance of focusing on specified and prioritized sources of lead pollution.While the nomination clearly describes the substantial global impacts of lead and need for expanding the scope, there are areas where the nomination could be strengthened further. A mapping of existing international initiatives (or stocktaking exercise)	Technical expertise; Data or information; Participation in a working group or community of practice;Canada has various policy, regulatory, and research expertise on lead, including on the development of human biomonitoring programs. Canada may be

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				would be helpful to better understand and illustrate limitations and gaps. Furthermore, Canada encourages the initiative to clearly articulate its added value by providing additional detail on mechanisms and approaches to facilitate and enhance coordination between the workplan activities led by various organizations. Also, additional considerations could be presented on ensuring broad representation, including participation from low- and middle-income countries, worker/labour sector, youth, academia, and other relevant stakeholders. Furthermore, the nomination focuses substantially on the informal recycling of used lead-acid batteries (ULABs); however it is not clear how this translates to the workplan in terms of prioritization, as well as the activities currently underway under the Basel Convention to minimize duplication of efforts. Canada looks forward to discussions on the nomination and workplan both during and beyond the GFC's First International Conference (IC1) to advance this important work.	in a position to provide guidance to support capacity building in low- and middle-income countries, and baseline information on national initiatives and provide reviews of new materials related to lead.Canada would also aim to leverage its participation in existing international initiatives and collaborative platforms for future engagement on lead.
25	Hemantha Withanage	Centre for Environmental Justice	Non-governmental organization		Technical expertise; Capacity-building or training; Data or information; Participation in a working group or community of practice; Communication or outreach; In-kind support;
26	Regarding General Lead Regulations	Japan Mining Industry Association	Non-governmental organization	・Used lead-acid batteries and other lead-containing secondary resources are widely traded across borders. In some regions, these materials are managed through informal collection, storage, and recycling practices. Where environmentally sound management is not ensured, releases of lead to the environment can occur, creating potential exposure risks for workers and local communities. ・Furthermore, scrap yards with insufficient traceability of material sources and informal recycling chains may distort the market for lead-containing secondary resources and undermine efforts to establish safe, transparent, and environmentally sound lead recycling systems. Addressing these challenges should be considered an important element of international actions on lead management.	
27	Aryan Singh	Ramya.Materials	Private sector	We would like to emphasize one of the nomination's perspectives on the "scientific uncertainties and gaps in understanding and/or action relating to the issue". The nomination correctly states that although there is an undeniable scientific consensus on lead's toxicity, a catastrophic "implementation gap" persists. Lead in paints accounts for only a fraction of global exposure, which we now understand to be dominated by the lead acid battery (LAB) sector. While exposure from sources such as paints, LABs, cookware, spices, cosmetics, etc. is well understood,	Technical expertise; Participation in a working group or community of practice; Communication or outreach;As a materials-science R&D company, we help manufacturers take new IP from research and product development through testing and plant setup. We can support development and validation of

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				data on source attribution, especially in developing countries, can be extremely poor. In our state of Goa, in India, environmental studies have found lead accumulation from iron-ore mining and shipping fuel in soil, water, air and food. However, Goa has never systematically studied lead exposure, so the health impacts of these less-understood sources remain unclear. We expect that communities in other developing countries also face similar challenges. In order to better understand the variety of sources and mechanisms that lead to lead exposure, it is absolutely essential to broaden the GFC's scope beyond lead in paint. The GFC can provide governments with the invaluable technical and financial support needed to study previously overlooked, or cumulative, low-dose lead exposure pathways.	technologies to measure lead in blood and the environment, and help manufacturers apply Safe and Sustainable by Design principles to lead-containing products. We also welcome collaboration on BLL testing, source screening, policy advocacy and community engagement initiatives.
28	Robert Tumwesigye Baganda	Tumwesigye Baganda	Non-governmental organization	The nomination of lead in paint as an issue of concern is both timely and essential. Lead exposure remains a significant public health challenge, particularly in low- and middle-income countries where regulatory frameworks are weak or enforcement is inconsistent. Children are disproportionately affected, with lifelong impacts on cognitive development, health, and productivity. Addressing this issue under the Global Framework will accelerate progress toward eliminating one of the most preventable sources of chemical exposure.We recommend that the workplan emphasize:Regulatory harmonization: Support countries in adopting and enforcing legally binding limits on lead content in paints, aligned with WHO and UNEP guidelines.Industry transition: Provide technical assistance and incentives for manufacturers to shift to safer alternatives, ensuring affordability and accessibility.Awareness campaigns: Strengthen public education initiatives targeting consumers, schools, and communities to build demand for lead-free products.Monitoring and compliance: Establish mechanisms for regular testing of paints on the market, with transparent reporting to build accountability.Civil society engagement: Involve NGOs, community groups, and indigenous peoples in advocacy and monitoring, ensuring inclusivity and equity.The workplan should also integrate cross-cutting considerations such as gender and human rights, recognizing that women and marginalized groups often bear disproportionate burdens of exposure. Coordination with existing multilateral environmental agreements and the Global Alliance to Eliminate Lead Paint will avoid duplication and leverage synergies.In summary, the nomination is well-justified, but the workplan would benefit from clearer timelines, defined milestones, and stronger resource mobilization strategies. With these refinements, the initiative can deliver measurable reductions in lead exposure and advance global commitments to a toxic-free future.	Participation in a working group or community of practice;PROBICOU can contribute by mobilizing civil society and community networks to raise awareness on lead paint hazards, supporting policy advocacy for national bans, and facilitating stakeholder engagement. With experience in environmental health campaigns and grassroots outreach, PROBICOU can strengthen monitoring, compliance, and public education, ensuring inclusive and sustainable elimination of lead in paint.

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29	Dr. Brian Donlon	European Union and its Member States	European Union and its Member States	The EU and its Member States recognise lead pollution as an important global issue. The proposal has a good focus on the effects on human health and pathways to human exposure, including on children, from a wider range of lead sources. It could potentially build on the current knowledge as well as support mechanisms, available resources (funding and staff) and partnerships of the IoC on Lead in Paint.The proposal could be strengthened by including:- Further clarity on the high impact sources to be included. For example, ULAB is raised in the proposal but is not specifically included in the workplan. Lead is restricted in many countries e.g. in batteries, toys and electronics, and these products could therefore be a good starting point- More information on which type of monitoring is envisioned to identify sources (e.g. product compliance, human biomonitoring), keeping in mind that creating connections between human biomonitoring data and exposure sources can be challenging.- More information on relevant activities or actions taken concerning lead acid batteries, including, for example, legislation on recycling- More information on the exposure pathways and impact on the environment and biodiversity, including any data on monitoring- More information on potential other sources of lead such as waterpipes, industrial emissions or lead used in fishing.The workplan appears very ambitious, especially the short timeline proposed up to 2030. It should build on the previous work undertaken on lead in paint, including existing knowledge and data sharing initiatives and established partnerships.It is not clear if the potential lead organisations support the general feasibility of the proposal and have the necessary means to implement it. WHO, UNICEF, and ILO are mentioned but so far are not included in the workplan.	The comments of the EU and Member States at this point are shared to strengthen the nomination of the issue of concern. The EU and Member States have no formal position at this point on issues of concern.Recognition of an Issue of Concern ultimately should not be interpreted as a commitment to provide all means of implementation required.
30	Sara Brosche	IPEN	Non-governmental organization	Lead exposure extends well beyond paint, and it is crucial to prevent exposure from all sources, including consumer products, contaminated food and water, industrial sources, contaminated sites, mining, smelting, artisanal aluminum cookware, and battery production and recycling. However, exposure prevention from different sources and exposure pathways require targeted solutions to be effective. This is why elimination of lead in paint has progressed: it builds on source specific action with guidance on effective solutions. Still, lead paint as its own IoC must be a priority also moving forward since, despite being one of the most preventable, it remains one of the most widespread sources of lead exposure in children. If elimination of lead paint cannot be achieved, where there is strong political support, well established solutions and guidance, and cost-effective alternatives widely available, it is unlikely that a broad IoC on lead would be successful. Instead,	Technical expertise; Data or information; Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; In-kind support;IPEN and its global network of over 700 public interest NGOs have worked to prevent lead exposure from paint and other sources for two decades and will continue to engage in this work contributing our technical, and policy expertise. In addition, it is clear from the lead paint elimination campaign that consistent local civil society engagement

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				additional action must be appropriately prioritized and utilize a phased and targeted approach rather than treating lead as a single, uniform life cycle issue. The proposal rightly highlights informal recycling of used lead-acid batteries (ULABs) as an important source of severe lead exposure. However, while this is one important priority for action, it will not solve the problem of the population-wide exposures that are driving the global burden of disease. Also, the significant exposures associated with manufacturing facilities and formal recycling operations must also be addressed. Finally, the workplan does not provide a clear path for coordinated action that is likely to lead to the intended outcome. It is focused on work and priorities of specific organizations, and lack clarity on engagement by governments, labour unions and civil society. It also lacks priority action on known sources and the crucial focus on prevention.	is crucial for success. IPEN partners will be key local actors to implement broader action on lead.
31	Ursula Gately	Medical Students for a Sustainable Future	Youth organization	We support the proposal as presented	Participation in a working group or community of practice; Capacity-building or training;We support the proposal as presented
32	Michelle Naccarati-Chapkis	Women for a Healthy Environment	Non-governmental organization		Participation in a working group or community of practice; Capacity-building or training; Communication or outreach; Data or information; Technical expertise;
33	Iman Fadhil Nassar	Ministry of Environment	Government	The Ministry of Environment in the Republic of Iraq welcomes the nomination 'Towards a Broader Approach to Lead: Expanding the Scope Beyond Lead in Paint'. Given the severe health and environmental consequences of lead exposure—particularly on children's neurodevelopment and adult cardiovascular systems—we recommend focusing on the following core areas: 1. Formalization of ULAB Recycling: Providing targeted technical and financial support to developing nations to formalize and regulate informal backyard smelting and used lead-acid battery recycling, which serves as the primary source of toxic pollution. 2. Consumer Product and Supply Chain Control: Enhancing oversight on 'hidden' exposure sources, including lead-polluted plastics in consumer goods, industrial coatings, and adulterated food products. 3. National Capacity Building: Strengthening national laboratory infrastructure, multi-source monitoring capabilities, and enforcing Extended Producer Responsibility (EPR) frameworks to ensure a smooth transition toward safe and sustainable alternatives."	As the Ministry of Environment of Iraq, we can contribute by enforcing national regulatory frameworks to eliminate lead in paints and consumer products, sharing national environmental monitoring data, collaborating with sector stakeholders to manage hazardous waste and battery recycling streams, and raising public awareness to protect vulnerable populations—especially children and workers—from preventable lead exposure
34	Dr. Mureed Kazim	Bahria University Islamabad	Academia	I strongly support the nomination “Towards a Broader Approach on Lead: Expanding the Scope Beyond Lead in Paint.” It correctly	Technical expertise; Data or information; Participation in a working

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				recognizes that lead exposure in low- and middle-income countries is linked to poorly regulated recycling and informal industries. The workplan should identify informal e-waste dismantling and used lead-acid battery recycling as priority exposure settings. These activities often occur in residential areas, exposing workers, women and children through contaminated dust, soil, air, water and take-home residues.The workplan should apply a source–exposure–health framework and use indicators beyond counts of policies and trainings. Suggested indicators include blood-lead surveillance in populations and hotspots; monitoring of lead in soil, dust, air and water; informal recycling clusters mapped and risk-assessed; facilities meeting environmental and occupational requirements; and contaminated sites controlled or remediated. Data should be disaggregated by age, sex, occupation and location.Formalization should not rely only on prohibition and enforcement. A just-transition approach is needed, including worker registration, technical assistance, safer shared facilities, health screening and alternative livelihoods. Extended producer responsibility, mandatory take-back systems, product and battery traceability, and stronger controls on transboundary movements should be incorporated.Informal recycling also causes combined exposure to lead, cadmium, mercury, chromium, brominated flame retardants and combustion by-products. The workplan should acknowledge mixture exposures while retaining lead reduction as its main objective. Universities and research institutions in developing countries should support biomonitoring, exposure mapping and independent evaluation. A baseline phase, country pilots, a mid-term review and quantified 2030 targets would make the workplan practical and accountable.	group or community of practice; Capacity-building or training; Communication or outreach;As an academic and environmental chemistry researcher, I can support end-to-end evaluation of informal e-waste practices, including baseline studies, pollution hotspot mapping, environmental sampling, exposure and health-risk assessment, and impact evaluation. I can also develop monitoring indicators, identify practical interventions and translate findings into policy recommendations, safer recycling practices, capacity building and context-specific roadmaps for developing countries.
35	Mitsugu Saito	Ministry of the Environment, Japan	Government	Japan recognizes the importance of expanding international action on lead beyond lead in paint and supports a comprehensive life-cycle approach, particularly to address documented risks associated with used lead-acid batteries and their environmentally unsound recycling. The nomination and workplan should clarify the added value of the GFC in relation to existing initiatives, such as the Global Action Plan on Lead Mitigation to be developed by WHO and the Partnership for a Lead-Free Future, and the roles of participating organizations in implementation and progress reporting. While the emphasis on preventing childhood lead poisoning is justified, the workplan should more clearly address community exposure and significant impacts on biodiversity and ecosystems. Sources of lead exposure affecting wildlife, including lead ammunition and fishing	Technical expertise; Data or information; Participation in a working group or community of practice. The Ministry of the Environment of Japan has supported UNEP-led capacity-building activities and regional consultations on lead in the Asia-Pacific, African, and Latin American regions. Drawing on this experience, Japan could share relevant knowledge on the domestic management of lead-acid batteries, as well as information on its broader approach to lead management,

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				tackle where relevant, should also be considered based on available evidence and national circumstances. Substantial evidence supports prioritizing used lead-acid batteries as a major source of lead demand, pollution and exposure. By contrast, the basis for identifying cosmetics and textiles as priority sources should be further substantiated, including their relative contribution to exposure, geographic distribution and availability of alternatives. Lead continues to serve important functions in certain products. Measures should therefore not require substitution solely on the basis that a product contains lead, but should be considered according to the risks associated with specific uses and exposure pathways. Such consideration should take into account the potential for releases and exposure throughout the life cycle, the effectiveness of containment, collection and recycling systems, and the safety, performance and environmental impacts of alternatives. The workplan should prioritize action on uses and life-cycle stages presenting demonstrable risks, while ensuring that other uses are soundly managed to prevent releases and exposure.	which combines regulatory measures with voluntary initiatives. Such experience could contribute to further work under the GFC as a multistakeholder framework.
36	Laura Nazef	Office of Chemical Safety and Pollution Prevention United States Environmental Protection Agency	Government	On the framing of this proposal, we would characterize the designation of lead as an IoC as an “important step forward” rather than “an urgent necessity.” We would also disagree with the characterization of lead pollution as "fundamentally transboundary." Transboundary pollution is considered to occur via air or water, not products. The GFC should be characterized as a multilateral platform that can help countries strengthen their regulatory approaches rather than something needed to close gaps. Furthermore, the proposal mentions the GFC’s “multi-sectoral governance”, but as a voluntary instrument, the GFC does not engage in governance. We would instead characterize this as a multi-sectoral approach. The proposal frames the GFC as a platform that facilitates efforts to “prevent the transboundary movement of hazardous waste.” This should be focused on the environmentally sound management of chemicals and hazardous waste. We do not support the current text regarding prevention of transboundary movement of hazardous waste. In many cases, such trade is necessary to ensure proper management, especially in cases where exporting countries do not have sufficient waste management capacity. Alternative text could read “ensure the environmentally sound management of chemicals and hazardous waste” or something along those lines. (Please also note that the use of	

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				“transboundary waste” terminology later in the proposal does not accurately reflect what the Basel Convention covers regarding transboundary movements of waste.) The proposal states that "International attention under the GFC is required to harmonize trade standards." There is no requirement for action under a voluntary instrument such as the GFC; how would GFC activities harmonize trade standards? The United States has stated in other fora that it will no longer reaffirm the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs). We would like to see the GFC focus on achieving its strategic objectives rather than rely on vague buzzwords or blanket references to the SDGs.	

Annex V. Additional written submissions received during the consultation