

Under the Stockholm Convention, Parties are required to develop strategies to identify products, articles, stockpiles and wastes that contain persistent organic pollutants (POPs). But there are significant challenges for Parties to fulfil their convention obligations in relation to traceability of POPs, including to identify stockpiles, articles in use, and wastes that contain POPs. At the 11th Conference of the Parties (COP) in 2023, during the evaluation of proposed exemptions for UV-328 and Dechlorane Plus, countries discussed these challenges and asked for recommendations for “means of identification” for POPs, since it is not possible for Parties to know whether POPs may be in these materials without methods that ensure traceability.

The POPs Review Committee (POPRC) was therefore requested to “consider options for identifying persistent organic pollutants in stockpiles, products and articles in use and in wastes and issues related to the production, import and export of products and articles containing persistent organic pollutants”. The report of their work (UNEP/POPS/COP.12/INF/26) has been submitted for consideration at the twelfth meeting of the COP in 2025 and contains several important observations regarding the identification, management, and regulation of POPs within global value chains. Among other things, the POPRC notes that:

- “Identifying POPs in products and articles is crucial for their environmentally sound management (ESM) at all stages of the lifecycle including within products, articles, stockpiles and waste.”
- “Enhanced transparency and traceability, through better labelling and information systems, are widely considered necessary. Harmonising regulations and standards globally could reduce financial burdens and improve compliance.”
- “Detailed labelling, including digital product passports, is advocated to provide comprehensive information on POPs. This could simplify international trade and align reporting requirements.”

PARTIES RESPONSIBILITIES FOR IDENTIFICATION OF POPS UNDER THE CONVENTION

To ensure compliance with other responsibilities under the Convention, such as the elimination of the use, export, and import of listed chemicals and the management of stockpiles in an environmentally sound matter, it is important that Parties can identify stockpiles, products, and articles in use and wastes that contain POPs. Responsibilities regarding identification of POPs for Parties to the Convention are also outlined in the [text of the Convention](#), for example, in:

- Article 6 which requires, among other things, that Parties develop strategies to identify stockpiles, products and articles in use and wastes consisting of, containing, or contaminated with chemicals listed in Annex A, B or C, and;
- Article 9 on information exchange, which requires that each Party “shall facilitate or undertake the exchange of information relevant to: (a) the reduction or elimination of the production, use and release of persistent organic pollutants...” (subparagraph 1) and states that “[f]or the purpose of this Convention, information on health and safety of humans and the environment shall not be regarded as confidential” (subparagraph 5).

Explicit labelling requirements are also included in the listing decisions for some POPs, such as Polychlorinated biphenyls (PCBs), Hexabromocyclodecane (HBCD), and Pentachlorophenol (PCPs), its salts and esters.

ENSURING TRACEABILITY OF POPS THROUGHOUT THEIR LIFE CYCLE HELPS REDUCE COSTS AND IMPROVE IMPLEMENTATION OF THE CONVENTION

IPEN has previously shown that lack of traceability of POPs lead to their continued circulation, for example through recycling, which in general is not allowed under the Convention, as per Article 6 d. IPEN studies have also shown that the lack of traceability contributes to the continued presence and human exposure to these toxic chemicals, including in toys, which further jeopardizes human health and the environment.

While analytical techniques are important for monitoring, they are mostly limited to a small subset of specific POPs and most of the techniques are time consuming and expensive. Relying on downstream analytics often undermines the implementation of the Convention and shifts the responsibility and management costs to importing countries. Instead of relying on costly and impractical downstream testing, standardizing and streamlining global methods of tracking POPs from their origin through their life cycle via labeling, digital tracking, and other means can improve compliance to the Convention. The report from the POPRC notes that:

“Standardised labelling systems and enhanced information sharing across value chains are largely advocated to streamline labelling efforts globally and improve POPs management as well as saving time and costs for companies that do not have to comply with multiple systems unique to companies or jurisdictions.”



While there is little transparency and traceability in place for POPs, labelling systems are already in place for other purposes, illustrating their feasibility. For example, cables are regularly marked to show their compliance with different standards and to provide information to users. Foods are labeled to show compliance with nutritional and other guidelines and to inform consumers, including when invisible food additives are ingredients in products.

Article Name	Other article identifiers	Article category	Last update	Details
Z Türverkleidung hi	Other: 1544348575 Part number: 9J1.867.211.FS.BG0	8708999790 - SECTION XVII (86 - 89) Vehicles, aircraft, vessels and associated transport equipment > VEHICLES OTHER THAN RAILWAY OR TRAMWAY ROLLING STOCK, AND PARTS AND ACCESSORIES THEREOF > Parts and accessories of the motor vehicles of headings 8701 to 8705 > Other > Other > Other	23-maj-2022	
PCB plug	Item number: 1808530	8536699000 - SECTION XVI (84 - 85) Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > ELECTRICAL MACHINERY AND EQUIPMENT AND PARTS THEREOF; SOUND RECORDERS AND REPRODUCERS, TELEVISION IMAGE AND SOUND RECORDERS AND REPRODUCERS, AND PARTS AND ACCESSORIES OF SUCH ARTICLES > Other > Other	18-aug-2022	
PUMP DC-B 48V-3 PJ30511-940.5	Part number: 310337/135669	8413500000 - SECTION XVI (84 - 85) Machinery and mechanical appliances; electrical equipment; parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts and accessories of such articles > NUCLEAR REACTORS, BOILERS, MACHINERY AND MECHANICAL APPLIANCES; PARTS THEREOF > Other reciprocating positive displacement pumps	27-jan-2025	
VM1C.	Part number: 1294664	9026808000 - SECTION XVIII (90 - 92) Optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus; clocks and watches; musical instruments; parts and accessories thereof > OPTICAL, PHOTOGRAPHIC, CINEMATOGRAPHIC, MEASURING, CHECKING, PRECISION, MEDICAL OR SURGICAL INSTRUMENTS AND APPARATUS; PARTS AND ACCESSORIES THEREOF > Instruments and apparatus for measuring or checking the flow, level, pressure or other variables of liquids or gases (for example, flow meters, level gauges, manometers, heat meters), excluding instruments and apparatus of heading 9014, 9015, 9028 or 9032 > Other instruments or apparatus > Other	20-dec-2023	

Databases of chemical content also already exist, both as internal industry databases and regional public databases, such as the SCIP database in the EU.

IPEN RECOMMENDATIONS

The report from the POPRC clearly shows that Parties are not able to routinely identify POPs in products, articles, in use and wastes. It also shows that ensuring traceability of POPs throughout their life cycle would help reduce the costs that would otherwise be associated with analytical methods and improve implementation of the Convention. IPEN therefore recommends that:

- **For future listings, including listings considered at COP-12, Parties should:**
 - Ensure that listings are accompanied with a **specific requirement for means of identification**, especially for substances that have associated exemptions. When such traceability is required, submissions from countries to the POPRC showed that the implementation of the Convention improves. To streamline the listing process, the COP should mandate the POPRC includes specific requirements for means of identification when considering exemptions and recommendations in its POPs evaluation process.
 - **Limit exemptions** to justified, narrow, time-limited applications that are necessary for the functioning of society so that the volumes of stockpiles, products in use, and wastes that need to be traced and managed are minimized and to ensure that the Convention fulfils its purpose of global elimination of POPs.
- Parties should also explore how to **strengthen Global Cooperation and Harmonization**, for example by mandating POPRC to do further work on:
 - How to ensure **that transparency and traceability requirements are harmonized globally**, and how to introduce mandatory requirements for transparent labelling of POPs-containing products, including digital information accessible to stakeholders throughout the value chain.
 - **Harmonized Identification Systems:** Explore how harmonized, global use of tools such as the Harmonized Commodity Description and Coding System (HS) and other digital tracking systems can be implemented to improve the global identification and traceability of POPs in products, articles, and wastes.
- Noting the overall challenges for Parties of the Convention to be able to comply with their obligations related to traceability of POPs, Parties should also consider notifying the newly established [Compliance Committee](#), whose mandate includes examining systemic issues of general compliance and implementation and whose objective is to assist Parties to comply with their obligations under the Convention.