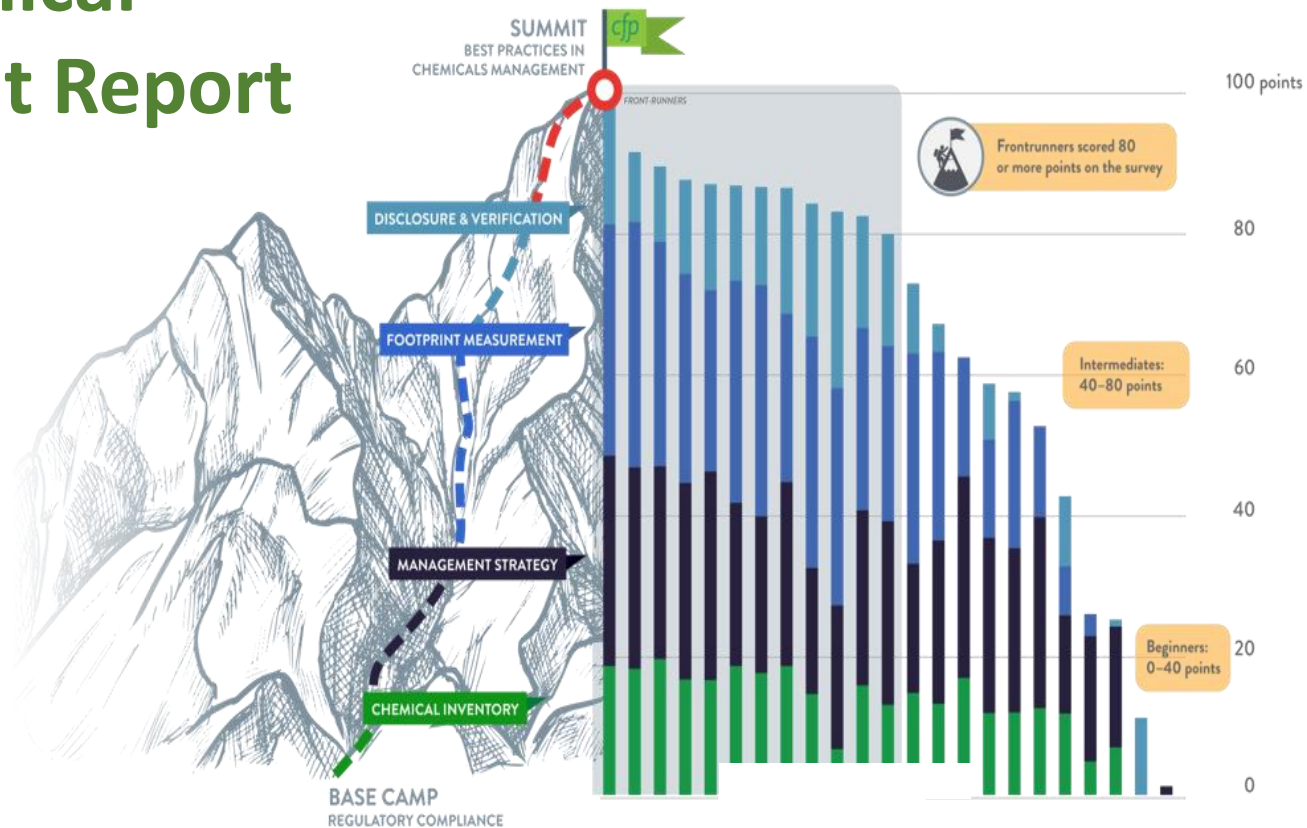


Chemical Footprint Reporting

Angela Pinilla, PhD
Senior Program Manager



7th Chemical Footprint Report



10.2 pending or anticipated regulations that may limit or restrict the use of the chemical in the future;

10.3 potential for environmental harm, but not harm to human health, the entity wishes to limit; and

10.4 being 'of concern' to consumers, customers, regulators or others (for example, non-governmental organisations or scientific researchers) even if the specific chemical or class of chemicals is unregulated.



10.4.1 Specific chemicals to discuss may include those found on the Chemical Footprint Project's Chemicals of High Concern List.

11 If the entity has identified specific chemicals for elimination or substitution, it may discuss the time line to achieve those goals, identify which products or product lines will be affected by the elimination or substitution, and provide an analysis of progress towards achieving its goals.

NATIONAL CHEMICAL POLICIES

The keystone of a new legal paradigm for chemical management would be a comprehensive approval process at the national level for all (existing and new) chemicals and plastics and all chemical uses, similar to that applied to pharmaceuticals. Chemicals, plastics, and chemical-based products would be allowed to enter and remain on markets only if rigorous, independent scientific assessment demonstrated that they were not toxic for persons of any age, especially children, at anticipated exposure levels.

To ensure that such information is trustworthy, all toxicity testing would have to be undertaken in laboratories that are free from financial conflicts of interest and not subject to contractual or other controls by industry sponsors. Manufacturers should be required to bear the cost of independent testing but not allowed to conduct it themselves.

National chemical policies should take into consideration findings from animal and mechanistic toxicology studies, which are highly predictive of human health risks, including risks to children.⁴⁹ To enable detection of a wide range of health effects, toxicologic studies need to exceed the minimal standards of Good Laboratory Practice and amplify study designs to include assessments of more recently recognized mechanisms of toxicity such as endocrine disruption. To enhance recognition of delayed consequences of

adopted in 2023.

Development and implementation of a treaty will require a permanent, independent science-policy body to provide expert guidance. This body should comprise prominent scientists, including physicians, with no financial conflicts of interest.⁵⁰ It could be modeled on the Intergovernmental Panel on Climate Change or the FDA's Tobacco Products Scientific Advisory Committee, or attached to the Inter-Organization Program for the Sound Management of Chemicals. Institutional mechanisms would have to be established to ensure that the relevant U.N. agency or secretariat responds to and acts on the advisory body's recommendations.



CHEMICAL FOOTPRINT REPORTING

Chemical footprint reporting is the business sector's strategy for documenting and reducing chemical hazards⁵¹: chemical manufacturers and consumer brands disclose information on the potential risks posed by chemical and plastic products over their life cycle, inventorying their products to identify chemicals of high concern, restricting use of those chemicals, monitoring use reduction, and transparently reporting results.⁵¹ Such reporting can clarify for potential investors the financial and legal risks associated with their investments. It can be required by governments, driven by shareholder resolutions, or mandated by a combination of the two.



CHEMICAL
FOOTPRINT
PROJECT



Angela Pinilla
angela@cleanproduction.org