

Danish EPA Chemicals J.nr. Ref. momwe September 6 2013

Danish comments to the draft GEF-6 programming directions

Focal area strategy for chemicals and waste

We are very pleased with the revised draft, and commend the GEF for the work undertaken.

The only specific issues we would like to generally see better reflected in the text are those of the reduction of pollutants from emissions - for mercury especially in relation to coal fired power plants - and in relation to the mainstreaming of chemicals and wastes in different policies, in addition to mainstreaming in more general programmes, since chemicals play an important role in different economic sectors of the economy, including agriculture and industry.

Below please find our detailed comments in relation to these and a few other issues.

Comments on substance:

Section on Goal and objectives

Paragraph 27: First sentence, 2nd line: We suggest to insert "and emissions" after "production and consumption". One could say that emissions might be covered by "production" but in this context is would not seem to be the case.

The last part of paragraph 27, starting from "this could be achieved through" seems to put too much emphasis on partnerships, and further is not "goal language" but more one of the means, and we would propose it is moved to the "scope" part of the section.

Paragraph 28: First line – while we certainly understand the meaning, we would find it more accurate to after "regulated" add "or in other way covered", since some chemicals are not strictly regulated, for example unintentional emissions of POPs.

Paragraph 29: In the 4^{th} sentence on the second main area, emissions should be explicitly mentioned.

Last sentence, second to last line: We suggest to insert ",and substitute to, better" between "private sector to find" and " alternatives".

In the last line we would suggest to replace "innovative" with "effective" or perhaps reformulate to "effective and where appropriate innovative", since we find it key that the approaches are effective.

Paragraph 31: Last sentence third to last line: We suggest to insert between "be" and "developed" the words "deployed, and where necessary", since some effective techniques and technologies already exist.

In CW Figure 1 on page 78; paragraph 43, heading on program 3 (page 81) and finally paragraph 51, little (c) (likely also consequential adjustment of table 3): In the box on program 3 we suggest to insert "policies" after "planning processes", since we find this aspect important, also in in relation to sector policies, considering the many economic sectors where chemicals play an important role. We would therefore also propose "and sector policies" inserted in paragraph 43, 5th line after "development agenda". In the heading for program 3, we would propose to insert ", policies" after "processes". In "outcomes", under (c), we propose to insert "and policies" after "planning frameworks".

Paragraph 49, second to last line: The text says that a special programme under the integrated approach has been adopted, but this is not the case, although a draft has recently been outlined at a meeting in Bangkok - with some brackets in it. Decision 27/12 foresees a programme, but it will only - at the earliest – be adopted at the UNEA in June 2014. We therefore suggest to replace "adopted" with "foreseen".

CW Table 2 on page 87: In program 5, coal fired power plants should be explicitly mentioned.

Comments of an editorial nature:

Paragraph 19 first line: "Sectors" should be singular

Paragraph 20, first sentence: "Another barrier for the slow pace". Should this not be another reason for the slow pace?

Paragraph 46, page 80, first bullet (2nd line from the top): "Economic" should be without an "s" in the end.

Paragraph 56:

There seems to be some overlap between indicators (i) and (iv). Indicator (v): Something seems to be missing, perhaps "reduction in use of"??

Paragraph 57, 5th line: An "a" seems to be missing in front of "long".

The tables 2 and 3 should probably be "table 1 and 2" since the first is a "figure".

CW Table 3 on page 88, introduction. It here says 10 new POPs have been added. The number should be 11, see also paragraph 9.