



Mr. Maged Younes

Secretariat of the Stockholm Convention
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Geneva, Switzerland

Subject: Comments to the POPs Review Committee on Drafts Risk Management Evaluation of chemicals proposed for listing in Annexes of the Stockholm Convention

Dear Mr. Younes,

We would like to submit our comments to the POPs Review Committee on Drafts Risk Management Evaluation of chemicals proposed for listing in Annexes of the Stockholm Convention.

Lindane (1 α , 2 α , 3 β , 4 α , 5 α , 6 β -hexachlorocyclohexane, CAS No.: 58-89-9), we see structure of gamma HCH on page 7 on structure of HCH isomers differently. The precise structure for gamma HCH is in annex 1.

Alpha HCH (1 α , 2 α , 3 β , 4 α , 5 β , 6 β -hexachlorocyclohexane), we see on page 6 mistake on CAS No. for racemic alpha HCH. The correct CAS No. is 319-84-6 and on the same page in CAS No. for (+)-alpha HCH is short of dash. The correct CAS No. is 119911-69-2.

Beta HCH (1 β , 2 β , 3 β , 4 β , 5 β , 6 β -hexachlorocyclohexane), we see on page 6 mistake on IUPAC name for beta HCH. Correct name is 1 β , 2 β , 3 β , 4 β , 5 β , 6 β -hexachlorocyclohexane.

Short-chained chlorinated paraffins, on page 5 segment "Information submitted under Annex E of the Stockholm convention indicated that SCCPs were produced in the former Czechoslovakia (Novaky, Slovakia), Though quantities are not known. We would like to inform that quantities are in annex 2.

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Best regards

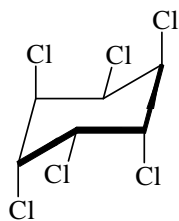

Mrs. Dana Lapešová

*Deputed director
of Waste Management and Basel Convention Centre*

Annex 1
Annex 2

Annex 1

Structure of gamma HCH (1 α , 2 α , 3 β , 4 α , 5 α , 6 β -hexachlorocyclohexane)



Annex 2

The production of SCCPs (CAS No. 85535-84-8) in Novaky, Slovakia was follow:

y.	1999	479 t
y.	2000	584 t
y.	2001	520 t
y.	2002	100 – 500 t
y.	2004	560 t
y.	2005	354 t
y.	2006	380 t