



4 May, 2015

IPEN Intervention on Wastes

Given by Jindrich Petrlik, Arnika, Czech Republic

Thank you Mr. President,

I represent the IPEN, a global network of more than 700 public interest groups in 100 countries. IPEN groups witness severe damage to the environment and negative impacts on human health from wastes containing POPs. We now increasingly find wastes containing PBDEs, polluting recycling chains where they end up in toys or domestic products. In short, POPs wastes represent continuing exposure and must be addressed according to rigorous measures outlined in Article 6.

We would like to express 3 concerns and provide 4 ideas for consideration.

1. One of our greatest concerns with the POPs waste guidelines is that proposed Low POPs Content levels are so high that they do not meet the Convention criteria for protecting human health and environment. Most POPs have a proposed limit of 50 ppm but the draft Guidelines propose 1000 ppm for HBCD and the PBDEs. However, these new POPs are just as hazardous as the old POPs. Even worse, they are more commonly found in our homes and domestic environments. In addition, IPEN believes that even the 50 ppm low POPs content limit should be tightened as it is not a health-based standard and should be much lower considering the properties of POPs. A weak low POPs content limit such as 1000 ppm opens the door for permitting the production and sale of products that contain unacceptably high levels of POPs as contaminants. It also facilitates the export of hazardous, POPs-contaminated wastes from developed to developing countries.

2. The POPs specialists of the Stockholm Convention have given the responsibility for establishing the low POPs content levels to the waste generalists of the Basel Convention. As a result, the guidelines do not match the Stockholm Convention BAT/BEP guidelines. We believe that this should be fixed by having the POPs experts of the Stockholm Convention cooperate with Basel bodies.

3. In cases where wastes such as PCBs and the original POPs are destroyed we find that combustion technologies such as cement kilns or waste incinerators are often promoted even though they are also producers of POPs such as dioxin. These facilities are often promoted as the only solutions but that is not true. Non-combustion technologies are economically viable and technically feasible. The use of solid waste incineration as ESM technology for POPs destruction is inconsistent with the goal of the Stockholm Convention “to continuously minimize releases of” dioxins as unintentional POPs. The proposal to use solid waste incineration for destruction of POPs should be rejected because it is not consistent with the Stockholm Convention BAT/BEP guidelines.

The aims of the Stockholm Convention are “to protect human health and the environment from POPs”  
Achieving this with regards to wastes requires 4 steps:



**a toxics-free future**

- The Stockholm Convention expert groups should review and evaluate the Basel POPs guidelines, especially proposed techniques for destruction efficiencies and their potential to generate unintentionally produced POPs.
- The Basel POPs wastes guidelines should explicitly state that waste incinerators, cement kilns, pulp production, and metallurgical processes are Article 5 source categories for UPOPs and should be avoided for POPs destruction.
- Products containing POPs, and especially those being phase-out like HBCD and recycled under currently permitted exemptions like PBDEs, should be labelled in order to effectively manage the products in waste streams.
- Precautionary and protective low POPs content levels should be established collaboratively by appropriate bodies of both the Basel and Stockholm Conventions, including the POPRC, Toolkit, and BAT/BEP expert groups. No POP should have a limit greater than 50 ppm.

Thank you, Mr. President.