



Republic of the Philippines  
Department of Environment and Natural Resources  
**ENVIRONMENTAL MANAGEMENT BUREAU**

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APR 22 2016

**MR. JESUS R.S. DOMINGO**

Assistant Secretary

**DEPARTMENT OF FOREIGN AFFAIRS**

2330 Roxas Blvd., Pasay City 1300

Dear Asst. Sec. Domingo:

This refers to your request for comments on the documents provided by the Stockholm Convention on a) the draft risk management for short-chained chlorinated paraffins (SCCP), b) draft risk profile for pentadecafluorooctanoic acid (PFOA), its salts and PFOA-related compounds, and c) draft risk profile for dicofol.

After review of the documents submitted, we respectfully submit the following comments and recommendations:

**A. On Draft Risk Management Evaluation for SCCP**

- Item 88, p. 16 on Paint and coating applications. The need to discuss the possible implications on the effect of alternative pigments use to paint manufacturers since they are now using other pigments. The statement/discussion on alternative pigments should be made clear.
- It is better to include at least an example of measures of Canada or EU in limiting the content of SCCPs in MCCPs and LCCPs. SCCP is unintentionally produced in the manufacture of MCCP and LCCP.
- Good to mention that the risk management evaluation considers the socio-economic information of concerned parties and observers, however most developing countries like the Philippines has no information/data on SCCP and definitely lacks the capability to have the inventory.
- As such, study require to demonstrates not only the technical and economical feasibility but also environmental and socio-cultural factors.

Department of Environment and  
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## B. On Draft Risk Profile for PFOA

- The country through the DENR-EMB has already updated the National Implementation Plan (NIP) where Perfluorooctane Sulfonate (PFOS) and related chemicals i.e., PFOA are incorporated and submitted to Stockholm Convention Secretariat in 2015.
- The Updated NIP's Action Plan identified PFOS and related chemicals (PFOA) as one of the priority industrial chemicals to be managed and controlled (containing products, wastes and processes).
- The need for a comprehensive and complete national inventory in the country, identify and promote safe alternatives in all uses, manage and regulate their products within the country's import and export.
- A policy paper on PFOS and PFOA may be drafted to start the relevant regulation.

## C. On Draft Risk Profile for Dicofol

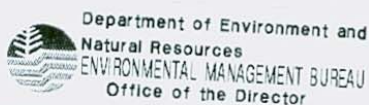
- The use and regulatory profile of Dicofol in developing countries is good to reflect (Item 2.1.2).

As instructed, please be informed that the abovementioned inputs were already submitted through email of [poprc@brsmeas.or](mailto:poprc@brsmeas.or) and [kei.ohno-woodall@brsmeas.org](mailto:kei.ohno-woodall@brsmeas.org).

Very truly yours,

  
**ENGR. EVA S. OCFEMIA, CESO IV**  
Assistant Director and  
OIC-EMB, in concurrent capacity

cc. The Stockholm Convention Secretariat



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