



Brussels, 16 June 2006

Remarks and comments:

Session 2: Developing a Governance Framework for National SAICM Implementation

1. A crucial stakeholder group is workers and their trade union representatives. Workers are exposed to chemicals throughout the life cycle of a chemical or substance – in its production, its distribution, its use and its disposal. That is why the ICEM and its affiliates played such an important role in the development of ILO Convention 170 (*Chemicals Convention, 1990*) and in Convention 174 (*Prevention of Major Industrial Accidents Convention, 1993*) and in the development of the *Globally Harmonized System for the Classification and Labelling of Chemicals*.
2. SAICM is an extremely important international initiative, but to be able to build on it, there has to be effective national level implementation – something that can only happen with the full participation of stakeholders including trade unions representing workers handling and exposed to chemicals at work.
3. It will be very important for governments to ensure that the various Ministries that have responsibility for chemical safety are all involved appropriately in the SAICM process.
Otherwise there is considerable scope for confusion or outright competition between government departments and Ministers (remember the very different attitudes taken to the REACH proposals within the different government departments of a number of EU countries!)
4. There are a large number of chemical safety initiatives in countries around the world and one of the central aims of the national level SAICM process should be to give coherence to these whilst avoiding any duplication of effort or resources. For this reason it will be important for countries to undertake a wide-ranging audit of their national chemical safety activities in order both to identify gaps and to determine whether there are contradictions, redundancies, etc.
5. Governments should establish multi-stakeholder high-level committees charged with the responsibility of overseeing their national level SAICM process. Such committees should answer to the most responsible government Minister/Department.

Session 3: Ensuring Effective Stakeholder Participation: The Perspective of Industry and Public Interest & Labour Organizations

1. Unions around the world have a strong mandate to represent their members in ensuring that the risks to health and safety are removed or minimised. To do this effectively, trade unions need to be able to play a full role in developing and being involved in the processes and procedures developed at national level for the implementation of the SAICM Global Plan of Action. The best way to do this would be for national governments to establish multi-stakeholder SAICM forums including trade union representatives. Trade unions have also developed materials and training programmes dealing with chemical safety and these can be made available to those involved in the SAICM processes at the national level.
2. In order to ensure that such SAICM multi-stakeholder forums are both truly representative and accountable they should be based on clear and publicly available terms of reference and the members of the forum should be identified by name and according to the organisation or interest they represent.
3. Trade unions have a specific role to play in the workplace. Chemical workers are clearly in the front line, but they are not the only workers to be exposed to chemicals and it is often users further down the chain rather than workers at the production level who face the greatest hazards of chemical exposure (e.g. agricultural workers).
4. The ILO has relevant Conventions, Recommendations and Codes of Practice dealing with chemical safety. As these were developed through a tripartite process, they represent a very high level of common agreement between governments, employers and workers representatives and therefore an excellent basis on which to develop nationally and internationally coherent programmes of chemical safety.

Session 5: Review of Methodology and Guidance for National SAICM Pilot Projects

1. One of the most effective ways dealing with chemical safety is to ensure that those involved in the manufacture, distribution, use and disposal of chemical receive the best possible training.
2. Trade unions can provide training and an effective way to do this is in cooperation with management in order to ensure that both sides of industry are aware of their roles and responsibilities and importantly, how to develop and maintain the necessary structures for effective cooperation.
3. Effective training must be based on good source materials. In addition, even effective training will be inadequate if those who have been trained are unable to get chemical safety information when they need it and in a language that they understand. This means that *Manufacturers' Safety Data Sheets* (MSDS) need to be available to workers dealing with chemicals and the interpretation of such data sheets needs to be a fundamental component in any training of workers.