10th Meeting of the Open-ended Working Group of the Basel Convention (OEWG10)

30 May, 2016

IPEN intervention on Low POPs Content Values

Thank you Mr. Chair. I am Lee Bell from IPEN, a global network of 700 public interest groups from 100 countries working for a toxics-free future.

Adoption of a scientifically robust Low POP content value for all POPs waste is urgently required for the long-term protection of human health, ecological integrity and protection of global biodiversity. The development of the Basel and Stockholm Conventions are a global recognition of the urgency with which we need to address these matters. However, in negotiating the finer technical details of these conventions, sound science and principles of ecologically sustainable development are often compromised by political and economic considerations. IPEN believes that the establishment of Low POPs content thresholds for POPs waste should be based on sound science that is protective of human health, which is directly linked to the relative toxicity of the POPs under consideration. Establishment of Low POPs content levels must not be linked to political, ideological or market considerations or they will be weakened and ineffective. IPEN supports the statement of the OEWG 10 Co-Chair that “We are only here for the environment not for the economy.” We also support the comment by Norway and South Africa that these Low POPs content values should be as low as possible.

The Basel technical guidance on POPs waste, and especially Low POPs concentration thresholds, must reflect levels that will not exacerbate the global distribution of POPs through recycling activities and ESM guidance. If Low POPs levels are adopted that are too high, they will not protect human health or the environment and will lead to the poisoning of the circular economy while it is still in its infancy.

While some delegates may look at these issues through the lens of short-term market impacts or political considerations, IPEN is of the view that increasing the long-term exposure of children and vulnerable populations to POPs through recycling POPs waste into consumer products is unacceptable and completely avoidable. If our starting point on establishing Low POPs content levels is to minimise financial impacts on specific industry sectors or to create politically palatable policy, then the result will not protect our children or ecosystems and we
will fail our mandate. A substantial range of studies are now available, including studies by IPEN and our associated organisations, demonstrating that recycling of POPs-contaminated plastics is leading to POPs being transferred into consumer goods, including children’s toys, at levels of concern. Increasing children’s exposure to POPs through weak Low POPs content thresholds that allow recycling of POPs contaminated wastes is contrary to the intent of the Basel and Stockholm Conventions.

Based on these studies, IPEN believes that lower Low POPs Content Levels for brominated flame retardants (50 ppm for PBDEs and 100 ppm for HBCD) should be chosen as more appropriate and health- and environmentally-protective ones.

Also, the level for PCDD/Fs should be set at a lower level than it is now, and IPEN suggests a level of 1 ppb (1ng/g) in agreement with the previously proposed option by BiPRO consultants in their report for the European Commission.