

Quick Guide to IPEN Views on Matters to be discussed at POPRC4

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Conflict of interest policy

IPEN welcomes the revised declaration form but believes that further action is required by the Committee on this critical topic. IPEN recommends that a working group be established to develop amendments to the rules of procedure for possible consideration by COP4. The amendments should strengthen the Declaration and develop some additional procedures to insure the integrity of the POPRC.

Toxic interactions

The exposure or hazard assessment section of the Risk Profile should include available studies on toxic interactions involving substances under review. Toxic interactions should also be taken into account when attempting to draw conclusions from comparisons of lab-derived effect levels and seemingly low levels in the environment.

Handbook

IPEN believes it is extremely important for the Handbook to accurately reflect the fundamental difference between listing in Annex A and Annex B. The goal of Annex A is elimination. The goal of Annex B is restriction, implying continued use. Annex B is best suited to substances that have an essential public health use or some other equivalently essential use since this type of listing restricts uses instead of eliminating them. All issues regarding phase-out periods or exemptions for specific uses can be handled in Annex A.

Octabromodiphenyl ether (octaBDE)

The c-OctaBDE Risk Profile concluded that the hexaBDE and heptaBDE components of the mixture are POPs. The POPRC also noted “the increasing evidence related to debromination of Octa and Nona BDE into BDEs with POPs properties...” For these and other reasons, the Committee made the precautionary decision that global action is warranted for c-OctaBDE, and it advanced the evaluation of c-OctaBDE to Annex F. IPEN suggests that bromodiphenyl ethers containing six, seven, eight, and nine bromines be listed in Annex A without any specific exemptions. This might be done using the following markers for enforcement purposes: BDE153 (hexaBDE); BDE175/183 (heptaBDE); BDE196, BDE197, BDE203 (octaBDE); and BDE206, BDE207 (nonaBDE). Currently, there are brackets around the draft risk management evaluation text that proposes listing OctaBDE in Annex C. This is because the science relating to the debromination of decaBDE and how it affects the unintentional formation of c-OctaBDE components is new and still developing. Therefore it appears the Committee may need more time to address this topic in a scientifically responsible way in order to make a well-thought out decision on an Annex C listing. IPEN suggests that while the Committee should be able to recommend to COP4 to list c-OctaBDE in Annex A, the POPRC may need more time for a thorough investigation of the relevance of debromination to an Annex C listing for c-OctaBDE. Therefore, IPEN proposes that the Committee request that the COP authorize it to continue giving consideration to a possible recommendation for also listing c-OctaBDE in Annex C due to its unintentional production.



Pentachlorobenzene (PeCB)

PeCB should be recommended for listing in Annex A and Annex C. Listing in Annex A without specific exemptions will control possible intentional sources and listing in Annex C will control unintentional formation and release through the Convention's BAT/BEP guidelines.

Alpha and Beta hexachlorocyclohexane (alphaHCH and betaHCH)

AlphaHCH and betaHCH should both be recommended for listing in Annex A without any specific exemptions.

Short-chained chlorinated paraffins (SCCPs)

SCCPs meet both Annex D and Annex E criteria and should move forward to Annex F evaluation. Concerns at POPRC3 over long-range environment transport and toxicity have been addressed in the revised Risk Profile. SCCPs are present in Arctic lake sediments and Arctic marine mammals, which are in turn food for northern Indigenous Peoples. SCCPs have been measured in human breast milk both in temperate and Arctic populations. SCCPs are particularly toxic to aquatic invertebrates. Additionally, Indigenous Peoples in the Arctic who consume contaminated animals may be exposed to SCCPs at concentrations greater than the WHO health guideline for neoplastic effects. Finally, the risk profile states that "simultaneous exposure to SCCPs and to the related medium chain chlorinated paraffins (MCCPs) would increase the risks because of similar toxicity profiles of SCCPs and MCCPs." This link to toxic interactions further supports application of the precautionary approach and sending SCCPs to Annex F evaluation.

Endosulfan

Endosulfan meets the Annex D screening criteria and should move forward to Annex E evaluation. Note that endosulfan has a great potential to bioaccumulate in terrestrial species because of its high log K_{OA} (>10 for alpha and beta isomers), with predicted biomagnification factors in wolves of 5.3 at age 1.5 years, 17.9 at 2.25 years and of 39.8 at 13 years (Kelly & Gobas 2003, supporting data). The biomagnification factor for other herbivorous and carnivorous terrestrial species is calculated as ranging from 2.5 to 28 (Kelly et al 2007). Endosulfan residues are also commonly found in human placental tissue, umbilical cord blood and breast milk, and endosulfan is transferred to the foetus and newly-born infant (Cerrillo et al 2005; Fukata et al 2005; Damgaard et al 2006; Torres et al 2006; Shen et al 2007, 2008; Pathak et al 2008). Finally endosulfan is widely present in Arctic wildlife and it is one of the few organochlorines to actually show recent increases in the Arctic.

Hexabromocyclododecane (HBCDD)

HBCDD meets the Annex D screening criteria and should move forward to Annex E evaluation.

New information on PFOS

Since the PFOS Risk Management Evaluation (RME) has already been adopted by the POPRC, the new information presented in INF17 could be added as an annex. IPEN believes all uses of PFOS fit into one of the use categories already identified in the RME. PFOS should be listed in Annex A since it adequately provides for all country specific exemptions while maintaining the Convention goal of elimination.

Documentation process for exemption requests

The POPRC should implement a transparent, reliable and consistent process for evaluating exemptions for certain uses.