

**Comments and responses on the draft guidance Guidance for the inventory of perfluorooctane sulfonic acid (PFOS) and related chemicals listed under the Stockholm Convention on POPs<sup>1</sup>**

<b>Origin</b>	<b>Issue area</b>	<b>Comment</b>	<b>Response</b>
Canada	The level of effort and information required for the inventory may be impractical	<p>The guidance seems to suggest that extensive sampling and testing be done to complete this PFOS inventory in both the industrial sector and the consumer products sector. We question whether Parties would have the capacity and resources to complete that work.</p> <p>With the sector information we have now, Canada would be able to complete a tier I assessment. Tier II would require stakeholder consultations and a great deal of additional time and effort and it is unlikely that we could complete a tier III.</p>	<p>An introduction to the concept behind the tiered approach was introduced in the guidance</p> <p>The tiered approach was proposed as a way of collecting data based on a step-by step format. The idea behind was that the approach could provide flexibility to a wide range of Parties with varying priorities and capacities. Each tier represents a level of methodological complexity. It was therefore understood, that Parties could use the tier that best suits them. Either tier can provide enough elements to establish priorities and develop an action plan.</p>
Canada	Be careful to include only accurate information	We have noted discrepancies in the accuracy of the interpretation and presentation of the findings of scientific studies. For example, the sections on chromium plating are inaccurate.	Addressed in those places signaled by the comments provided by Canada in the guidance document.
Canada	Be careful of sources not yet vetted by the COP	Numerous references are made in this document to sources that have yet to be vetted by the COP. These include: the Guidance on alternatives to perfluorooctane sulfonate and its derivatives; the Technical Paper on the identification and assessment of alternatives to the use of perfluorooctane sulfonic acid in open applications; the Recommendations on risk reduction for PFOS, its salts and PFOSF.	A reference on the status of the documents was included.
Canada	Ensure information is always properly referenced	There are several sections that lack references and/or do not use sufficient scientific studies to support the validity of the findings.	The document has been produced and reviewed by various experts in the frame of a GEF medium-sized project. The Secretariat does not have information as to the sources of information used when initially developing the

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<sup>1</sup> Decision SC-6/12 requests the Secretariat, subject to availability of resources, to integrate parties' comments into the draft guidance and to forward the waste-related content of the draft guidance to the appropriate bodies of the Basel Convention.

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			guidance. Substantive information needs to be made available to the Secretariat to address this comment.
Canada	Be careful not to imply convention obligations	A number of sentences in this document are written in a manner that could imply the existence of Party obligations in areas where there are none. The language used in these cases should be adjusted.	Addressed in those places signaled by the comments provided by Canada in the guidance document.
Mexico		We consider that the guidance to develop, update and review NIPs will be of great help, however, we believe that a successful implementation of the NIP and its action plans is complex. It depends on the institutional capacity, high political support and stakeholders' commitment and also it depends on assigning the adequate resources. 2	
Monaco		We don't have any comments on the draft guidance on inventories of PFOS and related chemicals listed under the Stockholm Convention	
UK		With reference to the third (3) request for comments on the revised/updated and additional guidance on implementation plans, I regret that we have been unable to consult widely and can only offer our comments in respect of our experience of having recently prepared the UK's second National Implementation Plan. In this respect the documents provide the appropriate level of detail to guide the administrative, resource and technical needs which need to be considered to set up the structures necessary for effective implementation of the requirements of the Stockholm Convention. Both the strategic governance and practical implementation needs are well covered. The importance of stakeholder engagement is usefully stressed, as is the need for appropriate application of project management tools. It is clear that advanced as well as developing economies can benefit from the content which provides useful reference material at the heart of which is the importance of considering local circumstances/resources when developing and implementing compliance requirements.	

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2 The paragraph was translated by the Secretariat, no official translation was made.