

## Annex F Questionnaire (one per chemical)

<b>Chemical name (as used by the POPs Review Committee (POPRC))</b>	<b>Short-chained chlorinated paraffins</b>
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### Explanatory note:

1. This chemical is undergoing a risk management evaluation. It has already satisfied the screening criteria set out in paragraph 4 (a) of Article 8 of the Convention. A risk profile has also been completed for this chemical in accordance with paragraph 6 of Article 8 and with Annex E to the Convention.

Introductory information	
<b>Name of the submitting Party/observer</b>	<b>Switzerland</b>
<b>Contact details (name, telephone, e-mail) of the submitting Party/observer</b>	<b>Federal Office for the Environment Substances, Soil and Biotechnology Division Contact: Bettina Hitzfeld / Georg Karlaganis <a href="mailto:bettina.hitzfeld@bafu.admin.ch">bettina.hitzfeld@bafu.admin.ch</a> / <a href="mailto:georg.karlaganis@bafu.admin.ch">georg.karlaganis@bafu.admin.ch</a> +41 31 32 31768</b>
<b>Date of submission</b>	<b>5 February 2008</b>

Additional Annex E information	
<b>(i) Production data, including quantity and location</b>	<b>Chlorinated paraffin mixtures are not produced in Switzerland. In the Swiss Product Register several compounds that contain chlorinated alkanes are listed. There was no import to Switzerland of compounds with CAS numbers 85535-84-8 (Alkanes, C10-13, chloro) and 63449-39-8 (Paraffin waxes and Hydrocarbon waxes, chloro), respectively. At the time being no data is available on the import of commercial products containing chlorinated paraffins intended for the formulation of products like lubricants, paints or sealants. In addition the import volume of chlorinated paraffins with products including articles like plastics, rubber and textiles is not known.</b>
<b>(ii) Uses</b>	<b>The Swiss regulation on SCCPs implements Directive 2002/45/EC as well as PARCOM Decision 95/1. The prohibitions came into force on August 2006. The ban covers paint and varnishes, sealants, plastics and rubbers, textiles, leather fat liquors and metalworking lubricants. Other uses of SCCPs are not known.</b>
<b>(iii) Releases, such as discharges, losses and emissions</b>	<b>No new data</b>

### Explanatory note:

2. This information was requested for preparation of the risk profile in accordance with Annex E of the Convention. The POPRC would like to collect more information on these items. If you have additional or updated information, kindly provide it.

<b>A. Efficacy and efficiency of possible control measures in meeting risk reduction goals (provide summary information and relevant references):</b>	
<b>(i) Describe possible control measures</b>	<p>In Switzerland the requirements on classification and labelling of chemicals are harmonized with those of the EC legislation. The labelling of preparations which contain more than 2.5% by mass SCCPs as “Dangerous for the Environment” could lead to more responsible handling and disposal of the products by users.</p> <p>The Swiss chemical legislation has recently been amended and includes a notification obligation of manufacturers and importers of environmentally dangerous substances and preparations (e.g. SCCPs and preparations containing more than 0.25% SCCPs). In future the intended uses and annual quantity supplied of these products must be added in the register of products. The register is kept by the national notification office. The data submitted enable the authorities to take action when a dangerous substance or preparation constitutes an unacceptable risk to the environment.</p>
<b>(ii) Technical feasibility</b>	Registration must be effected in an official Swiss language or English, via the Internet (Internet application) or, in justified cases, using the paper-form provided by the notification authority
<b>(iii) Costs, including environmental and health costs</b>	

**Explanatory notes:**

- If relevant, provide information on uses for which there may be no suitable alternative or for which the analysis of socio-economic factors justify the inclusion of an exemption when considering listing decisions under the Convention. Detail the negative impacts on society that could result if no exemption were permitted.
- “Risk reduction goals” could refer to targets or goals to reduce or eliminate releases from intentional production and use, unintentional production, stockpiles, wastes, and to reduce or avoid risks associated with long-range environment transport.
- Provide the costs and benefits of implementing the control measure, including environmental and health costs and benefits.
- Where relevant and possible “costs” should be expressed in US dollars per year.

<b>B. Alternatives (products and processes) (provide summary information and relevant references):</b>	
<b>(i) Describe alternatives</b>	<p><b>Metal-working lubricants:</b> Evidence suggests that the favoured alternative for neat oils is MCCPs.</p> <p><b>Sealants:</b> SCCPs have been used in sealants based on polysulphide, polyurethane and butyl rubber. Today silicone sealants have the highest market share. Plasticizers used in this type of sealants are polydimethylsiloxanes rather than SCCPs.</p>
<b>(ii) Technical feasibility</b>	
<b>(iii) Costs, including environmental</b>	

<b>and health costs</b>	
<b>(iv) Efficacy</b>	
<b>(v) Risk</b>	<p><b>Metalworking lubricants:</b>  <b>MCCPs are less bioaccumulative than SCCPs but there is also concern about their properties and other alternatives are likely to offer more benefit for the environment.</b></p> <p><b>Sealants:</b>  <b>Polydimethylsiloxanes used in silicon based sealants are expected to have no negative impact to the environment.</b></p>
<b>(vi) Availability</b>	
<b>(vii) Accessibility</b>	

**Explanatory notes:**

7. Provide a brief description of the alternative product or process and, if appropriate, the sector(s), use(s) or user(s) for which it would be relevant.
8. If several alternatives could be envisaged for the chemical under consideration, including non-chemical alternatives, provide information under this section for each alternative.
9. Specify for each proposed alternative whether it has actually been implemented (and give details), whether it has only reached the trial stage (again, with details) or whether it is just a proposal.
10. The evaluation of the efficacy should include any information on the performance, benefits, costs, and limitations of potential alternatives.
11. Specify if the information provided is connected to the specific needs and circumstances of developing countries.
12. The evaluation of the risk of the alternative should include any information on whether the proposed alternative has been thoroughly tested or evaluated in order to avoid inadvertently increasing risks to human health and the environment. The evaluation should include any information on potential risks associated with untested alternatives and any increased risk over the life-cycle of the alternative, including manufacture, distribution, use, maintenance and disposal.
13. If the alternative has not been tried or tested, information on projected impacts may also be useful.
14. Information or comments on improving the availability and accessibility of alternatives may also be useful.

<b>C. Positive and/or negative impacts on society of implementing possible control measures (provide summary information and relevant references):</b>	
<b>(i) Health, including public, environmental and occupational health</b>	
<b>(ii) Agriculture, including aquaculture and forestry</b>	
<b>(iii) Biota (biodiversity)</b>	
<b>(iv) Economic aspects</b>	
<b>(v) Movement towards sustainable development</b>	
<b>(vi) Social costs</b>	

**Explanatory notes:**

15. Socio-economic considerations could include:

- Any information on the impact (if any), costs and benefits to the local, national and regional economy, including the manufacturing sector and industrial and other users (e.g., capital costs and benefits associated with the transition to the alternatives); and impacts on agriculture and forestry;
- Any information on the impact (if any) on the wider society, associated with the transition to alternatives, including the negative and positive impacts on public, environmental, and occupational health. Consideration should also be given to the positive and negative impacts on the natural environment and biodiversity.
- Information should be provided on how control measures fit within national sustainable development strategies and plans.

<b>D. Waste and disposal implications (in particular, obsolete stocks of pesticides and clean-up of contaminated sites) (provide summary information and relevant references):</b>	
<b>(i) Technical feasibility</b>	
<b>(ii) Costs</b>	

**Explanatory note:**

16. Specify if the information provided is connected to the specific needs and circumstances of developing countries.

<b>E. Access to information and public education (provide summary information and relevant references):</b>

**Explanatory note:**

17. Please provide details here of access to information and public education with respect to both control measures and alternatives.

<b>F. Status of control and monitoring capacity (provide summary information and relevant references):</b>

**Explanatory note:**

18. With regard to control capacity, the information required is on legislative and institutional frameworks for the chemical under consideration and their enforcement. With regard to monitoring capacity, the information required is on the technical and institutional infrastructure for the environmental monitoring and biomonitoring of the chemical under consideration, not monitoring capacity for alternatives.

<b>G. Any national or regional control actions already taken, including information on alternatives, and other relevant risk management information:</b>

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**Explanatory notes:**

19. Actions or measures taken could include prohibitions, phase-outs, restrictions, cleanup of contaminated sites, waste disposal, economic incentives, and other non-legally binding initiatives.
20. Information could include details on whether these control actions have been cost-effective in providing the desired benefits and have had a measurable impact on reducing levels in the environment and contributed to risk reduction.

<b>H. Other relevant information for the risk management evaluation:</b>

**Explanatory notes:**

21. The above list of items is only indicative. Any other relevant information for the risk management evaluation should also be provided.

<b>I. Other information requested by the POPRC:</b>
<i>[Note to the Secretariat]</i>

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