QUICK VIEWS FOR THE CONFERENCES OF THE PARTIES TO THE STOCKHOLM, BASEL AND ROTTERDAM CONVENTIONS 2025

APRIL 2025

The following is a summary statement of IPEN's views on issues that the 2025 Conferences of the Parties to the Stockholm, Basel and Rotterdam Conventions (BRS COPs) will consider.

TWELFTH MEETING OF THE CONFERENCE OF THE PARTIES TO THE STOCKHOLM CONVENTION

LISTING OF CHEMICALS IN ANNEX A OF THE CONVENTION

The POPs Review Committee (POPRC) has determined that three persistent, bioaccumulative, toxic POPs 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. The most effective means to protect human health and the environment from the risks associated with these POPs is a complete prohibition on their production, sale, and use.

- The COP should list these POPs in Annex A for global elimination with no specific exemptions:
  - Chlorpyrifos
  - Medium-chain chlorinated paraffins (MCCPs)
  - Long-chain perfluorocarboxylic acids (LC-PFCAs), their salts and related compounds

Additional information about these POPs is provided in the IPEN guides to the new POPs for chlorpyrifos, medium-chain chlorinated paraffins (MCCPs), and long-chain perfluorocarboxylic acids (LC-PFCAs), their salts and related compounds. Key information is provided below.

Chlorpyrifos

- An organophosphate pesticide used as an insecticide in agriculture and as a biocide to control non-agricultural pests such as termites.
- Widely detected in the Arctic environment and biota at different trophic levels, such as caribou, seals, and polar bears.
- Highly toxic to aquatic organisms, birds, and vertebrates, and an even higher toxicity to insects. There is strong evidence of developmental neurotoxicity in humans, causing for example, reduced IQ, loss of working memory, and attention deficit disorders.
- Due to its high toxicity, concentrations detected in the environment are already sufficient to cause adverse effects.
- Over 50 countries across a wide range of climates, economic development levels, and applications have successfully banned chlorpyrifos (fully or partially).
- Alternatives are available for all uses, including non-chemical alternatives, and the phase-out of chlorpyrifos products in a wide number of countries shows that a complete prohibition is feasible.

Medium-chain chlorinated paraffins (MCCPs)

- A large group of high-production volume industrial chemicals that are used as metal working fluids, plasticizers, and additives in plastics.
- Ubiquitous pollutants in the global environment and found in fish, birds, mammals, and humans, including in remote regions.
- MCCPs adversely affect the liver, kidneys, and the thyroid gland in humans.
- Alternatives exist for all uses.
- Should any exemptions be considered, it is important that they are coupled with notes on traceability.
- Concentration limits for what is considered unintentional trace contamination in mixtures of chlorinated paraffins should not exceed 1%.
- To ensure the best protection for human health and the environment from MCCPs and to facilitate implementation and monitoring, the listing should be based on their chemical formula.

Long-chain perfluorocarboxylic acids (LC-PFCAs), their salts and related compounds

- Are or have been widely used in a range of both industrial and consumer applications, including in coatings, cookware, fabric/carpet protectors, textile impregnation agents, production of fluoropolymers, and firefighting foams.
- Also generated during the manufacture of other PFAS, including fluorinated polymers, and during waste incineration.
- Have been detected on all continents and in all environmental compartments.
- Can pass through the placenta into the fetus in humans and be transferred through breast milk. Human adverse effects associated with exposure include liver toxicity, developmental/reproductive toxicity, impacts on the immune system, and endocrine disruption.
- To avoid harmful (so-called "regrettable") substitution, a recommendation not to use PFAS alternatives should be adopted by the COP, as was previously done for PFOA and PFHxS.

PROPOSED EXEMPTIONS FOR THE NEW LISTINGS

There are suggested exemptions for all the POPs recommended for listing despite the known viable alternatives that exist and are in use. Therefore, no exemptions should be granted. However, if exemptions are considered, it is important that:

- They should only be for narrow, justified, and clearly defined applications.
- Industry should be required to provide data with full justification, proof of inability to substitute, and a time frame for removal from the market.
- No exemptions for production and/or use should be granted from the outset for more than five years, as laid down in Article 4 of the Convention.
- An explicit decision should be adopted by the COP to schedule an evaluation process of the need to extend any of the granted exemptions beyond five years.
- Any exemptions should be coupled with notes on means of identification to ensure traceability and transparency of the presence of the POP in articles, stockpiles and wastes.

For further details, see the IPEN brief "Ending Toxic Exemptions" and the Guides to the new POPs.

OPTIONS FOR IDENTIFYING POPS IN STOCKPILES, PRODUCTS AND ARTICLES IN USE AND WASTES

The report from POPRC (UNEP/POPS/COP.12/INF/26) 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 cycles would help reduce costs for chemical analysis and improve implementation of the Convention. Therefore, based on the information in the report, Parties should:

- Accompany listings with a mandatory requirement for identification of POPs in products and articles in use, making this information accessible to stakeholders throughout the value chain, and mandating the POPRC to include this aspect during the evaluation of POPs for listing.
- Explore how to strengthen global cooperation and harmonization, for example, by mandating POPRC to do further work on how international systems such as the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), digital tracking systems, and labelling can be utilized for improving the global identification and traceability of POPs in products, articles and wastes.
- Notify the Compliance Committee of the challenges for Parties to be able to comply with their obligations related to traceability of POPs so the Committee can provide assistance.

For further details, see the IPEN brief "From Hidden Hazards to Open Data: Advancing Traceability and Transparency for POPs."

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 and should not be supported, regardless of reason, since this would create a dangerous precedent and would weaken the Convention in several ways, including by:

- Conveying that no listing can ever be seen as final, weakening the effectiveness of the Convention and creating uncertainty for policymakers, manufacturers, and waste management sectors.
- Increasing administrative burdens on countries that have already included the listed POPs in their National Implementation Plans.
- Disadvantaging companies and countries that have already started or completed phase-ins of safer alternatives.
- Disincentivizing companies from developing and advancing safer alternatives.
- Straining the resources of the Convention, including the BRS Secretariat and the POPs Review Committee, and slowing down the listing of new chemicals.
- Conveying that new proposed uses of old POPs would be considered.
- Undermining the effective use of project resources such as GEF funding to address POPs and POPs wastes.

For further details, see the submission by IPEN and Alaska Community Action on Toxics (ACAT).

RULES OF PROCEDURE FOR THE CONFERENCE OF THE PARTIES

The Rules of Procedure for the Stockholm Convention COP were adopted in 2005. However, Rule 45.1 was left in brackets.

- Parties should support the effective operation of the Convention by removing the brackets in Rule 45.1 to permit voting when all efforts at consensus have been exhausted. This will help avoid deadlocks created by a single or a few Parties.

DDT

DDT was one of the initial "Dirty Dozen" POPs listed under the Convention in 2001. It was added to Annex B, restricting its production and use, but with disease vector control as an acceptable purpose for continued production and use. A public DDT register with Parties using DDT for the acceptable purposes was established. The need for continued use of DDT will be addressed at the COP.

- The production and use of DDT should be eliminated globally.
- The 13 countries remaining in the DDT register should discontinue their use of DDT and withdraw from the list by the end of 2025.
- Any remaining Parties should provide information to the Secretariat as requested in the DDT questionnaire and develop a rapid phase-out plan.
- Non-combustion methods of DDT destruction should be promoted by UNEP and used for DDT stockpiles.

POLYCHLORINATED BIPHENYLS (PCBS)

PCBs were listed in Annex A and C of the Stockholm Convention in 2001 with the goal of a complete phase-out by 2025 and the destruction of PCB stockpiles in an environmentally sound manner no later than 2028. However, only an estimated 30% of Parties are on track to meet the 2025 phase-out date, and only 20% of PCBs global stockpiles have been destroyed. Globally, over 10 million tonnes of PCB-containing materials remain to be destroyed.

- The strategy for Parties to meet these goals must be ambitious and include all necessary elements to meet these goals, including a focus on non-combustion techniques for destruction.
- Financial constraints and poor inventories have been identified as major barriers to success. Any strategy for diversifying financial resources for PCBs elimination must operationalize the polluter pays principle for the historical producers of PCBs.

EXEMPTIONS FOR HEXA-, HEPTA-, TETRA- AND PENTABROMODIPHENYL ETHER (BDES)

These POPs were listed in Annex A of the Convention in 2009 with a range of exemptions, including for recycling, with no requirements for identification of BDE-containing articles and products. A report is provided to the COP that showcases the consequences of these exemptions, highlighting that developing countries have ended up with large stocks of BDE-containing articles still in use, stockpiled, and in the waste stream, primarily due to past and continuing exports. It also shows that BDEs have become widespread contaminants of recycled plastics, including deca-BDE despite being listed with no recycling exemption.

- Parties should ensure that similar consequences are prevented in future listings by including a requirement for traceability and transparency of POPs in articles still in use, stockpiled, and in the waste stream.
- In addition, the report should be amended by adding at least two important waste management issues that are currently missing:
    - Two non-combustion POPs destruction techniques.
    - A warning about generation of brominated dioxins and dibenzofurans from combustion and incineration of POP-BDEs wastes.

REQUESTS FOR THE EXTENSION OF SPECIFIC EXEMPTIONS FOR PFOS, ITS SALTS AND PFOSF, AND PFOA ITS SALTS AND PFOA-RELATED COMPOUNDS

A request has been submitted to extend the specific exemptions for the use of these PFAS substances for fire-fighting foam for liquid fuel vapor suppression and liquid fuel fires.

- This should not be supported since fluorine-free formulations are available and are as effective as PFAS-based foams. Alternatives meet established performance standards for aviation, military, and industrial applications.

MEASURES TO REDUCE OR ELIMINATE RELEASES FROM UNINTENTIONAL PRODUCTION (I.E., BAT/BEP)

Several guidance documents on best available techniques and best environmental practices relevant for several different POPs are provided to the COP.

- More work is needed to include non-combustion technologies for the destruction of POPs-contaminated wastes instead of the current focus on incineration, co-incineration, or cement kiln disposal.

MEASURES TO REDUCE OR ELIMINATE RELEASES FROM WASTES

Technical guidelines to reduce or eliminate releases from wastes have been developed or updated under the Stockholm Convention, such as guidelines on wastes containing or contaminated with PCBs, BDEs, Dechlorane Plus, UV-328, and others.

- In general, these should be supported but need a greater emphasis on the use of non-combustion technologies for waste treatment.

CONTAMINATED SITES

The finalized BAT/BEP guidance on the management and remediation of POPs contaminated sites focuses on cleaning up POPs contaminated sites with techniques that do not generate POPs. In addition, it also outlines examples of policy, legal, and financial frameworks that are important for a holistic approach to site management.

- To support Parties that have not yet developed a framework to manage POPs contaminated sites or wish to improve their existing framework, this guidance should be welcomed by the COP.

IMPLEMENTATION PLANS AND REPORTING PURSUANT TO ARTICLE 15

Parties are severely lagging in fulfilling their obligations to submit and update National Implementation Plans (NIPs). For the POPs listed in 2009, 37% of Parties still need to submit their NIPs, 78% for the POPs listed in 2017, and 87% for the POPs listed in 2019.

- Parties should ensure meaningful multi-stakeholder consultation in the design and implementation of NIPs to enable an effective, inclusive, and regular public participation process to comply with commitments in Articles 7 and 10.
- There is a significant lack of information on the quantities of POPs produced, imported, exported, and disposed of. Increased reporting would allow for better assessment of the effectiveness of implementing the Convention.

FINANCIAL RESOURCES AND MECHANISMS, INCLUDING BY NON-STATE ACTORS

The projected cost of comprehensively addressing POPs currently covered by the Stockholm Convention is estimated at US$ 18,332 million between 2026–2030. Additionally, several new POPs are in the process for listing under the Convention and will also require funding. For comparison, the GEF-8 replenishment included $413 million allocated to the Stockholm Convention for 2022 – 2026.

- Economic instruments to recover costs from companies that have produced POPs and/or countries in which they are based should be explored to operationalize the polluter pays principle. For many POPs, a relatively small number of companies have externalized enormous costs onto governments and the public that should be recovered.
- The COP should encourage a process for the Special Programme to enable access to funding for public interest NGOs for activities in line with Programme objectives, noting the important role of NGO contributions to Convention implementation and institutional strengthening.

EFFECTIVENESS EVALUATION OF THE CONVENTION AND GLOBAL MONITORING

The process of the third evaluation of the effectiveness of the Convention is expected to be initiated at the COP. An essential tool in this process is the global monitoring of POPs. Due to the vast production, use, and release of POPs, the health and well-being of Arctic Indigenous Peoples have been disproportionately harmed, and the Convention acknowledges that Arctic ecosystems and Indigenous Peoples are especially at risk.

- Effectiveness evaluation and global monitoring should continue to be supported.
- Stringent and swift actions by States are urgently needed to protect the health and well-being, lands, and territories of Indigenous Peoples and all peoples globally. Indigenous Peoples should have the right to fully participate as members of the expert committees of the Stockholm Convention and provide input on the global monitoring plan and effectiveness evaluation.
- In addition to other types of samples, the global monitoring programme should include:
    - The traditional foods of Indigenous Peoples in the Arctic and throughout the world, including fish and marine mammals, and POPs in key market foods that are important to the diets of people throughout the world.
    - POPs in microplastics collected around the world, including in remote areas.

COMPLIANCE

The Stockholm Compliance Committee was established recently, and its work plan will be considered at the COP.

- The Committee should be mandated and resourced to address urgent systemic issues of general compliance and implementation, such as the identification of POPs in stockpiles, products and articles in use and wastes.

SEVENTEENTH MEETING OF THE CONFERENCE OF THE PARTIES TO THE BASEL CONVENTION

GENERAL TECHNICAL GUIDELINES ON THE ENVIRONMENTALLY SOUND MANAGEMENT OF WASTES CONSISTING OF, CONTAINING, OR CONTAMINATED WITH PERSISTENT ORGANIC POLLUTANTS

This guideline contains the Low POP Content Levels (LPCL). Any waste containing a POP at a concentration higher than the LPCL is defined as 'POP waste' and must be destroyed or irreversibly transformed so that it no longer exhibits POPs characteristics.

- The call for information and assessment of destruction technologies, including the efficiency of currently listed technologies, should be supported since it will enable addition of non-combustion destruction technologies. The call for more information on LPCL may result in establishing stricter Low POP Content Levels (LPCL) and is supported.
- A high LPCL means a large volume of waste contaminated with POPs will not be managed soundly, with possible impacts on human health and the environment. A high LPCL also means that more POPs-contaminated waste is allowed to be shipped to Low- and Middle-Income Countries.
- IPEN supports the following protective LPCL values:

POPs	Supported Low POPs Content Level
Chlorinated Dioxins and Furans: PCDD/F + Dioxin-like PCBs	1 ppb (1 microgram TEQ/kg)
Mixed halogenated Dioxins and Furans: PXDD/F	1 ppb (1 microgram TEQ/kg)
Polybrominated biphenyl ethers (tetra-, penta- hexa-, hepta-, decaBDE)	200 mg/kg as a sum
Dechlorane Plus	10 mg/kg
Hexabromocyclododecane (HBCD)	100 mg/kg
Short-chained chlorinated paraffins (SCCPs)	100 mg/kg
Medium-chained chlorinated paraffins (MCCPs)	500 mg/kg
PFOS, PFOA, PFHxS and related compounds	0.025 mg/kg for PFOS, PFOA or PFHxS and their salts individually; 10 mg/kg for sum of PFOS, PFOA, PFHxS and related compounds.
UV-328	15 mg/kg
Chlorpyrifos	50 mg/kg

TECHNICAL GUIDELINES READY FOR ADOPTION

- Parties should adopt the guidelines on the environmentally sound management of wastes consisting of, containing or contaminated with

1. PBDEs or Dechlorane Plus;
2. POP pesticides;
3. UV-328; and
4. Mercury and mercury compounds.

TECHNICAL GUIDELINES THAT NEED ADDITIONAL WORK

Several other technical guidelines have been developed and revised. However, more work is needed to finalize them to ensure that they contain sufficient information about hazardous chemicals, health and safety, and remediation of contaminated sites.

- Parties should extend the mandate of the Small Intersessional Working Groups (SIWGs) to conduct further work on
    - waste lead-acid batteries;
    - waste batteries other than waste lead-acid batteries (lithium ion etc); and
    - used and waste pneumatic tyres.
- The mandate of the expert working group on e-waste should be extended, in particular for additional work on the distinction between waste and non-waste.

FURTHER CONSIDERATION OF PLASTIC WASTES

This agenda item is based on a wide range of comments submitted by Parties and observers including IPEN. Key items to support include:

- The establishment of a new intersessional working group to assess the effectiveness of the plastic waste amendments and plastic waste technical guidelines as they relate to the management and transboundary movement of plastic waste. Until this effectiveness evaluation has been conducted, the technical guidelines should remain as adopted by the COP in 2023.
- Review and amendment of certain Basel POP waste technical guidelines as they relate to plastics wastes and their transboundary movement.
- Clarifying status of refuse-derived fuels (RDF) and synthetic textile wastes either as other plastic wastes (Y48) or hazardous plastic wastes (A3210) covered by the prior informed consent procedure for transboundary movement and allowing this waste type to be tracked.
- Removing exemptions in Y48 for fluoropolymers, cured resins, and condensation products that cannot be recycled in an environmentally sound manner after use.

LEGAL CLARITY

The expert working group on the review of annexes of the Basel Convention has worked on draft amendments to several Annexes (I, II, III, IV, and IX).

- To protect against exports of e-waste under the guise of repair, the proposed paragraph R14alt of Annex IV should be adopted. This will ensure that exporters of broken or non-functional equipment would have to notify all importing countries and receive their consent before the loads of equipment can be exported and that e-waste remains waste until it is made into working equipment.
- Refuse-derived fuel (RDF) should be included in this work and assigned a specific HS code.
- For many of the items, more intersessional work is needed to finalize this work.

REVIEW OF THE PRIOR INFORMED CONSENT (PIC) PROCEDURE

An intersessional working group has reviewed the PIC procedure to improve communications and identification of hazardous waste shipments, noting that paper-based systems are still used in many locations and can cause delays.

- Practical suggestions include implementation of a fully electronic system using emails, acknowledgement of emails receipt, and ensuring emails are not sent to a single officer but can be received by several competent authorities.
- Any proposals relating to the PIC procedure that are likely to result in decreased transparency of hazardous waste shipments must be rejected.
- Proposals and recommendations that increase PIC efficiency while retaining transparency of hazardous waste shipments, including electronic communications, should be supported.

ITEMS NOT ON THE AGENDA BUT IMPORTANT TO MONITOR

Shipbreaking: The IMO Hong Kong Convention is coming into force in June 2025. This agreement is weaker than the Basel Convention in safeguarding the environment and human rights from ships as waste and ship-born wastes.

- Parties should not allow the Hong Kong Convention to replace or undermine provisions under the Basel Convention, including the Ban Amendment.

Plastic waste technical guidelines: The technical guidelines on plastic waste were adopted at the COP in 2023. Two sections of text on chemical recycling accompany the guidance but are in square brackets (meaning it is not agreed upon text and has no status). Chemical recycling has not been independently verified as environmentally sound management for plastic waste.

- Any attempts to reopen the plastic waste technical guidelines at this COP to include chemical recycling should be opposed, since it is premature until Parties have had adequate time to evaluate the effectiveness of the guidelines in their current form.

TWELFTH MEETING OF THE CONFERENCE OF THE PARTIES TO THE ROTTERDAM CONVENTION

RULES OF PROCEDURE

The Rules of Procedure for the Rotterdam Convention COP were adopted in 2004. However, Rule 45.1 was left in brackets.

- Parties should support effective operation of the Convention by removing the brackets in Rule 45.1 to permit voting when all efforts at consensus have been exhausted. This will help to avoid deadlocks created by a single or a few Parties.

LISTING OF CHEMICALS IN ANNEX III OF THE CONVENTION

The listing of chemicals under Annex III empowers countries to decide if they want the listed hazardous chemicals to be imported. The listing does not prevent the use of these chemicals.

- Parties should support the proposed listings of the following chemicals in Annex III of the Convention:
  - Acetochlor
  - Carbosulfan
  - Chlorpyrifos
  - Chrysotile asbestos
  - Fenthion
  - Iprodione
  - Mercury
  - Methyl bromide
  - Paraquat
  - Liquid formulations containing paraquat dichloride

ENHANCING THE EFFECTIVENESS OF THE ROTTERDAM CONVENTION

Failing to list toxic chemicals evaluated under the Convention and found to meet all criteria has triggered a governance crisis that urgently needs resolution.

At COP 11, a call for information was issued on the potential direct and indirect trade and socioeconomic impacts and the financial implications caused by or anticipated from the listing of chemicals in Annex III, including the costs of inaction. This call was issued despite the understanding that none of these are valid criteria under the Convention but are still cited as justifications by proponents of non-listing.

In response, IPEN provided evidence that inaction

- undermines the Convention and prevents it from achieving its objective of protecting human health and the environment;
- undermines the regulatory actions of countries and their sovereign right to control what enters their borders and into their markets;
- leads to illegal trade and human and environmental exposure to toxic chemicals; and
- hinders countries from fulfilling their obligations to protect the human right to a clean, healthy, and sustainable environment, including safe and healthy working environments.

In addition, IPEN´s submission showed that listing a chemical in Annex III of the Rotterdam Convention has not led to new regulatory actions or trade impacts.

Further, important evidence provided by the Australian Council of Trade Unions, Union Aid Abroad and Solidar Suisse, and Pesticide Action Network International showed the high cost of inaction due to harm to human health and the environment and refuted claims of negative impacts from listing chemicals.

Submissions provided both in previous and current intersessional work containing claims of negative impacts of an Annex III listing generally lack references, scientific evidence, or other documentation to substantiate such claims. A limited number of submissions were provided after COP 11, many of which were from the small number of Parties that are proponents of non-listing and from industry stakeholders with vested interests.

- Parties should read the report in INF11 with this context in mind.
- The way forward must focus on international controls and strengthening the Convention to make sure it fulfils its objective to protect human health and the environment from potential harm.

IISD/ENB - Kiara Worth

JOINT ITEMS FOR ALL THREE CONVENTIONS

TECHNICAL ASSISTANCE AND CAPACITY BUILDING

- Mechanisms for technical assistance and technology transfer must be strengthened and prioritized for effective elimination of listed POPs and the phase-in of alternatives.
- Financial and technical assistance should be provided to support long-term sustainable implementation of monitoring of POPs.
- Considering the large remaining stockpiles of PCBs, DDT, and other POPs, Regional Centres should as a high priority conduct training on non-combustion methods of destruction that meet Convention requirements.
- Regional Centres should increase the involvement of public interest NGOs and civil society in their work through direct participation in the design and implementation of projects. This criterion should be included in their evaluations and reporting.

COOPERATION AND COORDINATION

- It is vital for the BRS Convention Parties and Secretariat continue to engage in the INC process for the Plastics Treaty, noting the many POPs and other hazardous chemicals used in plastics.
- Enhanced cooperation and coordination between the BRS Convention and relevant regional conventions and agreements should be encouraged for the effective implementation of the BRS Convention at the regional level.

MAINSTREAMING GENDER EQUALITY

Gender and biological sex influence the impact, magnitude and patterns of exposure to POPs and other toxic chemicals. For more detail, see, for example, IPEN´s report on Women, Chemicals and the SDGs. Therefore, continued efforts should be supported to ensure that

- Gender considerations are an integral part of the implementation of all the policies, programmes, and activities under the Convention.
- Equal participation is upheld in local, regional, and global decision-making.
- Groups in especially vulnerable situations, which are often women, are protected.
- All monitoring programs should provide gender-disaggregated data.

SYNERGIES IN PREVENTING AND COMBATING ILLEGAL TRAFFIC AND TRADE IN HAZARDOUS CHEMICALS AND WASTES

Illegal trade in hazardous chemicals and wastes harms human health and the environment, and impacts developing countries disproportionally.

- Parties to the Rotterdam and Stockholm Conventions should provide information about cases of trade occurring in contravention of those Conventions, to be made available on the website of the Conventions.
- Parties to the Basel Convention must fulfil their legal obligations to neither export nor import wastes considered illegal under the Conventions. All such shipments must be reported by Parties.

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