

## **IPEN Intervention on 'Low POPs' - 26<sup>th</sup> April 2011**

Article 6 of the Stockholm Convention requires each Party to develop and implement strategies to identify POPs stockpiles, and to develop strategies for identifying products in use that contain or are contaminated with POPs and POPs-containing wastes. The establishment of a 'low POPs' limit is fundamental to this obligation as, simply put, it sets the concentration limit above which POPs must be destroyed or irreversibly so that they do not exhibit the characteristics of persistent organic pollutants. The level at which the limit is set will clearly have a profound influence the total quantity of POPs which will be ultimately be addressed by the Convention.

Article 6 further requires that the 'Low POPs' limit should be established by this Convention in close co-operation with the appropriate bodies of the Basel Convention. In practice, however, this important issue has been left exclusively to the Basel Convention. That Convention has now spent nearly a decade working on this matter but has been unable to move beyond the establishment of provisional levels. Unfortunately no progress has been made in moving the process forward in recent years.

Furthermore the implementation of the Convention has already been prejudiced by the provisional concentration levels being set far too high. In relation to dioxins and furans, for example, that almost all wastes have been effectively defined as not being POPs wastes. This is clearly not consistent with the promise of POPs elimination nor with the principal aim of the Convention which is to protect human health and the environment. It also undermines the requirement to give priority consideration to alternative processes as under this permissive definition even the residues from processes in Annex C Part 2 appear to contain no Unintentional POPs.

The scale of this task has increased significantly with the listing of the nine new POPs by COP4 and urgent action is now needed if the Convention is to be effective in delivering the promise of the elimination of POPs.

IPEN considers that the resolution of this problem presents an excellent opportunity to fully use the expertise available to the Conventions as part of the synergy process. We note that in the POP Review Committee the Stockholm Convention has an excellent and highly qualified expert body with particular familiarity with the hazards associated with the new POPs. This expert group has much to offer the appropriate groups of the Basel Convention in helping to establish low POPs levels and in the spirit of synergies we would suggest that a sensible way forward for the COP could be to offer the expertise of the POPRC by cooperatively convening a joint meeting of the appropriate subsidiary body of the Basel Convention with the POPs Review Committee of the Stockholm Convention with the aim of early completion of this long unfinished business.

We are grateful for the consideration of our suggestion by the COP.

Thank you very much.