



MINISTRY OF PUBLIC UTILITIES AND THE ENVIRONMENT

Sacred Heart Building, 16-18 Sackville Street, Port of Spain, Trinidad W.I.
Phone: (868)-625-6083 Fax: (868)-625-7003

MPUE: 14/1/16

June 25, 2007

Mr. Maged Younes
Acting Executive Secretary
Secretariat of the Stockholm Convention
on Persistent Organic Pollutants
International Environment House
11-13, chemin des Anémones
CH - 1219 Châtelaine
Geneva
Switzerland

Dear Mr Younes,

Re : Invitation to submit comment to the POPs Review Committee on Draft Risk Management and Draft Risk Profiles of Chemicals proposed for listing in Annexes of the Stockholm Convention.

Reference is made to your letter dated June 1, 2007 on the subject at caption.

In this regard, the Ministry of Public Utilities and the Environment found the reports to be comprehensive and consistent with the directives of the Conference of Parties for preparing Risk Management and Risk Profiles. The Ministry however provides the following minor comments for your consideration:

Alpha Hexachlorocyclohexane

- (i) Second to last sentence of the last paragraph under Section 3.0 *Synthesis of the Information*. The estimated cancer risk value has been omitted.
- (ii) Last sentence of the last paragraph under Section 3.0 *Synthesis of the Information*. Revise sentence to read – “*Nevertheless...it is strongly recommended to avoid foods in which apha-HCH levels are of concern.*”

Beta Hexachlorocyclohexane

Last sentence of the last paragraph under section 3.0 *Synthesis of the Information*. Revise sentence to read “*Nevertheless...it is strongly recommended to avoid foods in which beta-HCH levels are of concern*”.


Draft Risk Management Evaluations.

The formats of the reports on the different chemicals are inconsistent. The reports on perfluorooctane sulphate, chlordane and lindane had a Chapter 4 - the concluding statement, the Report on hexabromobiphenyl is missing the concluding statement Chapter and the report on commercial pentabromodiphenyl included a Chapter on production, use and releases. It is therefore suggested that the draft risk management evaluation like the draft risk profiles be standardized according to the information requirements as set out in Annex F of the Convention.

It is to be noted that of all the chemicals that are currently being proposed for inclusion under the Stockholm Convention only lindane is currently registered for use in Trinidad and Tobago by the Pesticides and Toxic Chemicals Control Board as an active ingredient in four registered pesticide formulations. Lindane however is not imported in the technical form.

I hope that the comments provided prove useful to the Stockholm Convention Persistent Organic Pollutants Review Committee.

Sincerely,



Jacqueline Ganteaume-Farrell
Permanent Secretary