

ANNEX 3

**Review Results on SAICM National Implementation Plan
of Japan
(Civic/Consumer Groups and NGOs/NPOs)**

(March, 2020)

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I. Introduction

Strategic Approach to International Chemicals Management (SAICM) National Implementation Plan of Japan was compiled in September 2012 at the Inter-Ministerial Meeting on SAICM as an indicator of the future strategies for achieving the WSSD 2020 goals. The plan states, “the progress of SAICM National Implementation Plan will be reviewed in the Inter-Ministerial Meeting on SAICM prior to ICCM4 to be held in 2015, and the results will be announced.” The progress of the plan was reviewed from 2014 to 2015.

In this year, when the SAICM 2020 goals become due, this report describes results of the review in various initiatives by Civic/Consumer Groups and NGOs/NPOs in SAICM National Implementation Plan of Japan.

SAICM National Implementation Plan of Japan of 2012 identifies as participants in development of the Plan not only workers, businesses, the national and local governments, and academic experts but also citizens. SAICM National Implementation Plan of Japan expects civil society organizations such as NGOs/NPOs to serve as a mediator for activities by citizens, businesses, the national and local governments, and other actors while undertaking their own missions, most notably providing these actors with objective and lucid information and advice on the risks with chemical substances. The plan introduces specific cases of chemicals management initiatives by civil society organizations.

In this respect, the report has compiled various initiatives on chemical management implemented by the civil society organizations through questionnaires and the obtained progress results.

The results of the Review show that civil society organizations have been taking a wide and varied range of initiatives with regard to some of the issues that are identified in SAICM National Implementation Plan of Japan as “emerging and uncertain issues” or “issues to be examined in the future”; in other words, issues that have not been adequately addressed by governmental actors and issues that citizens are not fully aware of. These initiatives include organizing study meetings, holding seminars and lecture meetings for citizens, and providing them with information via websites and pamphlets and with consultation services. The Review has concluded that progress has been generally made in all these initiatives. Further steps that the civil local governments need to work on will be considered based on new international framework on chemical substance management after 2020, which is scheduled to be formulated in ICCM5, the national plan formulated by the government as an alternative to the SAICM National Implementation Plan of Japan, and the issues pointed out by this review.

II. Selected Initiatives by Civil Society Organizations

1. NGO Network for Realization of the Aarhus Convention in Japan (Aarhus Net Japan)

[About the Organization]

The NGO Network for Realization of the Aarhus Convention in Japan (Aarhus Net Japan) was founded in October 2003 for the purpose of ensuring citizens' rights with regard to environmental matters. The organization's action plan is to realize the three rights (access to information, public participation in decision-making, and access to justice in environmental matters) guaranteed by the Aarhus Convention, and its initiatives in this regard include such activities as conducting awareness campaigns and information exchanges concerning the Aarhus Convention and formulating proposals for the establishment of domestic statutes (on a national level) that will meet the standards set out in the Aarhus Convention.

1.1 Organizing Study Meetings

[Overview of the Initiative]

The Aarhus Net Japan organizes, irregularly, study meetings with a view to establishing in Japan three rights guaranteed under the Aarhus Convention: access to information, public participation in decision-making, and access to justice in environmental matters.

[Initiative's Outcomes]

Study meetings conducted since October 2014 are as follows:

- ◇ November 18, 2014 "Access to information on environmental matters"
- ◇ January 14, 2015 "Discussion of public participation in decision-making on environmental matters"
- ◇ March 24, 2015 "Public participation in environmental matters: Current situation and issues of the right to access to justice"
- ◇ April 14, 2015 "Consideration in terms of the issue of the Linear Chuo Shinkansen: Current situation and issues of the Environmental Impact Assessment Act"
- ◇ May 12, 2015 "With an eye to the formulation of medium- to long-term environmental strategies: For effective public participation"
- ◇ June 9, 2015 "Issues on wind power generation and wild birds and the solutions for them"
- ◇ July 14, 2015 "Global trends of public participation shown by the Environmental Democracy Index (EDI)"
- ◇ August 19, 2015 "NGO's participation in policy decisions: Learning from the cases of development-related NGOs"
- ◇ September 16, 2015 "Review of the grant program administrated by the Environmental Restoration and Conservation Agency and its progress"
- ◇ January 25, 2016 "the Aarhus Convention and PRTR"
- ◇ April 20, 2016 "Utilize the Aarhus Convention in an actual system"
- ◇ May 17, 2016 "Why does Japan need a litigation system for an environmental organization?: Learn from the principles of the Aarhus Convention and its practical examples"
- ◇ September 6, 2017 "Five years have past since the revised Act on Enhancing Motivation on Environmental Conservation and Promoting of Environmental Education came into force-Thoroughly review the status of enforcement! Has collaboration with citizens been facilitated?"
- ◇ October 26, 2017 "For promoting information disclosure in the environmental field: Current situation of an information disclosure system"
- ◇ December 13, 2017 "Global trends of litigation over global warming: Focusing on litigation over Vienna Airport "
- ◇ July 20, 2018 "For facilitating policy proposals on environmental issues by citizens: Learn

from experiences of Coalition for Legislation to Support Citizen's Organizations"

- ◇ November 28, 2019 "Revised Water Supply Act: What will privatization change in the water supply service?"

1.2. Participation in Assessment Using the Environmental Democracy Index

[Overview of the Initiative]

Aarhus Net Japan participated in the assessment using the Environmental Democracy Index conducted in 70 countries worldwide by the Access Initiative (TAI), the world's largest network for promoting public participation in the Environment Field, launched in 1999 in collaboration with more than 150 civil society organizations around the world. The results of this assessment were published in May 2015, and the details are posted on the website of Aarhus Net Japan.

[Initiative's Outcomes]

Specifically, Japan obtained the following outcomes, being ranked fourth out of 19 Asian countries and 32nd out of 70 countries all over the world.

[Japan's Outcomes]

1. Right to access to information: Right to access to information gets a relatively high score of 1.96 out of 3 due to existence of an established information disclosure system.
 2. Right to participation in Decision Making: Public participation in decision-making on environmental matters and policy development is scored 1.1 out of 3, because of the unavailability of a sufficient legal framework to secure citizens' participation.
 3. Right to access to justice: As for right to access to justice, those who can bring an environmental trial (eligible for plaintiffs) are limited to those who have legal interests, resulting in the least access to a trial to resolve environmental matters. Therefore, it is scored 1.47 out of 3.
- ◇ The "legal indicators" score was lower than the "practical indicators," and the overall score was 1.51.
 - ◇ According to TAI, in the future, Japan will be able to improve its scores by requiring provision of information in a timely manner in the event of an accident as for information disclosure, requiring response to comments submitted as for participation, and expanding eligibility for plaintiff to make a trial more accessible as for access to justice.

1.3. Submission of public comments

[Overview of the Initiative]

Public comments were submitted to “the FY 2016 panel to discuss the Act on Conservation of Endangered Species of Wild Fauna and Flora.” The panel was established to discuss the way “the Act (Species Preservation Law, enforced in June 2014) should be.”

[Initiative’s Outcomes]

Public comments were submitted on September 13 and 24, 2016, requesting legalization of a permanent scientific committee, legalization of a specifying proposal system by citizens, and establishment of a council on the programs for the rehabilitation of natural habitats and maintenance of viable populations.

1.4. Producing a pamphlet

[Overview of the Initiative]

Aarhus Net Japan has worked with the Green Access Project at the Graduate School of Law and Politics, Osaka University, to produce an easy-to-understand pamphlet on the Aarhus Convention (see Figure 1).

In addition, the European Economic Commission published its Japanese version outlining the Aarhus Convention (see Figure 2) in 2019.

[Initiative’s Outcomes]

Aarhus Net Japan has produced the pamphlet shown in Figures 1 and 2 and distributed copies of it as part of its information campaign on the Aarhus Convention.

Figure 1 Pamphlet on the Aarhus Convention



Figure 2 Japanese Version of the quick guide to the Aarhus Convention



2. Shufuren (Japan Housewives' Association)

[About the Organization]

Shufuren (The Japan Housewives' Association) is an association of consumer groups and individual consumers formed in October 1948. The impetus for its formation was the Housewives' Rally to Eliminate Defective Matches (a movement that forced businesses to replace defective matches), which took place the previous month. The organization's action plan consists of activities that are essential to establishing consumers' rights and protecting consumers' lives and livelihood.

2.1. Making Presentations and Requests to the Government

[Overview of the Initiative]

Shufuren makes representations and requests, including submitting written questions, to the national government regarding its policies and measures.

[Initiative's Outcomes]

Some of the recent representations and requests made by Shufuren in relation to chemicals management are shown below. Note that they include those that may be outside the scope of SAICM (e.g., representations and requests relating to food) for reference.

- ◇ December 6, 2019 "We agree with the revision that clarifies that no organic JAS products can use raw materials produced using genome editing technology."
- ◇ October 23, 2019 "We call for mandating safety review and labeling on all foods that are using genome editing technology."
- ◇ May 16 2019 "Comments on long-term strategy (draft) as a growth strategy based on the Paris Agreement"
- ◇ August 3, 2018 "Scientific and technical comments on the examination draft regarding application for permission to change the installation of the nuclear reactor in Tokai No. 2 Nuclear Power Station of the Japan Atomic Power Company"
- ◇ December 14, 2016 "We oppose adding the cost related to nuclear power to wheeling charges. We demand transparency of the deliberation process, as well as fair and equitable system design."
- ◇ April 10, 2015 "The System of Foods with Function Claims is a flawed system. We call for an immediate review of the system."
- ◇ April 12, 2015 "We value the opinions offered by the Japan Atherosclerosis Society and request that the labeling of trans fatty acids should be mandatory."

2.2. Information communication through the bulletin

[Overview of the Initiative]

Shufuren communicates information on latest developments in chemicals management and related risks through its monthly bulletin called “*Shufuren Tayori*.”

In 2018, Shufuren received a subsidy related to a project to promote measures for reducing volatile organic compound (VOC) emissions in cooperation with the Tokyo Metropolitan Government and private sector entities. At three locations in the Tokyo metropolitan area, posters for reducing VOCs were posted and explanation on "what we can do!" to reduce VOCs was given to visitors. Also, the Association published a handbook specialized in VOCs, "What is VOCs? Q&A on chemical substances" and distributed it to many people.

[Initiative's Outcomes]

“Q&A on chemical substances” a serial in *Shufuren Tayori*, explains specialized topics on the latest regulatory developments and risks relating to chemicals management in lucid language. The titles of such serial articles in FY2014 are shown below:

- ◇ Q & A on chemical substances No. 155: Leaked from US bases? Organic fluorine (July 2019)
- ◇ Q & A on chemical substances No. 151: Impacts of agricultural chemicals on human health, organisms, and the environment (March 2019)
- ◇ Q & A on chemical substances No. 148: Water-repellent spray might post health hazards depending on its usage (December 2018)
- ◇ Q & A on chemical substances No. 142: VOCs causing photochemical smog (June 2018)
- ◇ Q & A on chemical substances No. 131: Risk after spraying agricultural chemicals from unmanned aerial vehicles (July 2017)
- ◇ Q & A on chemical substances No. 128: The truth of PM 2.5 and its effect on human health (April 2017)
- ◇ Q & A on chemical substances No. 117: Contamination with hexavalent chromium is still monitored (May 2016)
- ◇ Q & A on chemical substances No. 114: The truth of fire extinguishing foam (February 2016)
- ◇ Q & A on chemical substances No. 113: Relationship between bladder cancer and O-Toluidine (January 2016)
- ◇ Q & A on chemical substances No. 111: Using preservatives for producing glue is banned (November 2015)
- ◇ Q & A on chemical substances No. 101: Carcinogenicity of 2,3-diethyl pyrazine has not been confirmed (January 2015)

Source: *Shufuren Tayori* on the Shufuren website <https://shufuren.net/tayori>

2.3 Questionnaire Surveys of Consumers

[Overview of the Initiative]

Shufuren conducts questionnaire surveys of consumers on various topics as part of its voluntary research initiative.

[Initiative's Outcomes]

The findings of these surveys are reported in *Shufuren Tayori*.

Two of these surveys are outline below:

◇ A consumer survey on personal care products (FY2012)

Shufuren conducted a survey on the labeling and ingredients of personal care items such as skin care, hair care, and deodorant products. This survey was conducted at the market and in-store levels.

In order to identify problems, the survey tried to answer three specific questions: (i) After all ingredients of cosmetics were made subject to labeling, are there any changes in the ingredients used as preservatives?; (ii) Are there any problems with the labeling?; and (iii) What information do brick-and-mortar and online shops provide? The findings of the survey will be used for making recommendations and other purposes.

◇ A market survey on product safety assessment for toy safety-related standard development (FY2008)

An overwhelming majority of products in the Japanese toy market are manufactured in China and other foreign countries. Some of them are found to contain lead and phthalate esters beyond the permissible levels. However, there is no unified method of specification testing with regard to chemical substances in these imported products.

To make matters worse, a number of inappropriate cases have been reported since July 2008. In some cases, specification testing of tableware and toys requested by the importers (testing under a bilateral contract, rather than testing under the Food Sanitation Law) has not been conducted. In other cases, before such testing, a certificate of test results has been issued and submitted to the relevant quarantine station at the time of import notification.

The Public Notice of the Ministry of Health, Labour and Welfare No.153 of March 31, 2008 amended the provisions under “IV Toys” of the Standards and Criteria for Food and Food Additives, etc. (Public Notice of the Ministry of Health, Labour and Welfare No. 370 of 1959) that define the specifications of toys and their raw materials. As a transitional measure, however, toys newly specified under the amended provisions may be sold even on and after October 1, 2008 if they were domestically manufactured or imported by September 30, 2008.

Under these circumstances, Shufuren bought some toys on the market and asked public testing institutions to examine their chemical safety. It also examined the testing environment and conditions and the examination reports of these institutions and compiled the results into a report.

The toys Shufuren bought are those available on the domestic market and for which many complaints were brought to National Institute of Technology and Evaluation (NITE) and the National Consumer Affairs Center of Japan.

2.4 Organizing Study Meetings

[Overview of the Initiative]

Shufuren organizes study meetings on various topics to raise consumers' awareness.

[Initiative's Outcomes]

The following are some of the study meetings on chemicals management organized by Shufuren:

- ✧ Tour of a sewerage treatment plant (December 2019)
- ✧ Situation of micro plastics (February 2019)
- ✧ VOC? What we can do for it! (September 2018, February 2019)

2.5 Offering consultations for consumers and holding information meetings with companies

[Overview of the Initiative]

Shufuren offers consultations on chemical substances for consumers. In cooperation with the National Liaison Committee of Consumers' Organizations (Shodanren), Shufuren holds dialogue meetings with companies.

[Initiatives' Outcomes]

Counselors well-versed in chemical substances at Shufuren respond to the requests for advice from general consumers.

Shufuren also participates in dialogue meetings with companies, which are organized in cooperation with Shodanren.

3. Japan Endocrine-disruptor Preventive Action (JEPA)

[About the Organization]

Japan Endocrine-disruptor Preventive Action (JEPA), a non-profit organization, was founded in September 1998 by a group of 50 experts from various walks of life. These founders had responded to a general call from 158 female attorneys from throughout the country to establish of a grass-roots organization for the purpose giving the future back to our children by warding off the ongoing crisis faced by human beings and every other species as a result of pollution by endocrine disruptors. The organization's action plan consists of bringing together people who will set aside their interests and differences and use their combined intelligence to come up with appropriate policy proposals that will influence public opinion and thus lead the government to adopt effective policies in this regard.

3.1 Organizing Lecture Meetings on the Effects of Chemical Substances on Human Health

[Overview of the Initiative]

JEPA organizes international citizens' seminars on the effects of chemical substances on human health. These seminars are made up of two parts: a set of lectures for experts and one for the general public.

[Initiative's Outcomes]

On November 15 and 16, 2014, JEPA organized an international citizens' seminar on the effects of chemical substances on the next generation. The lecturers included Dr. Bruce Blumberg, Professor at the University of California, Irvine; Dr. Andreas Kortenkamp, Professor at Brunel University London; and other eminent persons.

The outline of the seminar is shown below:

- ◇ November 15, 2014: International citizens' seminar I (for experts) "What will become of the EU regulations on endocrine disruptors and what should we do? Input from Dr. Kortenkamp, one of the leading authorities on endocrine disruptors who authored reports for EU and WHO."
 - Lecture 1: "How does the EU intend to regulate endocrine disruptors?" by Dr. Andreas Kortenkamp, Professor in Human Toxicology at the Institute of Environment, Health and Societies, Brunel University London
Building on his experience in playing an important role in establishing EU regulations on endocrine disruptors, Dr. Kortenkamp made specific suggestions on how chemical substances should be managed based on the precautionary principle.
 - Lecture 2: "How endocrine disruptors are regulated in the United States" by Dr. Bruce Blumberg, Professor of Developmental & Cell Biology, School of Biological Sciences, University of California, Irvine
 - Q&A and discussions
- ◇ November 16, 2014: International citizens' seminar II (for the general public): "Thoughts on how chemical substances affect the next generation, with focus placed on their effects on the intrauterine environment for the fetus and its subsequent development"
 - Lecture 1: "A false belief in bearing small and raising big; the nutrient environment for the fetus causing disease later in its life" by Hideoki Fukuoka, MD, Professor at the Research Council, Waseda University
Japanese women's desires to stay thin have pushed Japan far ahead of other developed countries in terms of the proportion of low birth weight children. This in turn has resulted in the spread of lifestyle-related diseases among the Japanese, warned Dr. Fukuoka. He then explained the importance of nutritional management during pregnancy.

- Lecture 2: “The effects of endocrine disruptors on the fetus; endocrine disruptions during the fetal period causing obesity” by Dr. Bruce Blumberg, Professor of Developmental & Cell Biology, School of Biological Sciences, University of California, Irvine
Dr. Blumberg warned about the effects of foreign chemical substances on the fetal environment. He pointed out that the effects of endocrine disruptors during the period when the fetus develops itself cause after-birth ailments, including obesity.
 - Lecture 3: “Learning from EU regulations on endocrine disruptors; how chemical substances harmful to the fetus should be regulated” by Dr. Andreas Kortenkamp, Professor in Human Toxicology at the Institute of Environment, Health and Societies, Brunel University London
How should society regulate chemical substances that are harmful to the fetus? Building on his experience in playing an important role in establishing EU regulations on endocrine disruptors, Dr. Kortenkamp made specific suggestions on how chemical substances should be managed based on the precautionary principle.
- ✧ On November 22, 2015, JEPA organized an international citizen seminar on “International Citizen Seminar on chemical management in Asia: Learning from China, India and Thailand to protect yourself from chemical accidents.”
Four speakers gave lectures as follows:
- “Tianjin explosion and chemical management in China” by Tianjie Ma from China Dialogue, formerly in charge of chemical issues in Greenpeace of China.
 - “Chemical accidents and management system in Thailand” by Penchom Saetang from Ecological Alert and Recovery Thailand (EARTH.)
 - "Truth 30 years after the Bhopal Chemical Plant Accident in India" Ajay Patel from Sambhavna Clinic India.
 - “Measures for Chemical Substance Accidents in Osaka” by Yasuhiko Taniguchi, General Manager of Environmental Management Office, Environmental Agriculture, Forestry and Fisheries Department, Osaka Prefecture.
- On the following day, a meeting was held to exchange opinions between overseas panelists and persons involved.
- ⇒ Regarding the issues of chemical substance management at the time of an accident, actual cases that had occurred in Asian countries such as the Bhopal Accident in India and the Tianjin Explosions in China were introduced. Cases that had occurred in Japan were also introduced, revealing similarities and differences between the cases in Asia and those in Japan, leading to a deeper mutual understanding.
- ✧ Study meetings held in Japan other than international citizen seminars
- July 27, 2013 "Developmental disorders in children and effects of trace chemicals on them" (Yoichiro Kuroda, Director of the Environmental Neuroscience Information Center, and Mitsuru Sakabe, Professor of Tokai University School of Medicine)
 - August 30, 2013 "The Minamata Convention on Mercury and issues Japan faces" (Takashi Yorifuji, Associate Professor of Medical School of Okayama University, Takeshi Yasuma from Citizens Against Chemicals Pollution, and staff from Ministry of the Environment)
 - October 12, 2013 "Effects of chemicals on children’s development" (Lecturer: Professor Philippe Grandjean, University of Southern Denmark)
 - June 24, 2014 "PM 2.5 and Nanoparticles: Things to know to reduce risk on the next generation" (Masakazu Umezawa, Tokyo University of Science)
 - July 27, 2014 "Current status of children with developmental disorders and the roles of society: Environmental chemicals as causes" (Yoko Kamio, National Institute of Mental Health: National Center of Neurology and Psychiatry, and Yoichiro Kuroda, Director of the Environmental Neuroscience Information Center)
 - July 26, 2015 "Environmental hormonal problems are not over! What is tissue signal toxicity? Deceived cells and tissues"(Jun Kanno of National Institute of Health Sciences)
 - March 12, 2015 "Pitfalls of a fragrance boom: what are the causes of spreading smell pollution, scented fabric softeners?" (Akio Yasuhara, Former National Institute for Environmental Studies, and Faculty of Science and Technology, Tokyo University of Science,

3.2 Preparing Booklets and Pamphlets

[Overview of the Initiative]

JEPA issues thematic booklets and pamphlets on the effects of harmful chemical substances on human health.

[Initiative's Outcomes]

The booklets JEPA has issued so far (all in Japanese) are enumerated below:

1. "Protecting children from chemical pollution," 2003, Rev. ed. in 2006 (stockout)
Effects on children in the development stage / Children's lives and chemical substances / Countermeasures and civic movements
2. "Dioxins in food: How can we protect ourselves from Dioxins?" 2003
Is it safe to eat fish? / Dioxins in seafood / Where do Dioxins in seafood come from and what can we do about it? / Diet and Dioxins / For pregnant women and nursing mothers as well as young women / Conclusion
3. "Are you using household products without knowing the risks involved?" Rev. ed. issued as the booklet shown in 8. below.
4. "Why Japan could not stop industrial environmental pollution: pursuing the application of the precautionary principle," 2005
Why the precautionary principle now? / Industrial environmental pollution in Japan and the precautionary principle / What is the precautionary principle? / Suggestions
5. "Asbestos in your life: are you inhaling it without knowing the risks involved?" 2007
Developments in the asbestos problem / Health hazards of asbestos / Measures against asbestos and their effectiveness / Where is asbestos used? / How should you cope with asbestos? / Our suggestions
6. "Where are toxic metals?: What can we do to protect children from them?" 2009
What are toxic metals? / Some typical toxic metals / What can be learned from hair examinations of mothers and children / Current laws and regulations on toxic metals / Our suggestions
7. "Multiple chemical sensitivity: the forefront of its treatment and research," 2010
A report on an international seminar on multiple chemical sensitivity / Dispute settlement cases concerning multiple chemical sensitivity and the sick building syndrome / Appendix: bibliography on a list of literature addressing multiple chemical sensitivity and the sick building syndrome
8. "Are you using household products without knowing the risks involved? Hazardous substances in household products," Rev. ed. 2012
To reducing risks associated with household products / Let's check the hazards of products! / Let's learn how society works! / Laws and regulations on chemical substances / Our suggestions
9. "To protect the future of children: For the achievement of the 2020 goals of chemical substances"
Interview date: March 2014, issued as a pamphlet.
A pamphlet for the general public that summarizes trends in chemical substance regulations overseas including the EU to achieve the 2020 goals, and issues in domestic implementation plans.
10. "Babies are in danger" issued as a pamphlet in March 2015
A pamphlet that summarizes the latest research findings on issues of endocrine disrupting chemicals, as well as overseas trends of regulation over them in an easy-to-understand manner for the general public
11. "New agricultural chemical, neonicotinoids threatens bees, ecosystems, and humans" issued as a pamphlet in 2015
A pamphlet that summarizes what neonicotinoid agricultural chemicals are, their effects on honeybees, ecosystems, and humans (especially children), and overseas trends of regulation over them in an easy-to-understand manner for the general public. The revised pamphlet has been issued four times since then.

3.3 Interview with relevant ministries and agencies

[Overview of the Initiative]

- October 17, 2013: Interviewed with persons in charge from the Ministry of Economy, Trade and Industry, the Ministry of the Environment, and the Ministry of Health, Labour and Welfare on the progress of SAICM National Implementation Plan of Japan and the risk assessment of priority chemical substances under the Chemical Substances Control Law.
- February 13, 2014: Interviewed with persons in charge from Ministry of Economy, Trade and Industry, Ministry of the Environment, Ministry of Health, Labour and Welfare (Chemical Substance Safety Office and Labour Standards Bureau), Ministry of Agriculture, Forestry and Fisheries, Ministry of Education, Culture, Sports, Science and Technology, Ministry of Land, Infrastructure, Transport and Tourism, and Consumer Affairs Agency on their efforts in the SAICM National Implementation Plan of Japan
- October 20 & 27, 2015: Interviewed with persons in charge from the Ministry of the Environment and Ministry of Economy, Trade and Industry on the enforcement status of the revised Chemical Substances Control Law
- December 8 & 15, 2015: Interviewed with the Ministry of the Environment, Ministry of Economy, Trade and Industry and the Ministry of Health, Labour and Welfare on the progress of measures related to environmental hormones
- February 29, 2016: Interviewed with the Ministry of the Environment on the latest information about chemical substance management systems in other countries

3.4 Implementation of Policy Recommendations

[Overview of the Initiative]

- In March 2016, issued “Recommendations on Japan's chemical substance management system to achieve the 2020 goals of Johannesburg Summit (WSSD).” The recommendations were distributed to relevant parties including the Ministry of the Environment, the Ministry of Health, Labour and Welfare, and the Ministry of Agriculture and Fisheries, as well as members of the Diet committees of economy and industry, environment, and health, labor and welfare.

4. Japan Consumers' Co-operative Union (JCCU)

[About the Organization]

The Japan Consumers' Co-operative Union (JCCU), a nationwide association of consumers' co-operatives ("Co-ops") and unions of Co-ops from throughout the country, was founded in March 1951 as a Japanese nationwide consumer movement aiming for "peace and a better life." As of the end of fiscal 2014, it was Japan's largest consumer organization, with membership consisting of 330 Co-ops with an aggregate business turnover of ¥3.3 trillion and 27.7 million individual members.

The JCCU's action plan consists of aiding the development of its members by supporting their activities and businesses and by developing proprietary products and supplying (selling) these products to member co-ops, as well as acting as the central body for Co-ops nationwide in such endeavors as interacting with various bodies, broadening the public's understanding of Co-ops, and proposing policies that aim to improve social system.

4.1 Providing Information for Consumers

[Overview of the Initiative]

JCCU generally focuses on food and dietary life. Some of its activities are outside the scope of SAICM. However, it is deemed to contribute to SAICM in that its provision of information for consumers helps them deepen their understanding of the concept of "risk." From this perspective, some of the JCCU initiatives are shown below:

4.1-1) Information provision via the Internet

[Overview of the Initiative]

Having an extensive network involving consumers, JCCU proactively provides information for consumers through various media.

[Initiative's Outcomes]

✧ Initiatives on Food Safety

Each Co-op product is managed based on its unique quality and safety management system, from product design, selection of raw materials, manufacturing, to delivery to the members. In addition, Co-ops across the country cooperate in response to any accidents that have occurred, and inquiries and requests from union members, analyze the causes, and utilize them to improve product quality and prevent accidents.

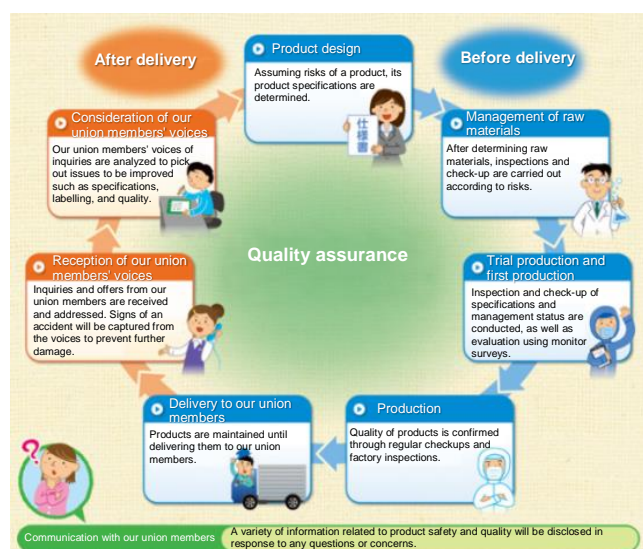


Figure 3 Entire flow of the quality assurance system for Co-op products
Source: the JCCU website “Entire flow of the quality assurance system for Co-op products”
(<https://goods.jccu.coop/feature/promise1/quality/>)

✧ Q&A on food safety

This webpage provides information on chemical substances in food, food additives, and packaging. The information thus provided is classified by theme and issue. For each substance, the webpage explains a number of aspects--ranging from the uses, exposure pathway, and safety to the background to the substance having attracted social attention, as well as what consumers should be cautious about--in a way that is easy to understand for those with no special knowledge.

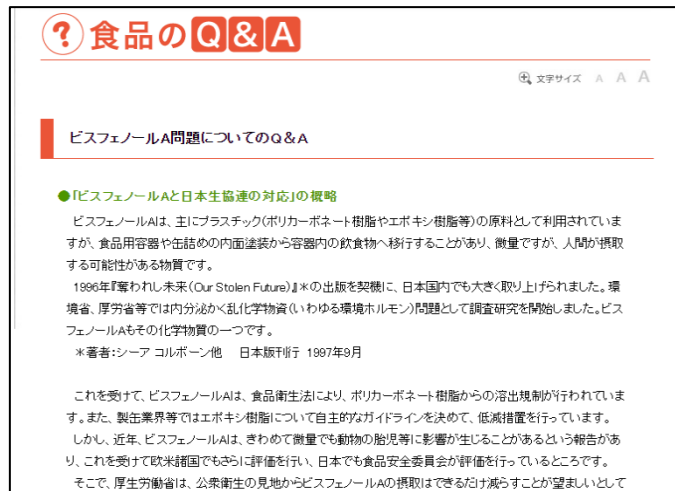


Figure 4 Q&A on the bisphenol A issue

Source: “Q&A on food safety” on the JCCU website(http://jccu.coop/food-safety/qa/qa02_03.html)

◇ About labeling of allergens

In April 2015, the Food Labeling Act was enacted, and the rules for labeling on allergens changed. JCCU introduces various rules concerning allergen labeling of processed foods, and labels used in Co-ops products.

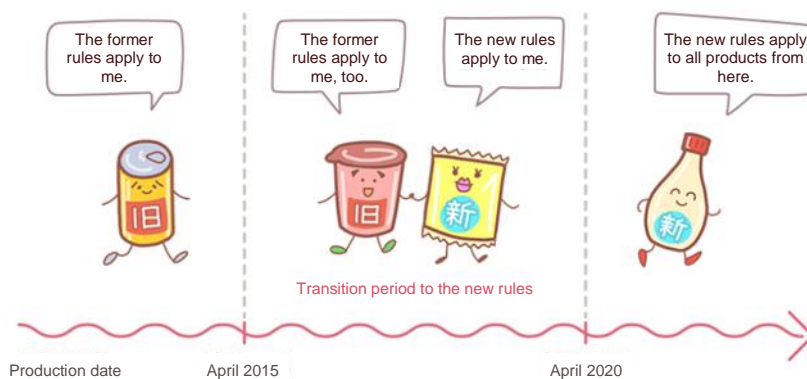


Figure 5 Rules for labeling on allergens

Source: the JCCU Website “Labeling on allergens” (<https://goods.jccu.coop/feature/promise1/quality/allergy.html>)

4.1-2) Risk communication activities at the local level

[Overview of the Initiative]

JCCU and community-based co-ops work to deepen interactive communication with co-op members and consumers at large.

[Initiative's Outcomes]

Initiatives that had been taken so far are shown as follows.

- Kyoto Co-op
Study meetings on food labeling for children



Source: https://www.kyoto.coop/kumikatsu_report/

- Co-op Yamaguchi
Study meetings with Shoku-no-Kataribe
(speakers about foods)



Shoku-no-Kataribe: Advisors of union-members, who explain basic concepts regarding co-op products and food safety in an easy-to-understand manner from the viewpoints of union members using actual products and home delivery catalogs.

Source: <https://www.yamaguti-coop.or.jp/news/>

- Co-op Nagano
Study meetings on food allergies



Source: <https://nagano.coopnet.or.jp/cam/kosodate/kikaku/gakushukai.html>

- Consumers' Co-Operative Kobe
Work experiences of high school students at
the Commodity Inspection Center



Source: <https://hakarutaisetsu.kobe.coop/event/index.html?126977>

4.2 Submitting Comments and Making Policy Recommendations to the National Government

4.2-1) Submitting public comments and making policy recommendations

[Overview of the Initiative]

JCCU proactively submits comments as called for by concerned government offices to improve public administration in food safety. The Safety Policy Service of JCCU, a unit made up of employees with special knowledge, is responsible for this activity. In submitting such comments, this unit seeks advice from university faculty members and other researchers as necessary.

[Initiative's Outcomes]

Some of the comments JCCU submitted in FY2015 to FY2018 in relation to chemical management are enumerated below. Note that they include comments regarding food.

◇ FY2015

- A public comment to “Draft Risk Assessment Report on asparaginase (enzyme) produced using *Aspergillus oryzae* NZYM-SP strain,” submitted on November 12, 2015
- A public comment to “Draft Risk Assessment Report on diflubenzuron,” submitted on June 24, 2015
- A public comment to “A comment to the Draft Risk Assessment Report on triethyl citrate,” submitted on March 16, 2015
- A public comment to “Designation of canthaxanthin as an additive and establishment of standards and criteria,” submitted on March 16, 2015

◇ FY2016

- A public comment to “Draft of amendment of a part of ‘Standards and criteria for food and food additives, etc.’ in order to revise the Japanese Standards of Food Additives,” submitted on December 28, 2016.
- A public comment to “A comment to the Draft Risk Assessment Report on magnesium stearate,” submitted on December 9, 2016
- A public comment to “Draft Risk Assessment Report on magnesium stearate,” submitted on October 3, 2016
- A public comment to “A comment to the Draft Risk Assessment Report on asparaginase (enzyme),” submitted on January 8, 2016

◇ FY2017

- A public comment to “A comment to the draft of amendment of a part of ‘Standards and criteria for food and food additives, etc.’ in order to revise the Japanese Standards of Food Additives,” submitted on December 21, 2017
- A public comment to “Draft Risk Assessment Report on dexamethasone,” submitted on May 16, 2017

◇ FY2018

- A public comment to “Draft Risk Assessment Guideline Report on feed additives,” submitted on July 19, 2018
- A public comment to “Framework (draft) regarding revision of regulation on food sanitation (amendments draft of the Food Sanitation Act),” submitted on April 4, 2018

Source: The JCCU website http://jccu.coop/food-safety/opinion/opinion_top.html

4.2-2) Submitting comments to prefectural governments on their basic plans for food safety

[Overview of the Initiative]

Community-based co-ops submit comments on draft plans for the monitoring of and guidance on food sanitation of the prefectural governments concerned.

[Initiative's Outcomes]

JCCU submitted 37 comments in total to 16 prefectural governments and 16 cities from Co-ops across the country in response to calling for comments on the FY2019 draft plans for the monitoring of and guidance on food sanitation carried out at the end of FY2019, on December 4, 2019. (Collected and summarized by Union Members' Activities Department of JCCU)

4.3 Developing Human Resources

[Overview of the Initiative]

JCCU holds a regular seminar primarily for those who are involved in the planning of members' activities or who speak on behalf of consumers at councils and view exchange meetings. This seminar is designed for the participants to learn necessary information and exchange views and information among them. The idea is for leading co-op members to deepen their understanding about risks and develop their capacity to serve as risk communicators in their respective communities.

The themes of the seminar revolve around food; some of them are outside the scope of SAICM. However, training risk communicators who are well-versed in the concept of "risk" is deemed to contribute to SAICM. From this perspective, the following paragraphs introduce JCCU's initiatives in human resources development (HRD).

[Initiative's Outcomes]

Figure 6 Outline of food safety seminars in 2015 or later

Date	Theme	Number of participants
July 16, 2015	New food labeling system / The System of Foods with Function Claims	37
November 10, 2016	So-called "health food"	22
December 1, 2017	Review of amendment of the Food Sanitation Act including the institutionalization of the HACCP system	22
July 19, 2018	Amendment of the Food Sanitation Act and local food safety administration	23

4.4 Improving the labeling on products based on inquiries and input from consumer members

[Overview of the Initiative]

JCCU makes improvements to the labeling on the products it deals in, based on inquiries and input on their usability and labeling.

Some of these improvements do not necessarily relate to chemicals management. However, efforts to improve the labeling on products based on input from consumers can be good practices for product labeling concerning chemical substances. Accordingly, a few such cases are outlined below:

[Initiative's Outcomes]

The following are three of the cases in which the labeling on products has been improved based on input from consumer members.

- ❖ Warning label for coagulant agent to dispose of waste cooking oil
In order to avoid using the cooking oil again forgetting that you have already put coagulant agent in it, it is clearly displayed that you can prevent accidental eating by putting the empty bag of coagulant agent into the oil after adding coagulant agent.

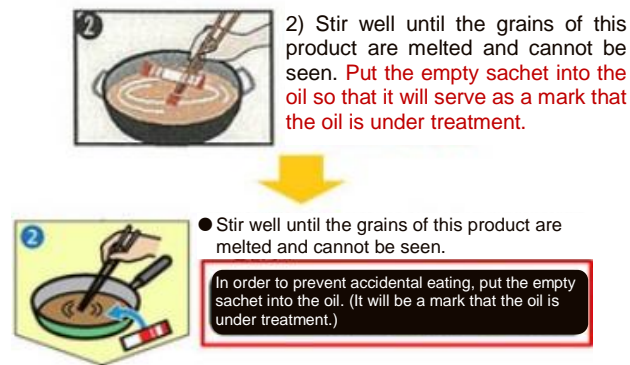


Figure 7 Change of label for coagulant agent to dispose of waste cooking oil
Source: the JCCU Website <https://goods.jccu.coop/voice/improve/detail/post-298.html>

- ❖ Changing the color of the lid of moisture cream
Some customers commented that the shape of a moisture cream container is similar to that of "Cold Cream" in the same line, making it difficult to distinguish. The color of the moisturize cream container has been changed to make it easier to distinguish.



Figure 8 The case where changing the color of the lid made the product easier to distinguish.
Source: the JCCU Website <https://goods.jccu.coop/voice/improve/detail/post-293.html>

- ❖ Adding a window convenient for refilling
A window has been added on the side of the container so as to be able to see how much liquid is filled when refilling. Since softener tends to change in quality, including getting stiff when it is exposed to ultraviolet light, the container of softener did not have a window. After examination such as observing the change using a UV irradiator, it has been confirmed that there is no problem with quality.



Figure 9 Improvement of a refilling bottle
Source: the JCCU Website <https://goods.jccu.coop/voice/improve/detail/post-313.html>

5. Toxic Watch Network Japan (T-Watch)

[About the Organization]

Toxic Watch Network Japan (T-Watch), a non-profit organization, was founded in April 2002 by volunteers from various types of grass-roots and other organizations for the purpose of providing information on chemical substances, and especially on PRTR, to citizens who are laypeople. The impetus for its founding was the inauguration of the PRTR program in fiscal 2001.

T-Watch's action plan consists of providing citizens with easy to understand information on PRTR and other chemical substances primarily via its website, from a neutral point of view, taking citizens' perspectives into account. More recently, it has also conducted fact-finding investigations on pollution by toxic chemical substances and radiation as a result of the Great East Japan Earthquake and published the results of those investigations.

5.1 Organizing citizens' seminars

[Overview of the Initiative]

T-Watch organizes citizens' seminars, albeit irregularly. In these meetings, lecturers invited from other countries report on the latest trends, following by discussions open to the floor.

T-Watch has also participated in the ICCM (International Conference on Chemical Management) every time since the second session, reporting the initiatives of Japanese citizens.

[Initiative's Outcomes or Progress]

In August 2004, T-Watch sent a study mission to North America, which visited NGOs on the US West Coast and in Washington D.C. to learn about their activities and interact with them. Since then, T-Watch has visited NGOs in South Korea and Thailand, and has been working on the 2020 goals as well as dissemination and enlightenment of the PRTR program. T-Watch helped Thai NGOs when the trial of the PRTR program began in Thailand. Some of the past activities of T-Watch in this field are listed below:

Figure 10 Activities of international exchange /international citizen seminar organized by T-Watch

Time	Activities
September 2015	Participated in ICCM4 (held in Geneva)
September 2012	Participated in ICCM3 (held in Nairobi)
May 2011	General meeting commemorative symposium: "Efforts for 'citizens' right to know' concerning chemical substances in Asia and potentials for cooperation among NGOs"
July 2010	Research and exchange of the PRTR program in Thailand
May 2010	Briefing session: "Reporting on T-Watch's interactions with NGOs overseas with focus on chemicals management policies in Asia"
March 2010	Research and exchange of the PRTR program in South Korea
September 2009	International citizens' seminar: How to proceed with international regulations on mercury: attempts in Japan and Asia
May 2009	Participated in ICCM2 (held in Geneva)
February 2009	International citizens' seminar: "Asia and Japan (2): How to manage chemical substances and how to work together"
November 2008	International citizens' seminar: "Asia and Japan: How to manage chemical substances and how to work together"
February 2008	Research and exchange of the PRTR program in Europe (Belgium / Sweden)

Time	Activities
May 2007	Lecture meeting: “Chemicals management systems in Asian countries today”
March 2007	International citizens' seminar: “REACH--the new regulation on chemical substances in Europe--and where Japan and the US are headed on chemical substances” (joint seminar)
August 2004	Research and exchange of the TRI of the US.

5.2 Consecutive study meetings on PRTR

[Overview of the Initiative]

T-Watch organizes consecutive study meetings on PRTR. These meetings provide information on PRTR and the most recent developments surrounding chemical substances. Since 2015, T-Watch has been organizing consecutive study meetings where citizens study basic science for improving their understanding of chemical substances.

[Initiative’s Outcomes]

The consecutive study meetings on PRTR are listed in Figure 2 below:

Figure 11 Consecutive study meetings on PRTR organized by T-Watch

Time	Activities
September to December 2019	Basic course of chemistry for citizens: Thinking about the current status and issues (5 lectures)
July 2019	Meeting to exchange opinions on the 2020 goals and global trends of SAICM
March 2019	Review meeting on the 17th compiled data released by the national government
October 2018 to January 2019	Consecutive course - Thinking about health effects of chemical substances (4 lectures)
March 2018	Review meeting on the 16th compiled data released by the national government
November 2017 to February 2018	Course for thinking about safe water environment and circulation (2 lectures)
March 2017	Review meeting on the 15th compiled data released by the national government
July to November 2016	Basic course of chemistry for citizens (5 lectures)
March 2016	Review meeting on the 14th compiled data released by the national government
September 2015 to January 2016	Course for safety in everyday life, learning from history (5 lectures)
March 2015	Review meeting on the 13th compiled data released by the national government
April 2014	Review meeting on the 12th compiled data released by the national government
March 2013	Review meeting on the 11th compiled data released by the national government
May 2012	Symposium: Risk communication on PRTR: A ten-year history and the future
March 2012	Review meeting on the 10th compiled data released by the national government
July 2011	Study meeting on chemical releases due to the Great East Japan Earthquake and the PRTR system
March 2011	Review meeting on the 9th compiled data released by the national government
May 2010	Symposium: “To what extent is PRTR data utilized now?”

Time	Activities
March 2010	Review meeting on the 8th compiled data released by the national government
June 2009	Systems for Calculation, Reporting and Public Disclosure of Greenhouse Gas Emissions
May 2009	Where will the initiatives to realize an Earth free from chemical pollution as seen in COP4 and ICCM2 regarding POPs go?
March 2009	Review meeting on the 7th compiled data released by the national government
May 2008	What should be done about chemicals management? Suggestions from citizens towards amending the Chemical Substances Control Law
March 2008	Review meeting on the 6th compiled data released by the national government
March 2007	Review meeting on the 5th compiled data released by the national government
February 2007	Ink and the printing industry
September 2006	Symposium: What should be done about chemicals management in Japan?--Suggestions from citizens
May 2006	PRTR and risk communication

5.3 Initiatives for the 2020 goals

[Overview of the Initiative]

T-Watch promptly publishes the database for searching PRTR-published data in Japan on its website. T-Watch provides information, popularizes the issues, and raises awareness on the progress of the SAICM National Implementation Plan of Japan and the Minamata Convention on Mercury, which are being implemented to achieve the 2020 goals regarding chemical substance management. The NPO conducts questionnaire surveys to all stakeholders, grasps the current situation and issues, and raises the issues.

[Initiative's Outcomes]

The database for searching PRTR posted by T-Watch is linked to a database where you can search the data of reported greenhouse gas emissions as well. The URL is <https://prtr.toxwatch.net/>

In addition, the reports on the results of questionnaire surveys to stakeholders regarding SAICM National Implementation Plan of Japan are as follows. Since fiscal 2015, T-Watch has been organizing 10 regional seminars to achieve the 2020 goals.

Figure 12 Outline of regional seminars organized by T-Watch for achieving the 2020 goals

Time	Activities
March 2019	Report of public awareness survey on SAICM National Implementation Plan of Japan
March 2018	Report of local government survey on SAICM National Implementation Plan of Japan
March 2017	Report of questionnaire survey on domestic products containing mercury and toxic chemicals at home
March 2015	Report of questionnaire survey on mercury-containing products at home
July 2013	Ten years of reduction of hazardous substances promoted by citizens - the PRTR and future challenges
March 2013	Utilization of PRTR information in the community - Recommendations based on report of local government survey and good practices
September 2010	The Pollutant Release and Transfer Register (PRTR) in Japan and Korean Toxic Releases Inventory (TRI)-an evaluation of their operation (report on explanation of PRTR in Japan and South Korea and its evaluation - English)