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A Strategic Vision for the OECD EHS Programme

BIAC greatly appreciates the opportunity to have a more in-depth discussion on our strategic vision, which we presented for the first time at the Joint Meeting in June 2005. The following paper further develops the proposals we presented at the last meeting and gives some specific ideas on a priority setting process and possible path forward.

Introduction

Agenda 21, Chapter 19, established and agreed at the United Nations Conference on Environment and Development (UNCED) in Rio in 1992 is the basis of contemporary ideals on chemicals management. The Johannesburg Plan of Implementation renews the commitment to sound management of chemicals throughout their lifecycle and aims that by 2020, chemicals are used and produced in ways that lead to the minimisation of significant adverse effects on human health and the environment. BIAC believes that the OECD has an important role to play in setting and implementing an international framework for chemicals management and in contributing to global discussions in this area. This paper sets out how BIAC believes that the Joint Meeting of the OECD Environment Health and Safety (EHS) Programme can prioritize its work in order to achieve the UNCED mandate, while making the most effective use of resources.

The OECD and BIAC

The OECD is a unique forum where the governments of 30 market democracies, in close co-operation with selected non-member countries, work together to address the economic, social and governance challenges of globalisation as well as to maximise its opportunities. The OECD provides a setting where governments can compare policy experiences, seek answers to common problems, and identify good practices and work to coordinate domestic and international policies. The OECD EHS Programme helps governments reduce barriers to trade, optimise the use of resources, and save time and money for governments and industry through cooperative working on chemicals, pesticides and the products of biotechnology. BIAC is involved in the wide range of OECD EHS activities and contributes its unique perspective and practical experience to the development of policies and programmes for chemical testing and assessment and other policy work.

A Strategic Vision

BIAC's vision for the OECD EHS Programme is that it remain the forum of choice in the global context for leadership on chemical evaluation, assessment and management issues; continue to develop high quality tools and guidance on technical and policy matters; and provide a unique and valued venue for sharing and mutual assistance among members on chemical management issues. A "strategic" approach to this vision suggests that the OECD adopt a process by which duplication is avoided, the skills and expertise of other OECD Directorates are routinely incorporated into EHS activities, resources are focused on work areas that are broadly supported and provide unique value, and where the work is carried out with a clear awareness of its impact and consequences for member and non-member countries. We do not imply this is not now the case. Rather, we suggest reinforcing those qualities by establishing a process where issues are periodically discussed and appropriately addressed. To that end and as described below, we believe the EHS Program should more transparently prioritize its activities, identify work areas that contribute to capacity building and sustainability, and remain closely involved in the development and implementation of a Strategic Approach to International Chemicals Management (SAICM).

Prioritise Activities

The OECD Joint Meeting faces a challenge in managing a large number of activities which are likely to create competing demands on the programme and difficult but necessary choices within the confines of a limited budget. We therefore recommend establishing a process to prioritize and select a number of key projects that are agreed to be priorities for – and are widely supported by – a solid majority of its members, and for which the OECD EHS Division has specific added value. Activities and priorities should be reviewed on a regular basis.

BIAC would therefore like to recommend that the OECD EHS Division carry out a detailed survey of member countries, covering both the priorities and relative resources invested in those priorities. BIAC would conduct a similar survey of its members. We further recommend that the survey be carried out on a regular basis as priorities are not static. Specifically, we propose asking the following questions for which each of the Joint Meeting's work areas would be ranked according to priority:

1. What are the work areas in which you invest the most resources (including staff resources and direct contributions)?
2. What are the work areas from which you receive the most value?
3. What are the work areas for which OECD provides a unique value not provided by other domestic work or intergovernmental programme?

BIAC recognizes that all work areas consume resources, and all work areas provide value. However, the objective of the survey is to provide information on the value of work areas in relation to the resources consumed, and in relation to the value of work by OECD. Therefore, BIAC suggests that each work area be ranked from 1-10 (least to most), rather than by other means (e.g., high, medium, low). It should be understood at the outset that work areas with low overall ranking are not necessarily eliminated, or that a work area with

high rankings could not be streamlined. However, by providing transparency into the overall outcome of work as viewed by all participants, better decisions could be made going forward on the basis of shared objectives, and coherent, rationalized priorities. While survey results could ultimately lead to less attention to certain areas, it would have the benefit of providing information on which activities could benefit from greater focus.

Initial BIAC Priorities

BIAC believes that the specific value added of the core parts of the OECD EHS programme lies in its concrete cost-saving effects for industry and government by harmonising select approaches and avoiding duplicative data requirements. We therefore actively support OECD's technical work that promotes the cost effectiveness of policy measures by ensuring consistency and coherence in chemicals management. As the trend towards "doing more with less" increases, so too will the importance and reliance on work sharing that is the hallmark of OECD activities. BIAC recommends that the OECD focus on and reinforce in particular those activities which create real value for its members. The strategic direction should focus on the Organisation's unique skills set, expertise and the added value it can provide compared to other organisations.

After discussion of our Strategic Vision paper at the 38th Joint Meeting, BIAC was asked if it would consider offering its views on specific activities. As of this writing, the BIAC Chemicals Committee has not conducted a formal survey of its members. However, in response to the request, and based on informal input and a preliminary review of areas where BIAC volunteers have invested significant time and money, we believe the following areas would likely rank high among our members at the present time. These areas are given in no particular order.¹

- **Test Guidelines:** Creating and adopting harmonized test guidelines is a cornerstone of the JM work, enabling other work on new and existing chemicals, and risk management. This is a prime example of where OECD work adds unique value, saves resources, and helps build capacity.
- **Existing Chemicals:** Progress on the evaluation of existing high volume chemicals is among the most important, successful and tangible outputs of the EHS programmes. This work enables a vast number of other programmes, including those of OECD member and non-countries, and the public.
- **New Chemicals:** Streamlining the evaluation and approval of new chemical products provides economic benefit to government, industry and the public, including through the development and introduction of newer, greener products.
- **Harmonisation of Classification and Labelling**
- **MAD**
- **(Q)SARs**

¹ BIAC notes that we have not included biotechnology among the top issues. This is not a suggestion of the value of work in that area; rather, it is not an issue that the BIAC Chemicals Committee manages under our current structure.

- **Pesticides:** The plant science industry welcomes and supports the "Vision" of the OECD Working Group on Pesticides on "a Global Approach to the Regulation of Agricultural Pesticides". Work-sharing activities will help reduce the time that authorities spend on dossier evaluation, providing greater consistency, transparency and predictability in regulatory decision-making. Farmers will benefit from gaining earlier access to new and safe crop protection products and industry will benefit from lower trade barriers and costs associated with the regulatory process.
- **Nanotechnology:** BIAAC appreciates that thoughtful, high quality work on significant emerging issues such as nanotechnology can be efficiently conducted under the auspices of the Joint Meeting. BIAAC is closely following further developments in this area, which has the potential to become a priority field of activities.

Identify and Integrate Work Areas that Contribute to Capacity Building and Sustainability

A large number of JM work areas contribute to capacity building and sustainability in developing nations. Until now, few efforts have been made to specifically identify and catalogue these contributions as such. In the short term, BIAAC recommends that the OECD Secretariat, perhaps working with the Bureau and/or Task Force chairs, prepare an initial list of JM work areas and work products that contribute to capacity building and sustainability. Thereafter, this list could be updated and distributed to members, non-member countries, and intergovernmental organizations. In the longer term, work area leaders would be encouraged to identify and focus on work which contributes to capacity building and sustainability.

Further Integrate Economic Considerations into Chemicals Policy

As a multi-disciplinary organisation with strong economic capacity, OECD is uniquely positioned to look at the complex interactions between economic and other policies and to ensure that the economic perspective is duly reflected in the development of environmental, chemicals and other policies. The strategic direction of the JM should capitalize on the Organisation's unique skills set, expertise and the added value it can provide compared to other organisations by integrating the economic perspective into chemicals policy.

To maximize access to these resources, BIAAC recommends instituting a periodic consultation, perhaps among an expanded JM Bureau and other Directorates within the Secretariat to ensure that proper consideration is applied to directions and decisions made within the Joint Meeting. Additionally, member countries would be encouraged to consult internally with their trade, economic or other ministries regarding the JM work areas and report back on opportunities to avoid duplication of efforts and maximize integration of the economic and environmental aspects of JM work. A brief discussion would then be held during each JM to review identified opportunities.

Reinforce OECD's contribution to SAICM implementation

In addition to its highly valuable technical work, BIAAC believes that OECD should step up its contribution to the implementation of the Strategic Approach to International Chemicals

Management (SAICM). As the only economic organisation involved in this process, OECD has an important role to play in, among other areas, ensuring that the economic perspective is duly reflected in global discussions in this area. We also see an enhanced political role for OECD within the IOMC as an important partner providing technical guidance and economic expertise.

BIAC recommends that OECD Member countries fully consider the role that the OECD chemicals programme has played and should continue to play as a key focus for international chemicals management. In this context, we would welcome close cooperation between the EHS Division and other parts of the Organisations on issues where a multi-disciplinary approach, such as in the case of SAICM, is necessary. Given its strong economic capacity, the OECD would be ideally suited to address economic impacts of policy options and strategies.

We also recommend that OECD has a continued strong presence in SAICM discussions and that the Joint Meeting or JM Bureau includes the issue of SAICM on its meeting agendas to ensure that the best possible input is provided.

Proposed action plan for OECD

The OECD has made a major contribution in setting a framework for chemicals management and has played an important role in building trust between governments, which has led to mutual acceptance of data in many areas. It is not only the countries already in membership of OECD that gain from the chemicals programme. The OECD programme also helps other countries to start working on chemicals management and control at a level appropriate to them, while promoting global trade through a harmonised regulatory approach.

We see a unique and continuing role for OECD promoting mutual acceptance of data and international harmonisation, while at the same time recommending that the Organisation take on a leadership position in the ongoing discussions on global chemicals management, contributing in particular its economic perspective. In view of the above-mentioned considerations, BIAC recommends OECD to:

- Place high priority on its technical work, in particular on the harmonisation of programmes and tools, including outreach of technical knowledge related to chemicals management,
- Focus on priority issues that are widely supported by its members and streamline the programme of work, if necessary, based on results of a concrete survey on priorities,
- Ensure that an economic perspective is duly reflected in OECD deliberations relative to the development of environmental, chemical and other policies,
- Define the role of OECD in the implementation of SAICM and strengthen the integration of economic concerns in international chemicals policy discussions.

BIAC stands ready to assist the OECD and its members in bringing these programmes forward.

ANNEX

Proposed survey

Proposed Survey Template for OECD Member Countries and Observers

Issue #	Issue/Work Area	Score by Investment Made	Score by Value Received	Score by Unique Value of OECD Work
1	New Chemicals			
2	Chemical Product Policy			
3	Existing Chemicals			
4	Environmental Exposure Assessment			
5	Policy Dialogue on Exposure Assessment			
6	Risk Management: BFRs			
7	Risk Management: PFOS, etc.			
8	PRTRs			
9	Chemical Accidents			
10	Pesticides			
11	Test Guidelines			
12	Toxicogenomics			
13	Templates			
14	Biocides			
15	(Q)SARs			
16	Harmonized System of Classification and Labelling			
17	Nanotechnology			

Note: To allow for an accurate tabulation, each issue should be scored from 1 (low) to 10 (high) for each column. Explanatory notes can be provided in a separate attachment. The JM may wish to specify that only aggregate results will be provided.