**Comments and responses on the Draft guidance on sampling, screening and analysis of persistent organic pollutants in products and articles (2013)**

| **Origin** | **Issue area** | **Comment** | **Response** |
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| **Canada** | Overarching: | We have reviewed to ensure (1) the guidance presented is consistent with other documents already issued by the Basel and Stockholm Convention; (2) the information is valuable for the intended audience; (3) the text is clear and unambiguous and supported by existing references. See below for high-level comments, and the changes tracked in the documents attached.  We suggest that the disclaimers be strengthened to remind the reader that, while reasonable efforts have been made in reviewing the guidance document, in the case of any discrepancy between the information contained in the guidance document and the Stockholm Convention on POPs, the text of the Convention would prevail. | Considered and modified |
| **Canada** | Overarching: | We are concerned with the level of resources required to review, and the potential for errors caused by, the duplication between these documents and guidance material that already exists under other agreements, particularly as it relates to environmentally sound management of wastes and the availability of existing guidance under Basel. This area might be a good candidate for efficiencies between BRS conventions. | Considered and references to Basel Guidelines have been included |
| **Canada** | Sampling, Screening and Analysis of POPs in Articles | The scope of chemicals addressed in this guidance document should be clarified. For example, although it says all new POP from 2009 and 2011, it appears to be missing Hexachlorocyclohexane and Lindane (2009), and Endosulfan (2011).  The document should also be careful not to mention substances which, to date, have not been adopted for listing to the Convention, such as SCCAs, octa and decaBDE, and all PFCs. While HBCD is another new POP (2013), it is the subject of a separate guidance document and can be left out from this one. | The scope of the guidance is only for industrial and unintentional POPs in articles and products. The guidance does not address POPs Pesticides, as stated in the introductory section.  PCN, PCP and HCBD have been incorporated to the guidance  SCCP and DecaBDE are recommended for listing at COP-8 in May 2017. This is mentioned in the guidance with relevant reference to COP8 Working Documents.  PFCs are mentioned to some extent in the guidance, however noting that they are not listed in the Stockholm Convention. These chemicals are considered under SAICM, and the relevance of synergies is therefore highlighted. |
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| **Canada** | Sampling, Screening and Analysis of POPs in Articles | It may be difficult for some parties to implement the analysis of all treated articles proposed. Going forward, it may be helpful if guidance was given on the more hazardous articles or those that contribute the most to the overall environmental loading so that countries could focus their efforts where it is most valuable. | The relevance of articles is mentioned where information is available. |
| **Canada** | Sampling, Screening and Analysis of POPs in Articles | We are concerned with the overlap between some of the information presented in this document and in the seven technical guidelines of the Basel Convention on POPs, which also cover sampling, monitoring and analysis. While the information appears to be accurate and consistent, we would like to suggest that the document defer to the authority of the Basel Convention and guidance developed under it instead of duplicated here. | The Stockholm Convention addresses POPs through a life cycle approach and their presence in. articles and products are better addressed under the Stockholm Convention. Practical examples have been included in the guidance.  Waste is a minor part of the current SC guidance and where relevant, links to Basel Convention guidelines are highlighted. |
| **Canada** |  | Care should be taken to ensure the document is aimed at helping Parties develop their national implementation plans (NIP). As such, statements like “companies need to assure” (in Annex 1-B) could be reformulated to focus on what a NIP should consider, and avoid statements that appear to put obligations on companies directly. | Considered and modified |
| **Canada** |  | Certain references need to be validated, taking into account documents that have since been updated. | References where updated and considerably extended |
| **Canada** | Page 11 | Best to identify specifically which PBDEs are being referred to | Considered and modified |
| **Canada** | Page 11 | Should list them explicitly for certainty. It is no longer accurate to say “newly listed” since HBCD was added in 2013 but not included in this document. Care should be taken to ensure the information is current and relevant, and not affected by the passage of time. | Modified to “additionally listed” |
| **Canada** | Page 13 | Recommend keeping language as consistent as possible with the Convention, which lists PeCB (not PeCBz). This correction applies throughout. | PeCBz was substituted by PeCB as in Convention text (although this is rather the abbreviation of Pentachlorobiphenyl) |
| **Canada** | Page 13 | Verify reference number and title, also reference 4 (2012d) was revised in May 2015 | The reference has been update d |
| **Canada** | Page 13 | Addition of text referencing to Basel Guidelines | Text was added |
| **Canada** | Page 14 | Care should be taken to ensure the information is current and relevant. In this case, each POP addressed by this guidance should be explicitly listed for certainty. | Paragraph is added to clarify the scope of the guidance |
| **Canada** | Page 14 | Inventory development is addressed through separate guidance documents | This guidance supports the inventory development on Tier III level and reference is made to it where deemed appropriate. For example, impact factors of plastic for recycling need to be determined and this guidance may be used for this purpose. |
| **Canada** | Page 14 | It may be helpful to provide a small paragraph explaining why the original 12 POPs (other than HCB, PCDD, PCDF and PCB?) are not discussed in this document. | Considered and added |
| **Canada** | Page 15 | Please specify for clarity | Considered and specified |
| **Canada** | Page 17 | Care should be taken to ensure the information is current. | Information was updated. The IEC 62321-6 standard has been developed and published and reference to it is made here. |
| **Canada** | Page 18 | Not all PFCs are listed on the Convention. If this is meant to include specific POPs they should be listed. | Considered |
| **Canada** | Page 20 | SCCPs and PFOA have not been listed | Considered and added that “SCCPs are recommended for listing at COP8 and that PFOA is not listed in the Stockholm Convention but currently assessed by POPRC and found to meet the POP criteria” |
| **Canada** | Page 21 | The footnote contains helpful text and should be added to the main body as suggested below. | Considered and modified |
| **Canada** | Page 37 | Consider introducing the two commercial mixtures as related to the PBDEs actually listed in Annex A of the Convention. | A paragraph was added to introduce PBDEs and PBB listed in the convention |
| **Canada** | Page 45 | Please be consistent when referring to the commercial mixtures | Considered and modified |
| **Canada** | Page 46 | Please be consistent when referring to the commercial mixtures. In this case, not clear if “technical OctaBDE” = c-Octa, or pure octaBDE (note lowercase). | It is c-OctaBDE. Modified |
| **Canada** | Page 47 | Please be consistent with the c- preface for the commercial mixtures to avoid possible confusion | Considered and modified |
| **Canada** | Page 50 | Recommend keeping language as consistent as possible with the Convention, which says “formed and released unintentionally”. The Convention does not state “unintentionally produced”. In this case, however, it is not necessary to specify. | Considered and modified |
| **Canada** | Page 50 | Note that “mixtures” is not used in the convention, and using this term without proper introduction may cause confusion. If this guidance document is meant to draw attention to mixtures, this could be introduced more clearly. | Considered and deleted |
| **Canada** | Page 52 | Recommend keeping language as consistent as possible with the Convention, including specific references wherever applicable | Considered and added |
| **Canada** | Page 60 | While the term “good” in this sense has been used under Basel, its definition has been the subject of many discussions (under Basel) and we suggest avoiding its use. Recommend keeping language here as consistent as possible with the Stockholm Convention. | Considered and deleted and included suggested text |
| **Canada** | Page 60 | Please include reference. | Reference included |
| **Canada** | Page 63 | Recommend avoiding the use of such qualifiers given the rapid decline of residual PentaBDE in-service. | Considered and deleted |
| **Canada** | Page 63 | Care should be taken to ensure the document is written with a view to help Parties develop their national implementation plans (NIP), and avoid statements that appear to put obligations on companies directly. | Considered and modified |
| **Canada** | Page 64 | Note that “Mixtures” is not used in the convention, and using this term without proper introduction may cause confusion. If this guidance document is meant to draw attention to mixtures, this could be introduced more clearly. | Considered and modified |
| **Canada** | Page 64 | Recommend keeping language as consistent as possible with the Convention, including specific references where applicable. | Considered and modified |
| **Canada** | Page 71 and 72 | Please be consistent when referring to the commercial mixtures | Modified |
| **Canada** | Page 90 | Please be consistent when referring to the commercial mixtures. In this case, not clear if c-Octa or pure octaBDE. | It is c-OcaBDE. Modified |
| **Romania** | Overall comment | We propose to be completed with information for new added POPs which may be present in products and articles (HBCD, PCP, its salts and esters and PCN). | Considered. HBCD, PCP its salts and esters and PCN as well as HCBD have been incorporated. |
| HBCD Industry Group | Comments made to the monitoring part of HBCD inventory guidance (comment A 99 to A 102) | Background: The HBCD inventory guidance contained in the Annex a part on sampling and analysis of HBCD. This part was commented and corrected by the HBCD Industry Group. | Sections of the monitoring part from the Annex of the inventory guidance have been incorporated in the Guidance on Sampling, Screening and Analysis. The comments and corrections were considered and integrated |
| HBCD Industry Group | Comments made to the monitoring part of HBCD inventory guidance | Please note that the study is available here:  Schlummer M., Vogelsang J., Fiedler D., Gruber L., Wolz G., 2015 ,Rapid identification of polystyrene foam wastes containing hexabromocyclododecane or its alternative polymeric brominated flame retardant by X-ray fluorescence spectroscopy (Waste Management Research July 2015, Vol. 33, No. 7, 662-670) http://wmr.sagepub.com/content/33/7/662 | The publication is considered in the updated Guidance on Sampling, Screening and Analysis and is additionally described as a case study for screening of HBCD in the Annex. |
| HBCD Industry Group | Comments made to the monitoring part of HBCD inventory guidance | Please refer to the document submitted together with the comments of the HBCD IG on the Inventory Guidance. (Referring to: Determination of HBCD in Polystyrene Foams with the GC-FID Technique, HBCD Industry Group, September 2015). | The analytical method was considered and is included as method in the updated HBCD monitoring part in the Guidance on Sampling, Screening and Analysis |
| HBCD Industry Group | Comments made to the monitoring part of HBCD inventory guidance | Suggestion on adding NMR technology as screening tool. D. Jeanerat, M. Pupier, S. Schweizer, Y. N. Mitrev, P. Favreau, M. Kohler, Chemosphere 144 (2016), 1391-1397). | The NMR screening method was considered and is included as screening method in the updated HBCD monitoring part in the Guidance on Sampling, Screening and Analysis |
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