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Stockholm Convention on Persistent Organic Pollutants

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Persistent Organic Pollutants Review Committee

Fourth meeting

Geneva, 13–17 October 2008

Item 3 (c) of the provisional agenda*

**Operational issues: report on the outcomes of activities
undertaken for effective participation of Parties in
the work of the Committee**

Comments and responses on the handbook for effective participation in the work of the Committee

Note by the Secretariat

The draft handbook for effective participation in the work of the Persistent Organic Pollutants Review Committee prepared during the intersessional period by the working group established by the Committee for this purpose is set out in document UNEP/POPS/POPRC.4/INF/4. The annex to the present note contains a table listing the comments received during the intersessional period between the third and fourth meetings of the Committee and the regional workshops held in Uruguay (3–5 August 2008), Thailand (3–5 September 2008) and Burundi (22–26 September 2008). The annex is submitted as prepared by the working group and has not been formally edited.

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Annex

Comments relating to the handbook for effective participation in the work of the Committee

Minor grammatical or spelling changes have been made without acknowledgment. Only substantial comments are listed.

Source	Page/section	Comment
Intersessional working group	General	It should be indicated that the handbook is a living document and what the status/date of newest information is.
	Page 4 – Introduction	PFOS does not accumulate by this classic mechanism. It might be enough to state, "accumulate in living organisms"
	Page 4 – Introduction	Insert "with the goal of elimination".
	Page 9 – Identification of a candidate POP	Replace "Many" by "Some".
	Page 9 – Identification of a candidate POP	Further guidance on how to do a quality check of used information would be useful.
	Page 9 – Preparation of nomination	Add "in particular also on paragraph 2 of Annex D which may help the POPRC to decide whether there is a real potential problem or not and to prioritise, if needed."
	Page 9 – Identification of a candidate POP	The information should be publicly available.
	Page 10 – Preparation of nomination	Which box is meant by "This provision has already been used by one Party for three closely related substances (see box)."??
	Page 10 – Preparation of nomination, Box for "What Parties should do"	This box should include the basic features of data collection to support the nomination; it emphasizes producers and importers, but the most important information at the beginning is really the characteristics of the substance and how Parties collect and deliver this information.
	Page 11 – Verification	Endosulfan was not withdrawn; the consideration of the proposal was delayed.
	Page 11 – Verification, Box for "What Parties should do"	This box should include the basic features of data collection to support the nomination; it emphasizes producers and importers, but the most important information at the beginning is really the characteristics of the substance and how Parties collect and deliver this information
	Page 11 – Verification, Box for "What Observers could do"	Observers should also participate in ensuring the quality of the Annex D screening information; this box seems to neglect the most important aspect of the Annex D evaluation
	Page 12 – Screening by the Committee	Maybe two separate sentences that distinguish between the two types of groups and how one leads into the other would be useful.

Source	Page/section	Comment
Intersessional working group	Page 11 – Verification, Page 12 – Screening by the Committee and Page 13 – Committee decision on screening criteria	Mention that there is still space to improve, for example on the screening according to Annex D, paragraph 2, for example on comparing toxicity with detected or predicted levels, and how improvements could be done.
	Page 13 – Screening by the Committee	Add “as well as the information on para 2 if available”.
	Page 13 – Screening by the Committee, Box for “What Parties should do”	Delete cost-benefit issues
	Page 13 – Committee decision on screening criteria	Replace “criteria” by “requirements”.
	Page 15 – Table 1 (Civil Society)	This function should be expanded to include provision of information relevant to the evaluation of the candidate substance; NGOs often have quite a bit of relevant information that could be useful to the Committee
	Page 16 – Creation of an ad hoc working group	Insert “harms caused by the candidate substance”
	Page 19, table 3	It could be useful to include the OECD HPV SIDS dossiers, the WHO CICADS and the IUCLID data base of the EU.
	Page 24 – Committee decision on the risk profile	This section is good but leaves out one very important component from the Convention that the Committee has in fact utilized: the precautionary approach language; " Lack of full scientific certainty shall not prevent the proposal from proceeding."
	Page 26 – Committee decision on the risk profile	Add a reference.
	Page 32 – Committee decision on the risk management evaluation and recommendations to the Conference of the Parties	This is not logical and runs counter to Convention goals. Currently used substances that require exemptions can be listed in Annex A and re-evaluated periodically to determine if alternatives are available. Annex B only contains DDT and should be reserved for substances used for critical public health purposes or some other critically important purpose. None of the substances evaluated by the POPRC so far fit the criteria for listing in Annex B. Suggested language: Substances that are still being used where at present there are no alternatives could be recommended for listing in Annex A with appropriate exemptions that would be evaluated periodically.
	Page 34 – Decision by the Conference of the Parties	It might be helpful to reproduce this sentence in a footnote to remind the reader what it says
	Page 36 – Conflict of interest issues	Insert “Real or perceived conflict of interest on behalf of Committee members will impact on the credibility of the Committee and its decisions.
Page 36 – Conflict of interest issues	Insert “or co authoring of research papers”	

Source	Page/section	Comment
Intersessional working group	Page 38 – Implication of amendments	Time-limited exemptions can also exist in Annex A; see comment above about utilizing Annex B for substances needed for critical public health purposes or some other critically important use Proposed language: If a substance is listed in Annex A, there may be some acceptable purposes or specific exemptions for which it might still be produced and used.
	Page 38 – Implication of amendments	Delete “and that the substance might be moved from Annex B to Annex A.”
	Page 40 – Generic issues	There are already 12 substances that have been nominated to be included under the Convention (no longer 11).
	Page 42 – Approach to isomers of nominated substances	It could be added that Mexico submitted the other two isomers.
	Page 42 – Substances no longer produced or used	Replace “although more recently” by “since long”.
	Page 42 – Substances no longer produced or used	Risk quotients based on actual measured concentrations for prey species were available for example, laboratory data were not used in this example.
	Page 42 – Substances no longer produced or used	This description is not at all representative for the discussions and information exchange as they took place. All risk assessments have shortcomings and in order to provide useful guidance from this experience, the uncertainties should be made clear and discussed. The benefits of a risk quotient approach should be mentioned as well.
	Page 45 – Concluding remarks	The agenda of POPRC-3 was clearly overloaded. It forced decisions to be taken on text which was seen only once by POPRC which jeopardizes scientific robustness. Also discussions had to be postponed to Friday evening session without translation. There has been insufficient time to benefit from and include relevant knowledge from the scientific domain, such as exposure and effects modelling of POPs.
Regional workshop in Uruguay (20-22 August 2008)	General	It needs major revision but it is very useful.
	General	Useful in describing country-approach to chemicals evaluation.
	General	Practical and useful.
	General	The annexes need to be completed with a better description.
	General	Needs to undergo major revision, should be more focused.
	General	It appears to be a good document but additional explanations needed in some areas.
	General	It is an excellent draft.
	General	Clarify that the whole life cycle of a chemical is concerned. Include health costs in economic evaluations.
	General	Good and excellent tool.
	General	Comprehensive.
General	Could be more condensed.	

Source	Page/section	Comment
Regional workshop in Thailand (3-5 September 2008)	General	Good attempt. Explanation on how to be involved in the drafting group should be included.
	General	Good clarification for understanding of information requirement.
	General	Simple version of the handbook may help.
	General	Useful and important tool.
	General	Should provide charts and figures to help understanding.
	Annex F information collection	Civil society does not only provide input on the opinion but also can provide concrete information. Civil society could conduct research and/or pilot project to obtain data.
	Annex F information collection	Socio economic data could also be collected from CBO (Community Based Organization).
Regional workshop in Burundi (22-26 September 2008)	General	The handbook is very useful for developing countries to participate in the POPs Review Committee and other users.
	General	Clear and important handbook but very long.
	General	The handbook is fairly user friendly but it requires more refinement in terms of presentation.
	General	It is a useful manual to understand and participate in the work of the POPRC – it should be made available on a general scale.
	General	The handbook is very useful but there are a few typographical errors that need to be corrected. It appears that the handbook was translated to English from another language.
	General	Vivid, descriptive and sound. It is a powerful tool for effective participation in the POPRC.
	General	Information is presented in details and this helps us to understand better and increase our knowledge.
	General	The manual is very important but I still have to study it in more detail.
General	The handbook is a useful tool because it can be used to inform other stakeholder.	