Comments from Denmark on the Chemicals strategy, including in relation to questions for the GEF6 to maximize GEF's future impact.

We welcome the new draft strategy and find many good elements in it, especially the broader focus on chemicals and wastes, taking into account UNEP decision 27/12 on an integrated approach to financing for chemicals and wastes, and the recently published UNEP Global Chemicals Outlook. We think the integrated approach should be included more explicitly in the focal area strategy.

We stress the need to allocate more funds to the chemicals and waste area in light of the agreement of the Minamata Convention on Mercury and the decision to have the GEF as its financial mechanism, as well as the UNEP decision 27/12 on the integrated approach mentioned above. Therefore, as well increasing the amount of funds going to the area in absolute terms, the relative share of GEF funding going to this area should be increased.

Regarding options for GEF6 to maximize GEF’s future impact: We support a program based approach with a more multifocal and cross cutting approach to maximize GEF’s future impact. There are many overlaps with other GEF focal areas. One example is with the climate area, since emissions from power production facilities include mercury and pops. Another is international waters, which is already to some extent taken into account eg. in relation to mercury. Finally, a biodiversity angle is also relevant in relation to POPs and to chemicals and pesticide formulations covered by the Rotterdam Convention.

We would also support changes, which will better accommodate the needs of the Least Developed Countries, especially as regards accessibility, including co-financing and co-financing rate, turn around times and assistance in formulating projects, focusing on projects related to the implementation of national implementation and action plans.

Focal area strategy
General comments
We think the strategy should be renamed the “Chemicals and Waste Strategy”, to reflect clearly and consistently incorporate the increased focus on an integrated approach to financing for the chemicals and wastes area, in accordance with UNEP decision 27/12.

Some paragraphs contain goals as well as proposed means, and we would propose that the issues are kept separate.

We would propose to consider elements in the Rio+20 outcome document “the Future We Want” and also the recommendations from the Global Chemicals Outlook for inclusion in the strategy, and, especially for the Stockholm Convention, carefully consider the guidance which will come out of COP6. Also, mercury issues should be clearly included, and the content of resolutions to be taken at the Diplomatic Conference for signing the Minamata Convention in Japan in October taken into account.
Indicators should as far as possible be outcome oriented.

**Long term goal**
Para 23. We propose to clarify in the text that the long term goals are in accordance with the WSSD chemicals goals and the Rio+20 reaffirmation on chemicals and wastes, and the reaffirmation on the goal, including waste, in “the Future We Want”.

Also, the UNEP decision on an integrated approach should be taken into account, to help improve capacity for mainstreaming and industry involvement, to ensure the sustainability of capacity built and projects undertaken through financing from these sources (national budgets, cost recovery from industry and similar). Building chemicals and wastes into sector policies and strategies and development strategies/PRSPs would also being part of this.

**Scope of the GEF 6 strategy**
Para 24.
Also here the Global Chemicals Outlook recommendations and UNEP Decision on an integrated approach should be taken into account better.

The issue of involving Stockholm and Basel regional centres to increase their capacity should be considered.

Para 25: We fully support that “This Strategy seeks to create a fully integrated focal area for chemicals and waste” that is responsive to the instruments shown in Box 1, including SAICM.

**Mercury**
The work under GEF 6 on mercury should focus on promoting ratification, including putting place the necessary regulation and early assessment, while further work could also go on, resources permitting, also in relation to multifocal projects and programmes.

**Further, specific comments.**
Due to the work in relation to the EXCOP/triple COP meetings on chemicals and wastes for the Basel, Stockholm and Rotterdam Conventions, we have not had the time to study the draft in detail. We will therefore do so after these meeting and provide you with supplementary comments.