

Fidra believes that sound chemical management for the prevention of pollution needs to be based on the principles outlined below:

1. **Chemical Policy Integration:** Recognising the reach of chemicals across all sectors, governments and organisations must move towards ‘mainstreaming’, or integration, of chemical policy, ensuring consideration of chemical use and impacts are included in all relevant decision-making.
2. **Ending unnecessary use of chemicals:** All producers, manufacturers, retailers and consumers need to identify and undertake measures to reduce non-essential chemical usage. Voluntary efforts must, in turn, be supported by underlying regulatory principles that prevents the use of chemicals of environmental concern for all non-essential functions.
3. **Proceed with precaution:** The precautionary principle must be applied when considering the use and restriction of chemicals. To implement the precautionary principle, we advocate a chemical class-based approach. Restrictions limiting the use of known chemical hazards or chemicals of emerging concern should extend to include similar compounds within the relevant chemical class unless the safety of these chemical analogues can be demonstrated.
4. **Supply chain transparency:** Full materials disclosures are essential to enable the identification of known hazards at all levels within the value chain and will allow supply chains to react efficiently to newly identified hazards, substances of concern and legislative changes.
5. **Access to information:** Transparency and accessibility of data for all users will ensure safe use, reuse and recycling within a circular economy and enable informed decision-making at all levels from primary sale to end-of-life disposal.
6. **Assess and reassess regularly:** Thorough and regular assessment of the emerging evidence base is needed to ensure consumer and environmental safety is maintained.
7. **Enforcement:** Strict enforcement with regular checks and prohibitive penalties for non-compliance, should be applied across all stages of the supply chain.
8. **Who pays:** In line with the polluter pays principle, the economic model should be such that the full financial burden of disposal, management and clean-up is borne by the producers and suppliers of chemicals and products containing chemicals, not the public.
9. **Strong evidence base:** Research and long-term monitoring are essential in providing policy, industry and society with the knowledge, predictive understanding and tools necessary to ensure safe use of existing chemicals and the early identification of emerging contaminants.
10. **Chemical justice:** Those impacted by chemical pollution must be considered and represented in chemicals governance and decision making. Routes to influence must be established for those impacted by chemicals pollution, informing legislation and industry practices.