

6 October, 2017

**Japan's comments on Preliminary draft of the ministerial outcome document
Released on 21 September 2017**

Japan appreciates the initiative of H.E. Edgar Gutierrez-Espeleta, President of the UN Environment Assembly to develop the preliminary draft of the ministerial outcome document.

I. General comments:

1. Japan believes that a Chair's Summary should be kept as an option, as well in order to avoid lengthy drafting exercise, bearing in mind the lesson learned from the UNEA-2.
2. Japan also believes that the ministerial outcome document should be realistic, concise, well-focused and action oriented.
3. We should refrain from using "agree" and "commit" to avoid legal implication. Japan suggests using words such as "should" or "address" instead.

II. Specific comments:

4. On paragraph 2 and 6, many statistical numbers are quoted from the sources compiled in the document "Sources for the preliminary draft of the ministerial outcome document released on 21 September 2017", but we are not sure about the reliability some of those data. For example, "the US\$8.7 billion annual cost of intelligence quotient loss from exposure" in paragraph 6 is not known in the forum of the Minamata Convention. We would like to point out 'exposure to by-products emissions of mercury' is unclear and needed to be reviewed (It seems that both "mercury emissions" and "by-product mercury" are used in consistently in the draft.). In the light of the nature of the ministerial document, we should be extremely careful to choose statistics to quote in it, so that the statistics should not be controversial.
5. On paragraph 5, Japan proposes:
 - i. Changing "transition to" to "transition towards" to keep consistency with the title.
 - ii. Replacing "reduce global warming" with "tackle climate change", because

“global warming” is one aspect of climate change issues.

6. On paragraph 7, Japan proposes:

- i. Changing “Solutions to help remove pollutants and detoxify our environment” to “Solutions to minimize risks caused by pollutants”, because the concept of risk management should be clearly stated.

7. On paragraph 9, Japan proposes:

- i. Under chapeau and sub-paragraph b, keep consistency on the language (ex. “prevent, mitigate and manage” and “prevent, control and reduce”)
- ii. Immediately after sub-paragraph a, create a new sub-paragraph on “increasing awareness raising and knowledge sharing on pollution.”, given that how we should share and disseminate scientific knowledge and experiences gained from the pollution in the past is important.
- iii. In sub-paragraph b, add “, including the Minamata Convention on Mercury, which entered into force this year,” after “regulations.” Since it is important to highlight this new Convention in this ministerial outcome document to enhance political momentum to implement this Convention which is still in its initial stage.
- iv. In sub-paragraph b, add “, regional and national” between “global” and “policies” because some pollutants which do not necessary cause global issues but have heavy impact on certain areas. Also add “risks of” before “pollutants where the impact is not yet clear”, as policy needs to be developed based on the risk assessment of the pollutants.
- v. In sub-paragraph c, add “high-quality” before “new”, because not all new technologies might be efficient compared to others.
- vi. In sub-paragraphs c and d, phrases such as “reuse, recycle” and “the sound management of chemicals and waste” should be retained. Since it is also important for producers and consumers to “reduce waste” in order to promote sustainable consumption and production patterns “reduce waste, as well as,” should be inserted before “rethink”.
- vii. As for sub-paragraph d, the need for “making the best use of policy interlinkages, trade, investment, and innovation opportunities” is not limited to chemical and waste management. Therefore, the sentence should be end with “sustainable chemistry”, and after that another sentence referring to the best use of policy interlinkages etc. in the field of environmental conservation in general ought to be added.

8. On paragraph 12, Japan proposes:

- i. Replacing “and scale-up” with “accelerate the implementation of”.
- ii. Removing “establishing a common platform for action on pollution” and “global coalition for a pollution-free planet” because we believe that we should utilize existing fora more effectively rather than establishing new ones.

(END)