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Greenpeace Intervention on PFOS

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Thank you Madam President.

Although with some limitations, the hazard-based assessment of chemical alternatives to PFOS, its salt and PFOSF, helped identify potential new POPs and therefore helped avoid their replacement by other POPs. It reflects the precautionary approach as set forth in Principle 15 of the Rio Declaration.

Also, we'd like to show our support towards EU's nomination of PFOA.

However, we would like to express several concerns and provide ideas for consideration.

Firstly, through this assessment, there are 2 compounds being identified as substances that the POPRC considered met or might meet all Annex D criteria, i.e. D4 and chlorpyrifos. Based on the precautionary principle and in order to achieve the objective of Stockholm Convention, which is to protect human health and the environment from POPs, we urge Parties to carry out further evaluation on these two alternatives by submitting proposals for listing them in Annexes A, B, and/or C.

Secondly, it has also been noted that, in many cases, relevant information of alternatives are classified as confidential business information. Therefore, about 2/3 of the reported alternatives were considered as substances that are difficult for classification due to insufficient data, including all of the fluorinated alternatives. It highlights the difficulties in the POPs alternative assessment work without sufficient collaboration & contribution from industry stakeholders, who should take responsibility for reducing adverse effects caused by their products and for providing information to users, governments and the public on the hazardous properties of those chemicals.

Furthermore, it has been recognized in Article 9 that "For the purposes of this Convention, information on health and safety of humans and the environment shall not be regarded as confidential." Similar proclamations are also included in the Dubai Declaration on International Chemicals Management declared by stakeholders, including representatives from the private sector.

Therefore, we encourage Parties to contribute to the objective of Stockholm Convention by strengthening their work with the industry to shift the balance from industry's right to confidentiality to the public's right to know about what substances are used in various products and emitted into our environment.

Thirdly, regarding the fluorinated alternatives, they're considered as difficult for classification because of lack of data, which is a situation that must be addressed urgently due to their

increasing production and use as well as sometimes, their extreme pervasiveness. And in fact, for example, Germany's Federal Environment Agency does not consider short chain PFCs as environmentally friendly alternatives due to their high stability and mobility, e.g. their potential to contaminate ground and surface water and enter drinking water. Such concerns are also reflected in the newly published Madrid Statement on PFAS, which has been signed by more than 200 scientists and other professionals from a variety of disciplines.

More importantly, non-fluorinated alternatives are technically and economically feasible, at least for certain sectors listed under specific exemption. As a response to Greenpeace's Detox My Fashion campaign, 20 global fashion brands, 6 Italian fabric suppliers, and four big German supermarkets - which in total take about 10% of the world textile market share - have committed to eliminate all PFCs in all their textile and apparel products by 2020. The German retailers even committed to eliminate PFCs from their carpets and curtains too in the next years. PFCs in these commitments are defined as all poly and per - fluorinated substances and their precursors and metabolites. Among them, 2 brands have already publically announced that all PFCs have been successfully banned in all their products and/or supply chain.

Therefore, we'd like to urge the Parties to take note of the availability and feasibility of non-fluorinated alternatives and stick to the precautionary approach to ensure that one problematic group of chemicals is not simply replaced with another.

Last but not the least, it has been noted that non-chemical alternatives are listed in the appendix but not assessed in the report since the methodology is applicable to chemical substances only. This might leave a misleading impression that focus is mainly on drop-in replacement chemical additives, whereas in practice innovative changes in the design of products, industrial processes and other practices are very crucial in achieving the Stockholm Convention objective. Therefore, we would like to encourage POPRC to carry out a more comprehensive review of both chemical and non-chemical alternatives, and by doing so give a strong signal that innovative changes in the design and material use are very crucial alternatives in achieving the Stockholm Convention objective.

Thank you Madam President.