

Item 3(a) – Implementation Arrangements (Resolution V/8)

We would firstly like to thank Uruguay for hosting us here in Punta del Este for both the SPP and the GFC OEWG meetings.

Brazil welcomes the progress made in structuring the Implementation Programmes under the Global Framework on Chemicals and expresses appreciation for the coordination efforts led by the IOMC, including yesterday's workshop.

We see these programmes as essential tools to translate the Framework's ambition into concrete actions on the ground.

Regarding Implementation Programme 1, Brazil wishes to underscore the central role of risk assessment capacities in ensuring that national legislation on chemicals is not only adopted, but effectively implemented and nationally owned.

Without the ability to assess risk in a manner aligned with national circumstances—including patterns of use, exposure, and vulnerability—countries are left with limited tools to enforce their laws or to take informed regulatory action.

For many developing countries, structural challenges such as insufficient laboratory infrastructure, lack of toxicological data, and limited technical personnel remain major obstacles.

It is therefore essential that IP1 includes not only capacity building, but also support for technology transfer and infrastructure development, as indispensable enablers of regulatory effectiveness.

On IP2, Brazil supports the engagement of the private sector along value chains to reduce the use of hazardous substances and promote safer alternatives.

However, we highlight that the transition to safer technologies must not exacerbate existing global inequalities. Many modern solutions are protected by intellectual property rights, creating significant barriers to access in developing countries.

In this regard, IP2 should actively encourage collaborative mechanisms—such as voluntary licensing, open innovation platforms, and technical partnerships—to support the diffusion of affordable and effective alternatives, in line with the principle of shared responsibility and Target A7 of the Framework.

Finally, Brazil reiterates that the success of the Implementation Programmes will depend on the availability of dedicated and predictable financial support, particularly through the GFC Fund.

We thus encourage the establishment of targeted funding lines for project preparation, technical assistance, regional workshops, and institutional strengthening, so that these programmes can move from concept to meaningful and equitable impact.

Item 3(c) – GFC Fund (Resolution V/3)

Brazil welcomes the rapid operationalization of the GFC Fund and acknowledges the significant interest it has generated worldwide. The high number of proposals submitted in the first round reflects the relevance and demand for this financial mechanism.

However, the number of eligible proposals has far exceeded the resources currently available, highlighting the urgent need to expand the scale and the predicability of funding flows.

Moreover, Brazil underscores the importance of ensuring that the evaluation process under the GFC Fund is transparent, consistent, and applied in a manner that guarantees equitable access for all developing countries. To that end, it is essential that the criteria used to assess and select proposals be clearly communicated and uniformly implemented.

We would also recall the eligibility criteria stated under Resolution V/3, namely that developing countries and countries with economies in transition would be eligible for support, taking into account considerations related to geographic and sectoral balance.

In this context, Brazil supports Chile and cautions against the introduction of income-based classifications or other filters that may result in differentiated treatment among developing countries, particularly where such distinctions do not take into account the varied national circumstances and capacities of these countries. In our view, such classifications create new categories that were not multilaterally agreed, thus lacking both clarity and legitimacy. The effectiveness and legitimacy of the Fund depend on its ability to respond to the needs of developing countries in a fair and inclusive manner, in line with the principles of equity and common but differentiated responsibilities.

Finally, we must ensure that the Fund does not punish those countries that are unable to secure co-financing. Co-financing should not be a condition for exclusion, but rather a result of the Fund's ability to mitigate risk and catalyze broader investments. The ambition of the GFC targets must be matched with commensurate means of implementation, including concessional public financing. In our view, the Fund should act as an enabler, not as a gatekeeper.

Item 4 – Financial Considerations

Brazil welcomes the initiative undertaken by the Secretariat, in collaboration with the IOMC participating organizations, to assess existing financial flows and the financial needs associated with the implementation of the Framework, as mandated by ICCM5 Resolution V/3.

Building on this important effort, Brazil would like to ask the Secretariat about the possibility of including in the decision under this agenda item a request for the Secretariat, in collaboration with relevant stakeholders, to develop a comprehensive resource mobilization strategy, grounded in the findings of the ongoing needs assessment and fully aligned with Target E3 of the Framework.

Requests the Secretariat, in collaboration with relevant stakeholders, to develop a comprehensive resource mobilization strategy for the GFC Fund, grounded in the findings of the ongoing needs assessment and aligned with Target E3 of the Framework, for consideration of the next session of the International Conference.

Such a strategy should aim to ensure that adequate, predictable, and sustainable financial resources from all sources are identified and mobilized in support of national implementation efforts.

In this regard, we would like to underscore that while private sector engagement is certainly welcome and fundamental, Brazil emphasizes that public concessional financing remains a foundational element—not only to provide direct support, but also to de-risk investments, enhance the viability of national initiatives, and leverage additional resources through co-financing arrangements.

In many developing countries, where fiscal space is constrained, such support is not only beneficial but indispensable. Furthermore, concessional financing can play a catalytic role in promoting innovation and scalable solutions, ensuring that promising initiatives are not left behind due to lack of access to capital. Ultimately, the ambition embodied in the Framework will only be realized if it is matched by implementation pathways that are robust, reliable, and responsive to the realities of developing countries.

Agenda item 3(d) – Gender Action Plan (Resolution V/4)

Brazil expresses its support for the development of the Gender Action Plan under the Global Framework on Chemicals. We consider this an essential step toward ensuring that policies and actions in the sound management of chemicals are equitable, inclusive, and responsive to differentiated realities on the ground.

In this context, Brazil underscores the importance of using disaggregated data, including data that reflects differences across work environments, as a basis for evidence-informed policy design.

Many occupations with high potential for chemical exposure are predominantly performed by women—such as domestic work and informal recycling—yet often remain invisible in traditional data sets.

Addressing these knowledge gaps is essential to designing effective and targeted prevention strategies.

Brazil also highlights the value of promoting gender balance in the governance and decision-making bodies of the Framework.

Ensuring the active and equal participation of women at all levels—especially in the formulation, implementation, and monitoring of policies—will be key to achieving a truly inclusive and impactful approach.

Global Alliance on Highly Hazardous Pesticides (HHPs) (V/11)

Brazil acknowledges the progress made in the work related to the Global Alliance on Highly Hazardous Pesticides, as mandated by ICCM5 Resolution V/11.

This initiative has the potential to contribute to the achievement of Target A7 of the Global Framework on Chemicals if adequately funded, by promoting coordinated efforts to phase out HHPs in agriculture where risks are not adequately managed and where safer and more affordable alternatives are available.

Brazil emphasizes the importance of further clarifying the scope of the Alliance's activities in order to enhance its operational viability and ensure tangible results.

In our view, the Alliance could draw inspiration from the successful experience of the Global Alliance to Eliminate Lead in Paint, including through support for the development of legal and regulatory frameworks and the implementation of pilot projects aimed at replacing HHPs.

Given the ambition of the proposed objective, Brazil would also highlight that the success of the Alliance will depend on the mobilization of means of implementation commensurate with its goals.

We note with concern that the current draft operational framework, in paragraph 30 of INF 14, does not foresee dedicated funding for the Alliance, which may hinder its effectiveness, particularly considering the high costs associated with replacing HHPs with safer alternatives.

Many of these alternatives involve modern molecules that are often protected by intellectual property rights, which limits access in developing countries. Thus, we would highlight that target A7 mentions that alternatives to HHP must be both safer and more affordable and that it is in the mandate of the GFC to promote their availability.

In this context, Brazil believes that the Alliance should explore international cooperation mechanisms to ensure equitable access to such technologies, in line with the principle of just transition enshrined in the Global Framework.

Regarding the technical scope of the Alliance, Brazil would advise caution in making explicit reference to the technical criteria of the Joint Meeting on Pesticide Management (JMPM) for defining HHPs in the operational framework in paragraph 9 of INF 14 document.

Instead, we would suggest referring to relevant multilateral environmental agreements as guiding references.

This would grant the Alliance greater flexibility and legitimacy by recognizing the diversity of regulatory and institutional contexts across countries, especially considering that MEAs are legally binding and multilaterally agreed, which is not the case of JMPM.

In this regard, Brazil recalls that Decision RC-12/5 of the Rotterdam Convention invited the Joint Meeting on Pesticide Management to consider discussing limitations in specific criteria adopted by the JMPM, such as criterion 6, which further supports the use of broader and more adaptable language.

Emerging Policy Issues and Issues of Concern (V/5)

Thank you, Chair.

Brazil supports the continued consideration of lead as an Issue of Concern, in light of its well-documented impacts on human health, particularly among vulnerable populations such as children. We also welcome the “Partnership for a Lead-Free Future” initiative.

Brazil is advancing legislative efforts aligned with this goal and has currently a bill proposal under discussion in the National Congress bringing national standards closer to international best practices.

With regard to the CRP submitted by the Alliance, Brazil acknowledges the importance of addressing lead exposure in a comprehensive manner. However, we would appreciate clarification from the Secretariat regarding the procedural implications of the proposal.

While Annex I of the Global Framework outlines the process for the nomination, consideration, and adoption of new Issues of Concern—including the six-month submission deadline prior to the International Conference—it does not provide specific guidance on the procedure for expanding the scope of an existing Issue of Concern.

This process should provide sufficient time for stakeholders to assess the scope, implications, and proposed workplans. Moreover, from a socioeconomic perspective, we consider it important that any future recommendation related to restrictions on substances or products be supported by national-level impact assessments, particularly regarding the technical and economic feasibility of alternatives.

In this context, could the Secretariat kindly clarify whether the proposal is intended to be forwarded to the International Conference for formal consideration, or whether a different process is proposed.

Regarding hazardous substances in electrical and electronic equipment, Brazil would like to highlight the national draft resolution currently under discussion by the National Environmental Council, which aims to establish restrictions in line with the RoHS approach.

Finally, concerning the proposal to remove nanotechnologies and manufactured nanomaterials from the list of topics of concern, Brazil would recommend a cautious approach and respectfully request clarification on the technical basis for this suggestion, given the increasing use and potential risks associated with these materials.

Measurement Structure and Indicators (Resolution V/9)

Thank you, Chair.

Brazil would like to warmly thank the members of the working group on measurement and indicators for their dedicated efforts and the thoughtful work they have been carrying out. We recognize the complexity of this task and commend the approach that has guided the development of this structure. We would also like to express our appreciation to the co-chairs of the group for their leadership and for the clear and informative report they have shared with us.

Brazil is pleased to support the ongoing work, as outlined in Resolution V/9 of the International Conference, and acknowledges the value of a measurement framework as a key tool for tracking collective progress towards the targets of the Global Framework.

At the same time, we wish to gently reiterate the importance of ensuring that the indicators adopted are technically sound, feasible, and responsive to the institutional capacities of all countries. They should be grounded in accessible and verifiable data to allow for meaningful, transparent, and equitable reporting.

It is crucial that the framework enables countries to accurately reflect their national circumstances, without imposing disproportionate demands—particularly on developing countries.

Finally, with regard to the proposed indicators for Target A7, Brazil would like to suggest a small editorial refinement: replacing the phrase “regulatory and assessment schemes” with “regulatory and risk assessment schemes” in the indicator related to Parties to the Stockholm Convention. We believe this adjustment would improve clarity and ensure alignment with widely used technical terminology.

Health surveillance systems

Brazil welcomes Resolution V/10 on health surveillance systems and recognizes the essential role of health data in supporting the sound management of chemicals and waste.

In our national capacity, the Ministry of Health plays a key role with regard to our position in the chemicals and wastes area.

We believe this is a critical area that deserves greater attention under the Global Framework on Chemicals, and we would be pleased to see its further development through concrete initiatives.

In this regard, we believe it is worth mentioning that Brazil also supports the inclusion of a dedicated provision on health in the future international legally binding instrument on plastic pollution, underscoring the strong link between chemicals, waste, and human health.

Thank you.

Global Alliance

Brazil acknowledges the efforts to advance the Global Alliance on Highly Hazardous Pesticides and reiterates its commitment to achieving the objectives of Target A7 of the Global Framework.

That said, we are concerned that insufficient attention is being given to the practical challenges of promoting and ensuring access to affordable and safer alternatives. Many of these alternatives involve advanced technologies or modern molecules that are protected by intellectual property rights, which can limit their availability in developing countries.

It is essential that the Alliance explicitly addresses these constraints, and that it does not unintentionally reinforce technical or economic barriers that could widen existing inequalities. Concrete steps are needed to support the transition in a fair and inclusive manner, including through international cooperation, technology transfer and capacity-building, taking into account the three pillars, social, economic and environmental, of sustainable development.

With regard to the identification of HHPs, we believe the reference to the the Joint Meeting on Pesticide Management also known as JMPM criteria is not adequate, considering for example, the guidance provided by the Rotterdam Convention in decision 12/5, through which the Conference of Parties invited (JMPM) to discuss the use of Annex III of that Convention as a criterion for defining Highly Hazardous Pesticides (HHPs) under Criterion 6 of the Guidelines on Highly Hazardous Pesticides

Instead of this methodology, we are in favour to refering to the relevant multilateral environmental agreements, which, for instance, are legally binding, having then the needed legitimacy for national implementation. Moreover, it makes the process of identification more flexible, which matches the idea of keeping leaving to countries the task of making lists of HHPs, taking into account their realities and circumstances.

Brasil-Chile CRP on OEWG mandate

Thank you, Co-Chairs.

Brazil would like to briefly introduce a proposal we submitted together with Chile, and with support from Saudi Arabia. Our goal is to update and clarify the job of the Open-ended Working Group (OEWG) under the Global Framework.

First, we want to say that we see the OEWG as a valuable checkpoint. It gives us all a chance to look at how much progress we've made in putting the Global Framework into action. We appreciate this important role.

However, we also think the OEWG could do even more. If the OEWG had a stronger role in preparing for the International Conference, it could help us achieve more concrete results and move faster toward our goals. This is our main motivation for the proposal.

We've noticed that there has been some confusion about what the OEWG is supposed to do. For example, many working documents had sections called "Proposed Action." This made many countries—including ours—think we were supposed to negotiate and agree on texts, as it happens in other groups like this. But later, we learned that this was not the case.

We would also like to point out that the main decision that guides the OEWG (Decision II/6) says that the group should prepare draft texts for the Conference. It does not say that negotiations are not allowed. We think this lack of clarity should be fixed, so everyone knows what to expect.

Over the past two days, we've talked informally with many colleagues. Many have told us they feel the same confusion and frustration, which has also come up in some public comments. There is real uncertainty about what the OEWG is allowed to do.

We believe this is a good moment to improve how things work. Our proposal is based on successful examples from other international agreements, like the Basel Convention and the Montreal Protocol. In those cases, working groups are given clear tasks to prepare results that are then discussed and decided at the main conference.

We are very open to suggestions and would much appreciate to hear what other countries think. We know that only the International Conference can make the final decision. Our proposal simply asks the Secretariat to collect opinions from all interested parties and prepare a draft resolution, which could then be discussed and possibly adopted at the next Conference. Our goal is to start a constructive conversation about how to make the OEWG a stronger tool for putting the Global Framework into action.

With regard to the procedures to be followed, we believe these recommendations could be adopted by plenary, as happened earlier today with the summary of the co-chairs of the Program of Work, Staffing and Budget contact group, when plenary adopted a recommendation after the co-chair put the question to the meeting.

Finally, we want to underline how important it is to make the best use of our time and resources.

Many countries have traveled far to be here, often with limited budgets. This makes us even more convinced that the OEWG should deliver clearer and more practical results.

Capacity-building

Thank you, Chair.

Brazil welcomes the development of a dedicated capacity-building strategy under the Global Framework on Chemicals and recognizes its central role in enabling effective implementation, especially in developing countries.

As the draft strategy rightly points out, capacity-building is a long-term process. To succeed, it must be accompanied by adequate means of implementation, including predictable funding and access to technology on mutually agreed terms. In this regard, we would like to suggest that the final strategy includes a dedicated chapter on resource mobilization, with a focus on long-term and sustainable solutions.

Brazil also wishes to highlight that many developing countries continue to face severe structural limitations in this area. These include the absence of minimum laboratory infrastructure, the lack of consolidated technical institutions, and serious shortages of qualified personnel to carry out risk assessment and enforce regulations. These are not abstract challenges—they directly affect our ability to design and implement effective chemical safety policies.

Addressing these fundamental capacity gaps is key to ensuring that no country is left behind. We therefore encourage the GFC to support a strategy that is ambitious, inclusive, and realistic in matching expectations with the tools needed to achieve them.

Thank you.