



IPEN KEY ISSUES FOR THE 2025 MEETINGS OF THE CONFERENCES OF THE PARTIES TO THE BASEL, ROTTERDAM AND STOCKHOLM CONVENTIONS

The 12th meeting of the Stockholm Convention COP

Listing of chemicals in Annex A of the Convention

Three chemicals/groups of chemicals should be listed in Annex A for global elimination, as recommended by the POPs Review Committee (POPRC):

- Chlorpyrifos
- Medium chain chlorinated paraffins (MCCPs)
- Long-chain perfluorocarboxylic acids (LC-PFCAs), their salts and related compounds

The POPRC has determined that these are persistent, bioaccumulative and toxic POPs that are likely, as a result of long-range environmental transport, to lead to significant adverse effects on human health and the environment, such that global action is warranted.

Recognizing that viable alternatives exist and are in use, no exemptions should be granted for any of the new POPs.

Means of identification of POPs in stockpiles, products and articles in use and wastes

The report from the POPRC clearly shows that Parties are not able to routinely identify POPs in stockpiles, products and articles in use and wastes, and that traceability is very limited. This creates an obstacle to Convention compliance and often leads to POPs containing articles and wastes ending up in developing countries. Evidence of this is also provided in another meeting document: the evaluation and review of brominated diphenyl ethers.

Therefore, Parties must take steps to ensure traceability of POPs, including for future listings under the Convention, and to explore how to strengthen global cooperation and harmonization. The COP should, for example, adopt a decision that mandates the POPRC do further work on the topic, including in evaluations of exemptions and through notifying the newly established Compliance Committee. For more information, see [IPEN's Brief](#).

Proposal to amend the listing of UV-328 to include new exemptions

The proposal to open a previous decision by the COP to add a new exemption is unprecedented in the history of the Stockholm Convention. This could seriously undermine the integrity of the Convention and the listing of UV-328 in Annex A as decided by the Conference of the Parties in 2023 and thus should not be reopened.

BAT BEP POPs contaminated sites guidance

The BAT BEP Guidance on the management and sustainable remediation of sites contaminated with POPs has been developed since 2016 and is now finalized and will be presented at the COP. The guidance is designed for Parties who have yet to develop a framework for contaminated sites management and includes technical, legal, policy, and financial guidance for site clean-up. It emphasizes sustainable remediation using non-combustion technologies and techniques to avoid generation of further unintentional POPs (UPOPs). Parties should be encouraged to welcome/adopt the guidance.

The 17th meeting of the Basel Convention COP

Technical guidelines on POP waste

Wastes that are defined as POPs waste under the Convention must be disposed of so that the POPs content is destroyed or irreversibly transformed. The Low POP content level is a threshold that defines when a waste is a POPs waste and not. If the level is high, this means that wastes containing high levels of POPs can still be treated as non-hazardous. Therefore, the Low POP content levels should be kept as low as possible.

IPEN proposes the following levels be adopted:

- PCDD/Fs and PXDD/Fs 1 ppb in TEQ (1 microgram/kg in TEQs)
- Dechlorane Plus 10 ppm (10 mg/kg)
- UV-328 15 ppm (15 mg/kg)
- Chlorpyrifos 50 ppm (50 mg/kg),
- MCCPs 500 ppm (500 mg/kg)
- PBDEs – 200 ppm (200 mg/kg) as a sum.

The POP waste Small Intersessional Working Group (SIWG) are considering a new process to review and include new technologies for POP destruction in the technical guidelines. Parties should be encouraged to support this process and submit information to the SIWG on any non-combustion technologies operating in their country that are not already included in the POP waste technical guidelines. In particular, countries using Mechano-chemical destruction (MCD) for contaminated site remediation or POPs destruction should support its inclusion during SIWG comment periods before and after the COP. Countries that have or are using this technology include Japan, China, Viet Nam, The Netherlands and the Philippines.

Other POP technical guidelines

Three other updated POP technical guidelines (TGs) have also been recommended for adoption.

- Technical Guidelines on Brominated POP waste (hexabromodiphenyl ether and heptabromodiphenyl ether, or tetrabromodiphenyl ether and pentabromodiphenyl ether, decabromodiphenyl ether or Dechlorane Plus)
- Technical guidelines on POP pesticide waste.
- Technical Guidelines on UV-328 wastes.

The adoption of these guidelines should be supported. Further work may need to be undertaken on the UV-328 guidelines to identify non-combustion technology to destroy UV-328 waste.

Other technical guidelines

Three additional technical guidelines will be reviewed.

- Waste tyres
- Waste lead acid batteries
- Other batteries (including lithium-ion batteries)

These should not be adopted at this COP as they all need more work, for example, to include more information on chemical content and hazard and their impact on human health and the environment.

Further consideration of plastic waste

The work under this item will focus on proposed additional work on plastic waste. One proposal is to establish an SIWG to conduct an effectiveness evaluation of the plastic waste amendments, which may include the effectiveness of the plastic waste technical guidelines. This should be supported. It is also an opportunity to ensure that Refuse Derived Fuel (RDF) is classified as a plastic waste (Y48 or A3210) for the purpose of transboundary movement and not a product or non-waste.

In addition, some Parties have proposed to submit information on and consider chemical recycling (currently bracketed Section G and Appendix A of the plastic waste guidelines). However, as noted by other Parties, opening up the plastic waste technical guidelines is premature, and should not be supported.

The 12th meeting of the Rotterdam Convention COP

The Rotterdam Convention is an important tool to empower countries to control what chemicals come in over their borders, as is their sovereign right. This is achieved by listing chemicals in Annex III of the Convention, which mandates that Prior Informed Consent (PIC) is required before export of these chemicals. Parties can still import these chemicals since this does not constitute a prohibition of trade.

Unfortunately, a few Parties have blocked the listing of several chemicals for many years, despite these meeting all the Convention criteria. The lack of controls on export of these chemicals has led to harm to human health and the environment and the COP should follow the recommendation by the Chemicals Review Committee to list the following ten chemicals in Annex III:

Acetochlor, carbosulfan, chlorpyrifos, chrysotile asbestos, fenthion, iprodione, liquid formulations containing paraquat dichloride, mercury, methyl bromide, and paraquat.