IPEN Brief: Short Chained Chlorinated Paraffins (SCCP)

Delegates from Parties to the Basel Convention will meet in Geneva from September 3-7, 2018 to make decisions on hazardous waste limits. The eleventh meeting of the Basel Convention Open Ended Working Group (OEWG) will discuss a range of hazardous waste issues including Persistent Organic Pollutant (POPs) waste, e-waste and plastic waste. One of the most important decisions will be on threshold limit concentrations that define POPs waste – the most toxic form of waste that exists. A decision on one specific POP known as Short Chained Chlorinated Paraffins (SCCPs) will be critical and all delegates should be aware of the implications. The issues around this highly toxic POP are set out below.

SCCPs are toxic

SCCPs are toxic to aquatic organisms at low concentrations, disrupt endocrine function, and are suspected to cause cancer in humans. SCCPs are used as flame retardants in PVC products along with their primary use as lubricants in metal cutting. According to a recent scientific paper, *"no other persistent anthropogenic chemical has been produced in such quantities [as SCCPs]"* and there is some indication that production is increasing.

SCCPs are listed in the Stockholm Convention for global elimination

At COP8 in 2017, governments agreed to list SCCPs in the Stockholm Convention for global elimination. This establishes SCCPs as one of the world's worst chemicals.

The Stockholm Convention requires hazardous waste limits

Listing a chemical for global elimination prohibits production, use, import, and export. It also requires dealing with wastes. The Convention requires that after the treatment of POPs waste, it should no longer exhibit POPs characteristics. The "low POPs content" defines the level at which wastes must be treated according to stringent Stockholm Convention obligations to destroy their POP content. Wastes with POPs below the low POPs content level are considered "clean" by the treaty. Most substances listed in the treaty have a low POPs content level of 50 ppm – a level that is still is too high because these wastes are highly hazardous, can contribute to the long-range transport of POPs, and can cause serious harm to public health and the environment. The Stockholm Convention works with the Basel Convention to develop these limits.

The EU is promoting the weakest hazardous waste limit in the history of the treaty

In contrast to a limit of 50 ppm for most substances listed in the treaty, the EU is proposing a limit of 10,000 ppm for SCCPs at the Basel OEWG11. This is the weakest proposal for a hazardous waste limit in the history of the Basel and Stockholm Conventions. Presumably, the EU is proposing this unprotective limit because it is present in EU legislation. The EU is, in effect, seeking to globalize a weak standard that does not protect its own residents.

SCCPs are widely present in children's toys and in food contact materials
SCCPs already represent a threat to human health due to their wide presence in consumer products, including on the EU market. In 2017, an IPEN survey revealed the presence of SCCPs in children's products. Ninety-six percent of toys with measurable concentrations of SCCPs contained levels of 10 ppm or greater. Consumer products on the EU market with SCCPs greater than 10 ppm included wall paper (56.6 ppm), a gym ball for children (9715 ppm), and a ball for children with figures from the movie, "Frozen" (102 ppm). Under the EU's weak low POPs content proposal, none of these products would be subject to Stockholm Convention obligations when becoming wastes. Other children's products containing SCCPs were found in Brazil, Canada, China, India, Japan, Kenya, Russia, and USA.

Implications of the EU proposal

- Significant new releases of POPs with accompanying threats to environmental health will occur, since wastes with these high levels of SCCPs will be considered "clean."
- Poisoning the circular economy since plastics containing SCCPs less than 10,000 ppm would be considered "clean" and could be used for recycling, thus further dispersing SCCPs into products, including children's products and food contact materials.
- Opening the door to dumping of wastes with very harmful SCCPs levels in developing and transition countries that cannot measure or manage them.
- Discouraging implementation of superior waste disposal techniques that can destroy all POPs content.
- Normalizing reckless low POPs content levels in the Stockholm Convention that undermine the objectives of the treaty.

What the OEWG 11 should do

1) Prioritize protection of human health and the environment by supporting a low POPs content limit of 100 ppm for SCCPs.

2) Support more protective low POPs content limits for other substances:

- 1 ppb (= 1 ng/g WHO-TEQ) for PCDD/Fs + dl-PCBs
- 100 ppm (= 100 mg/kg) for hexabromocyclododecane (HBCD)
- 50 ppm (= 50 mg/kg) for sum of polybrominated diphenyl ethers or PBDEs (including Deca-BDE). This equates to 10 ppm for Deca-BDE.